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September 30, 1998

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Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301 NRC INSPECTION REPORTS 50-266/98006 A D 50-301/98006 POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated June 3, 1998, Wisconsin Electric forwarded our response to the subject inspection report. The inspection report included a Notice of Violation (NOV) that identified three violations of NRC requirements. Our response to the NOV included corrective actions to address each of the identified violations.

Our response stated we had reviewed our DC loading calculations of record and all of the changes resulting from modifications that have not been formally included, and had verified that system design basis capability is maintained in all cases. In addition, we proposed the following additional corrective actions to address this violation:

- Design basis calculations for the 125 V DC system will be formally revised to reflect the 1. changes to the system made by past modifications. As part of the effort, the set of calculations will be restructured to minimize the number of calculations which require update for any given plant change. This effort will be completed by September 30, 1998.
- NP 7.2.4 will be revised to allow for the evaluation and documentation of the effects of plant 2. modifications on the results or conclusions of calculations without formal revision of the calculation. These changes will include implementation of controls that ensure that users of a calculation will be aware of and have access to evaluations that have not been incorporated into the calculation via revision. Criteria will be developed to limit the age and/or number of such evaluations. NP 7.2.4 will be revised by September 30, 1998.
- 3. Procedures NP 7.2.2, "Design Control," and NP 7.2.4 will be revised to require completion of a documented evaluation for pending changes to plant calculations (as described above) or formal revision of affected calculations prior to the closeout of plant design changes. These procedures will be revised by September 30, 1998. I EOI/0

Action Items 2 and 3 have been completed as scheduled. However, the corrective actions we have committed to in Item 1 will not be completed by that date. Revisions to the 125 V DC system calculations have taken longer to prepare than planned. These calculations were received from our contractor on September 22, 1998, and are in the process of being reviewed. Although we anticipate completing our initial review of these calculations within the next week, additional time for the comment resolution process is needed. Additional revisions, if required, and final approval of the caiculations will be completed by November 30, 1998.

As committed in the second part of Item 1, during the preparation of the calculation revisions, this set of calculations was reviewed to determine if the calculations could be restructured to possibly minimize the number of calculations needing updates for a given design change. We determined that the current calculation set is already minimized. There is very little overlap between the different calculations in the set. Therefore, the current calculation set is not being restructured, since it would not decrease the amount of work needed to reflect a design change.

If you have any questions or require additional information regarding this commitment change, please contact me.

Sincerely,

FON Mark E. Reddemann

Site Vice President

Point Beach Nuclear Plant

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cc: NRC Resident Inspector

NRC Regional Administrator

NRC Project Manager

PSCW