



**Wisconsin Electric** POWER COMPANY

231 W MICHIGAN P O BOX 2046 MILWAUKEE, WI 53201

(414) 221-2345

VPNPD-88-108  
NRC-88-014

February 18, 1988

Mr. Frank J. Miraglia  
Office of Nuclear Regulatory Commission  
U.S. NUCLEAR REGULATORY COMMISSION  
Washington, D.C. 20555

Dear Mr. Miraglia:

INTEGRATED SAFETY ASSESSMENT PROGRAM II

On February 2, 1988, we received your letter dated January 20, 1988, concerning the Integrated Safety Assessment Program II (ISAP II). As requested, we have enclosed a completed survey form regarding ISAP II.

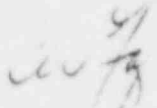
As we noted in our January 25, 1988, comments on the Integrated Schedule Policy Statement, we have been able to accommodate NRC commitments on a case-by-case basis without reliance upon a negotiated integrated schedule. Accordingly, the integrated schedule focus of ISAP II would only be of minor benefit to us.

At the same time, we have embarked upon a self-initiated Safety System Functional Inspection (SSFI) with an independent contractor, as we discussed with your Region III personnel. Participation in an additional assessment program at this time would necessarily require diverting some resources from our SSFI efforts.

As you may be aware, a PRA for our Point Beach Nuclear Plant has not yet been performed. We expect to consider use of the IDCOR methodology after NRC promulgates degraded core evaluation requirements. From this aspect, our participation in ISAP II would appear to be premature.

While these factors suggest that our participation in ISAP II is unlikely to be appropriate at this time, we would appreciate receiving further information as the program develops.

Very truly yours,

  
C. W. Fay  
Vice President  
Nuclear Power

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Enclosure

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Integrated Safety Assessment Program (ISAP) II

Response Format to Generic Letter 88-02

Facility Name: Point Beach Nuclear Plant

Utility: Wisconsin Electric Power Company

Individual Contact Name: Charles Wm. Krause Phone Number: (414)221-2001

An expression of interest will not be considered a commitment to participate on the part of the utility.

1. Would you be interested in participating in ISAP II? If so, in what time frame? For reasons discussed in our transmittal letter, participation does not appear to be appropriate at this time.
2. Do you believe that an industry/NRC seminar consisting of a brief discussion by NRC followed by a question and answer period would be beneficial prior to making a decision? Industry/NRC seminars have usually been beneficial in enhancing the understanding of major programs.
3. Would you be interested in a one-on-one meeting with the NRC to discuss your particular facility or facilities? A one on one meeting would not be essential at this time. Working meetings for programs underway would probably be adequate for addressing specific items.
4. If you remain undecided regarding participation, what additional information do you need in order to make a decision? Detailed technical information could be included in industry/NRC seminars.
5. Do you have any potential concerns about participating in ISAP II?  
We are concerned with the additional resource commitment that would be necessary to support an ISAP II effort, particularly the completion of a plant specific PRA.
6. Do you have any suggestions for program improvements or changes?  
It may be more appropriate to consider this program after actions regarding the NRC Degraded Core Rulemaking have been completed.