



**Wisconsin Electric** POWER COMPANY  
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October 26, 1984

Mr. H. R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. NUCLEAR REGULATORY COMMISSION  
Washington, D. C. 20555

Attention: Mr. J. R. Miller, Chief  
Operating Reactors, Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301  
UPGRADED EMERGENCY OPERATING PROCEDURES  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated March 30, 1984 we provided an updated schedule for the implementation of our upgraded Emergency Operating Procedures (EOP's). In that letter we stated that we expected to implement the new EOP's in January 1985. This was confirmed in your letter dated July 3, 1984 which transmitted the "Order Confirming License Commitments On Emergency Response Capability".

In order to implement the new procedures in January 1985, we assumed that EOP verification and approval would be completed by August 1984 and that EOP validation and training could be complete by December 1984. Currently, all EOP's have been written and approximately 85% have been reviewed prior to submittal to the verification team. However, the verification process, as described in our Emergency Operations Procedures Generation Package, which was submitted to the NRC in our June 1, 1984 letter, has been more difficult and time-consuming than expected. Verification is approximately 30% complete.

We have reviewed the verification process and taken steps to accelerate it. Although this has shortened the verification time for each EOP, these steps have been insufficient to allow implementation of the new EOP's as scheduled. Any further action we could take would degrade the overall verification process and the resulting quality of the procedures. Because of this, we will be unable to implement the new EOP's by January 31, 1985 as required by your Confirmatory Order dated July 3, 1984.

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Mr. H. R. Denton

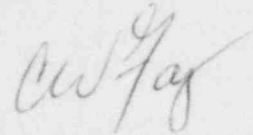
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Therefore, we request that an extension for the implementation of the upgraded Emergency Operating Procedures be granted until July 1, 1985. This will ensure that all EOP's are properly verified and then implemented in a proper manner.

Should you have any questions concerning this matter, please contact us.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector

