



Wisconsin Electric POWER COMPANY
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October 19, 1984

Mr. J. G. Keppler, Regional Administrator
Office of Inspection and Enforcement,
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attention: C. J. Paperiello, Chief
Emergency Preparedness and
Radiological Protection Branch

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
INSPECTION REPORT NOS. 50-266/84-13 AND 50-301/84-11
EMERGENCY PREPAREDNESS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter dated August 21, 1984 forwarded IE Inspection Report Nos. 50-266/84-13 and 50-301/84-11. These reports described the results of a routine safety inspection conducted by members of your staff on July 23-27, 1984 at the Point Beach Nuclear Plant, Units 1 and 2. Also enclosed with your letter were an Appendix A, Notice of Violations, and Appendix B, Emergency Preparedness Weaknesses. We were requested to submit, pursuant to 10 CFR 2-201, a written statement regarding the actions we have or are taking regarding the Appendix A violations and to advise you of the actions we plan to take regarding the identified weaknesses. My letter dated September 20, 1984 requested a thirty day extension to the schedule for our responses to these items. This extension had been discussed briefly with Mr. Snell of your staff on September 13 who indicated such a delay would be acceptable.

The first item identified in Appendix A concerns the review of emergency action levels with state and local governmental authorities. The regulations require this review on an annual basis. We believe this citation is a result of incomplete documentation of these reviews on our part since our discussions with state and local officials each year have included reviews of Emergency Action Levels. Our discussions with state and local

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officials during the first week of September 1984 also included reviews of the Emergency Action Levels. The minutes of these meetings include the documentation that such discussions took place. We will review our procedures and revise them to include this requirement by January 1985. Accordingly, we are now in compliance with this requirement.

The second citation concerned the apparent inability of Shift Superintendents to arrive at off-site protective action recommendations. Although this is normally the responsibility of the Emergency Support Manager, our Emergency Plan states that the Shift Superintendent may have these responsibilities before the emergency response organizations have been fully established. After conversations with our Shift Superintendents, we believe the primary cause for this situation can be traced to weaknesses in our implementing procedures. The procedures as presently written do not adequately link together the requirements of initial action procedures to subsequent follow-up activities and procedures. We have initiated a comprehensive review of our Emergency Plan Implementing Procedures (EPIP's) to find and correct errors and inconsistencies. This review process will also include additions and revisions to the appropriate sections such that emergency response personnel will be directed from initial response procedures to subsequent follow-on procedures, including the EPIP's addressing protective action recommendations. The changes to these procedures, together with the periodic refresher training on the Emergency Plan and the EPIP's, should better prepare our Shift Superintendents and other key emergency response personnel, including the Emergency Support Managers, in arriving at timely protective action recommendations when the conditions necessitate such activities. We expect to complete and issue the revisions and changes to the appropriate procedures in March 1985.

The third item of noncompliance concerns the requirement, pursuant to 10 CFR 50.59(t), that licensees review the emergency preparedness program every twelve months and include an evaluation of the adequacy of interfaces with state and local governments. Section 4.0 of EP 8.0, "Review and Updating of the Plan and Procedures", specifies that the Emergency Plan will be reviewed by the Wisconsin Electric Quality Assurance Section in accordance with Technical Specification 15.6.5.5 which references 10 CFR 50.54(t). Since it is correct that the 1984 audit report did not document an evaluation of the adequacy of state and local interfaces, the audit program will be revised to specifically state that such an evaluation will be included in the annual audit report. Since your inspection, Quality Assurance Section personnel² participated in the September 1984 Emergency Plan exercise and specifically observed the state and local government interfaces. At this time, we have evaluated these interfaces to be adequate.

As noted above, the inspection reports also included an Appendix B which listed program weaknesses. Your August 21 letter requested we advise you of the actions we plan to take regarding these weaknesses and the estimated completion dates. Although a written report was not specifically requested, nor is it required, we are taking this opportunity to comment on these items. If you need additional information about our plans concerning these weaknesses, we will be happy to discuss them further with you or your staff. These responses are listed in order corresponding to Appendix B of the inspection reports:

1. The recommended review of the Emergency Action Levels will be conducted. We anticipate completion of this review and a revision to the Emergency Plan will be completed in March 1985.
2. A review of the Emergency Plan Implementing Procedures is in progress. As discussed previously in this letter, we expect to complete this review and issue clarifying changes to the EPIP's by March 1985.
3. The semiannual shift augmentation drills will be specified in EP 8.0, Section 3.4, "Drills", of the Emergency Plan. This section will be revised by January 1985.
4. An updated letter of agreement from Doctors Clinic, Ltd., has been obtained.
5. An appropriate revision to the Emergency Plan to indicate that the goal of personnel augmentation during an emergency will be to accomplish such augmentation within 30 to 60 minutes was provided in the August 31, 1984 revision of EP 5.0, "Organizational Control of Emergencies".
6. On August 31, 1984 EPIP's 4.1, "Site Emergency-Immediate Actions", and 5.1, "General Emergency-Immediate Actions", were revised to require that Plant evacuation be considered if warranted under these emergency classifications. As a result of conversations with members of your staff during the emergency exercise at Point Beach in September, we are again evaluating our evacuation policy. We understand your recommendation in this regard is to evacuate nonessential personnel at the Site or General Emergency unless conditions prohibit such an evacuation. We may adopt this policy. If so, our procedures will be revised accordingly. Our evaluation should be complete by December 1984.

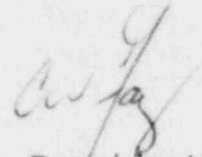
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We have also recently received your October 4, 1984 letter concerning your inspections associated with our annual emergency preparedness exercise. The report forwarded with that letter identified several additional emergency preparedness program weaknesses. We shall contact you by telephone within the suggested 45-day period to advise you of our planned actions to strengthen these areas.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector

