

MAY 21 1986

Docket No. 50-266
Docket No. 50-301

Wisconsin Electric Power Company
ATTN: Mr. C. W. Fay
Vice President
Nuclear Power Department
231 West Michigan, Room 308
Milwaukee, WI 53201

Gentlemen:

The NRC's Office for Analysis and Evaluation of Operational Data (AEOD) has recently completed an assessment of your Licensee Event Reports (LERs) from Point Beach 1 and 2 as part of the NRC's Systematic Assessment of Licensee Performance (SALP).

In general, your submittals were found to be of average quality based on the requirements of 10 CFR 50.73. The basis for these findings can be found in the enclosed assessment.

During the evaluation of these LERs, two similar LERs were reviewed (LERs 84-008-00 and 85-002-00 for Unit 2). Both LERs concern containment isolation valve leakage in excess of technical specifications found during local leakrate testing that was being performed in conjunction with the units' tenth and eleventh refueling, respectively. The concern noted while reviewing these LERs centers on containment isolation valve 755A, a 4-inch, 150 lb, carbon steel, Velan, swing check valve. This valve, as reported in LER 84-008-00 (event date October 5, 1984), had a history of problems (intermittently sticking open that went back over two years. During the tenth refueling, a reason for the intermittent sticking was discovered and corrective action was taken. However, during the next refueling the valve again was discovered to be sticking open for no apparent reason (LER 85-002-00, event date October 22, 1985). At this time the valve underwent "followup maintenance" and was reinstalled for use through yet another fuel cycle, at the end of which it is to be replaced.

Given 755A's past history and the fact that Valve 755B (assumed to be of the same design) also has a leakage problem, we believe that the use of 755A for yet another cycle is not adequately justified in the text discussion for LER 85-002-00. As such, you are requested to submit a revision to LER 85-002-00 detailing all corrective actions taken and expanding on your justification for continued operations with the recurrent problem.

We are providing you a copy of AEOD's assessment prior to the issuance of the SALP 5 Board Report so that you might be aware of their findings and to also provide you a basis by which future submittals should be patterned.

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PDR
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MAY 21 1986

We appreciate your cooperation with us. Please let us know if you have any questions.

Sincerely,

~~*Original Signed by E.G. Greenman*~~

Charles E. Norelius, Director
Division of Reactor Projects

Enclosure: AEOD Assessment

cc w/enclosure:
J. J. Zach, Plant Manager
DCS/RSB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
John J. Duffy, Chief
Boiler Section
Ness Flores, Chairperson
Wisconsin Public Service
Commission

YES
RIII
EJL for
Pearson/lr
4-23-86

YES
RIII
EAR
Schweibinz
4-23-86

RIII
Jackiw

RIII
Greenman

RIII
Gulderson

RIII
Norelius

AEOD INPUT TO SALP REVIEW FOR
POINT BEACH 1 AND 2

Introduction

In order to evaluate the overall quality of the contents of the Licensee Event Reports (LERs) submitted by Point Beach 1 and 2 during the October 1, 1984 to March 31, 1986 Systematic Assessment of Licensee Performance (SALP) assessment period, a representative sample of each unit's LERs was evaluated using a refinement of the basic methodology presented in NUREG/CR-4178.¹ The sample consists of a total of 17 LERs for the station (i.e., 9 LERs for Point Beach 1 and 8 for Point Beach 2), which is all of the LERs that were on file at the time the evaluation was started. Point Beach LERs were evaluated as one sample because it was determined that their LERs are both written and formally reviewed at the station, rather than unit, level. See Appendix A for a list of the LER numbers in the sample.

It was necessary to start the evaluation before the end of the SALP assessment period because the input was due such a short time after the end of the SALP period. Therefore, not all of the LERs prepared during the SALP assessment period were available for review.

Methodology

The evaluation consists of a detailed review of each selected LER to determine how well the content of its text, abstract, and coded fields meet the requirements of NUREG-1022², and Supplements 1³ and 2⁴ to NUREG-1022.

The evaluation process for each LER is divided into two parts. The first part of the evaluation consists of documenting comments specific to the content and presentation of each LER. The second part consists of determining a score (0-10 points) for the text, abstract, and coded fields of each LER.

ATTACHMENT B

The LER specific comments serve two purposes: (1) they point out what the analysts considered to be the specific deficiencies or observations concerning the information pertaining to the event, and (2) they provide a basis for a count of general deficiencies for the overall sample of LERs that was reviewed. Likewise, the scores serve two purposes: (1) they serve to illustrate in numerical terms how the analysts perceived the content of the information that was presented, and (2) they provide a basis for the overall score determined for each LER. The overall score for each LER is the result of combining the scores for the text, abstract, and coded fields (i.e., $0.6 \times \text{text score} + 0.3 \times \text{abstract score} + 0.1 \times \text{coded fields score} = \text{overall LER score}$).

The results of the LER quality evaluation are divided into two categories: (1) detailed information and (2) summary information. The detailed information, presented in Appendices A through D, consists of LER sample information (Appendix A), a table of the scores for each sample LER (Appendix B), tables of the number of deficiencies and observations for the text, abstract and coded fields (Appendix C), and comment sheets containing narrative statements concerning the contents of each LER (Appendix D). When referring to these appendices, the reader is cautioned not to try to directly correlate the number of comments on a comment sheet with the LER scores, as the analyst has flexibility to consider the magnitude of a deficiency when assigning scores.

Although the purpose of this evaluation is to assess the content of the individual LERs selected for review, the analysts often make other observations which they believe should be brought to the attention of the licensee. The following discussion addresses a general observation that was noted during the evaluation.

General Observation

During the evaluation, two similar LERs were reviewed (LERs 84-008-00 and 85-002-00 for Unit 2). Both LERs concern containment isolation valve leakage in excess of technical specifications found during local leakrate

testing that was being performed in conjunction with the units' tenth and eleventh refueling, respectively. The concern noted while reviewing these LERs centers on containment isolation valve 755A, a 4-inch, 150 lb, carbon steel, Velan, swing check valve. This valve, as reported in LER 84-008-00, (event date 10-05-84) had a history of problems (intermittently sticking open) that went back over two years. During the tenth refueling, a reason for the intermittent sticking was discovered and apparently fixed; however, during the next refueling the valve again was discovered to be sticking open for no apparent reason (LER 85-002-00, event date 10-22-85). At this time the valve underwent "follow-up maintenance" and was reinstalled for use through yet another fuel cycle, at the end of which it is to be replaced.

Given 755A's past history and the fact that Valve 755B (assumed to be a valve of the same design) also has a leakage problem, the analysts believe that the use of 755A for yet another cycle is not adequately justified in the text discussion for LER 85-002-00. It appears that this valve should have been changed out during the eleventh refueling or some special administrative procedures should have been put in place to ensure isolation of this potential leakage path, if required.

Discussion of Results

A discussion of the analysts' conclusions concerning LER quality is presented below. These conclusions are based solely on the results of the evaluation of the contents of the LERs selected for review and as such represent the analysts' assessment of the station's performance (on a scale of 0 to 10) in submitting LERs that meet the requirements of 10 CFR 50.73(b). Point Beach 1 and 2 LERs were evaluated as one sample, rather than two separate samples, because it was determined that the Point Beach LERs are both written and formally reviewed at the station, rather than the unit, level.

Table 1 presents the average scores for the sample of LERs evaluated for Point Beach 1 and 2. The reader is cautioned that the scores resulting from the methodology used for this evaluation are not directly comparable to the scores contained in NUREG/CR-4178 due to refinements in the methodology. In order to place the scores provided in Table 1 in perspective, the distribution of the overall average score for all licensees that have been evaluated using the current methodology is provided on Figure 1. Additional scores are added to Figure 1 each month as other licensees are evaluated. Table 2 and Appendix Table B-1 provide a summary of the information that is the basis for the average scores in Table 1. For example, Point Beach's average score for the text of the LERs that were evaluated is 7.3 out of a possible 10 points. From Table 2 it can be seen that the text score actually results from the review and evaluation of 17 different requirements ranging from the discussion of plant operating conditions before the event [10 CFR 50.73(b)(2)(ii)(A)] to text presentation. The percentage scores in the text summary section of Table 2 provide an indication of how well each text requirement was addressed by the station for the 17 LERs that were evaluated.

Discussion of Specific Deficiencies

A review of the percentage scores presented in Table 2 will quickly point out where the station is experiencing the most difficulty in preparing LERs. For example, requirement percentage scores of less than 75 indicate that the station probably needs additional guidance concerning these requirements. Scores of 75 or above, but less than 100, indicate that the station probably understands the basic requirement but has either: (1) excluded certain less significant information from most of the discussions concerning that requirement or (2) totally failed to address the requirement in one or two of the selected LERs. The station should review the LER specific comments presented in Appendix D in order to determine why it received less than a perfect score for certain requirements. The text requirements with a score of less than 75 are discussed below in their order of importance. In addition, the primary deficiencies in the abstract and coded fields are discussed.

TABLE 1. SUMMARY OF SCORES^a FOR POINT BEACH 1 AND 2

	<u>Average</u>	<u>High</u>	<u>Low</u>
Text	7.3	9.7	4.9
Abstract	7.3	8.9	4.5
Coded Fields	8.1	9.0	6.6
Overall	7.4 ^b	9.0	5.4

a. See Appendix B for a summary of scores for each LER that was evaluated.

b. Overall Average = 60% Text Average + 30% Abstract Average + 10% Coded Fields Average.

Figure 1. Distribution of overall average LER scores

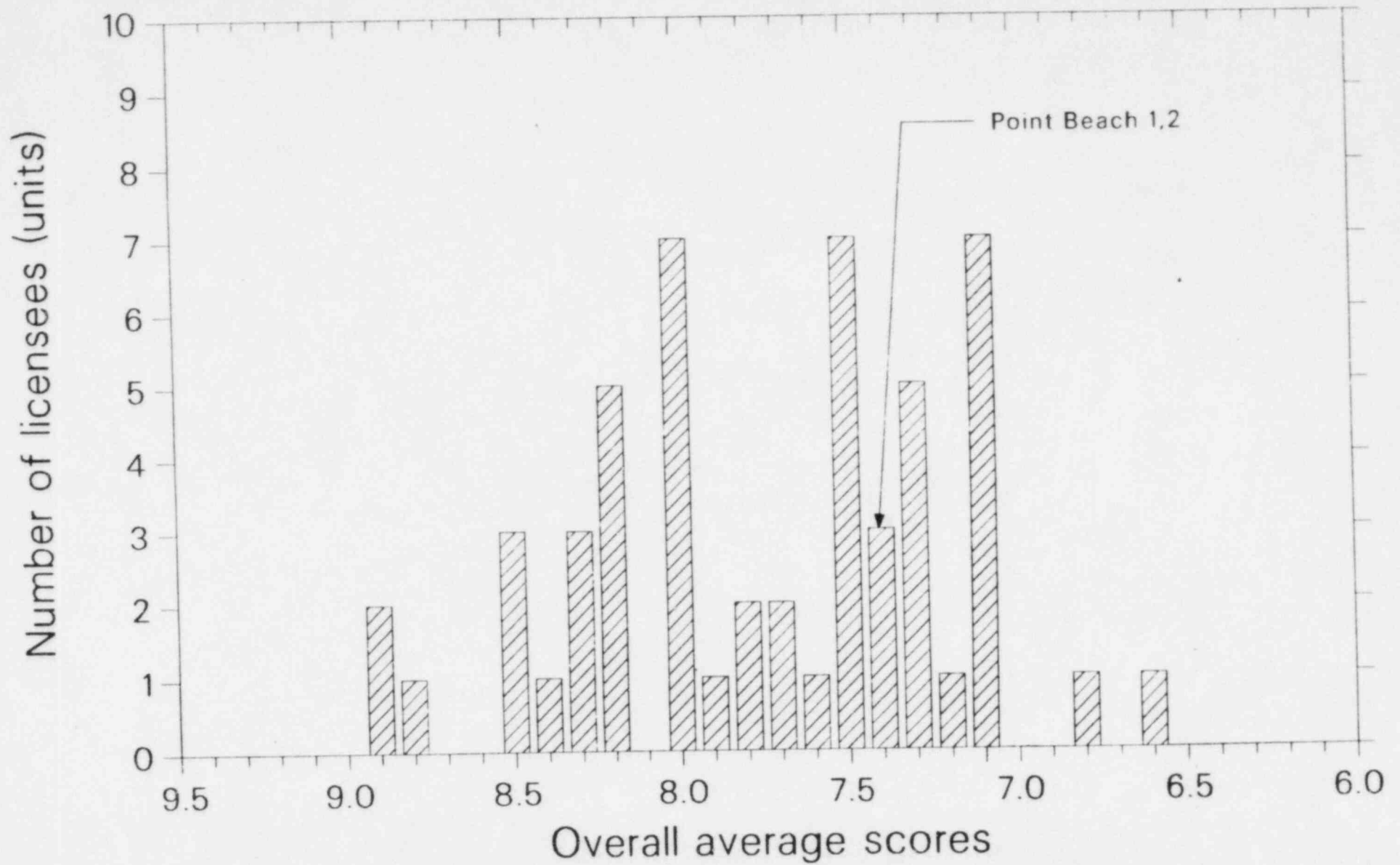


TABLE 2. LER REQUIREMENT PERCENTAGE SCORES FOR POINT BEACH 1 AND 2

TEXT

Requirements [50.73(b)] - Descriptions	Percentage Scores () ^a
(2)(ii)(A) - - Plant condition prior to event	94 (17)
(2)(ii)(B) - - Inoperable equipment that contributed	b
(2)(ii)(C) - - Date(s) and approximate times	75 (17)
(2)(ii)(D) - - Root cause and intermediate cause(s)	84 (17)
(2)(ii)(E) - - Mode, mechanism, and effect	100 (8)
(2)(ii)(F) - - EIIS Codes	0 (17)
(2)(ii)(G) - - Secondary function affected	b
(2)(ii)(H) - - Estimate of unavailability	75 (4)
(2)(ii)(I) - - Method of discovery	94 (17)
(2)(ii)(J)(1) - Operator actions affecting course	100 (4)
(2)(ii)(J)(2) - Personnel error (procedural deficiency)	88 (8)
(2)(ii)(K) - - Safety system responses	75 (10)
(2)(ii)(L) - - Manufacturer and model no. information	53 (9)
(3) - - - - - Assessment of safety consequences	49 (17)
(4) - - - - - Corrective actions	80 (17)
(5) - - - - - Previous similar event information	32 (17)
(2)(i) - - - - Text presentation	74 (17)

ABSTRACT

Requirements [50.73(b)(1)] - Descriptions	Percentage Scores () ^a
- Major occurrences (Immediate cause and effect information)	98 (17)
- Description of plant, system, component, and/or personnel responses	89 (9)
- Root cause information	79 (17)
- Corrective Action information	34 (17)
- Abstract presentation	70 (17)

TABLE 2. (continued)

<u>CODED FIELDS</u>		Percentage
<u>Item Number(s) - Description</u>		<u>Scores ()^a</u>
1, 2, and 3	- Facility name (unit no.), docket no. and page number(s)	93 (17)
4 - - - - -	Title	58 (17)
5, 6, and 7	- Event date, LER No., and report date	91 (17)
8 - - - - -	Other facilities involved	100 (17)
9 and 10 - -	Operating mode and power level	76 (17)
11 - - - - -	Reporting requirements	97 (17)
12 - - - - -	Licensee contact information	100 (17)
13 - - - - -	Coded component failure information	91 (17)
14 and 15 - -	Supplemental report information	78 (17)

a. Percentage scores are the result of dividing the total points for a requirement by the number of points possible for that requirement. (Note: Some requirements are not applicable to all LERs; therefore the number of points possible was adjusted accordingly.) The number in parenthesis is the number of LERs for which the requirement was considered applicable.

b. A percentage score for this requirement is meaningless as it is not possible to determine from the information available to the analyst whether this requirement is applicable to a specific LER. It is always given 100% if it is provided and is always considered "not applicable" when it is not.

Ten of the 17 LERs evaluated were considered to be deficient in the area of providing an assessment of the safety consequences and implications of the event, Requirement 50.73(b)(3). Seven of the LERs did not contain any discussion concerning safety consequences and three others lacked certain details necessary to a complete discussion. Every LER is required to contain a discussion of the safety assessment that should be performed after the event. This discussion should state why the event was reported (e.g., a scram, an ESF actuation, or a failed component that could have prevented fulfillment of a safety function). If the conclusion of this discussion is that "there were no safety consequences", sufficient details must be provided to allow the reader to determine how this conclusion was reached. For example, if it was concluded that there were no consequences because there were other systems (or means) available to mitigate the consequences of the safety system failure, these systems or means should be discussed in the text. In addition, each discussion should include information as to whether or not the occurrence could have happened under a set of initial conditions that would have made consequences more severe. If the occurrence could not have occurred under a more severe set of conditions, the text should so state.

The requirement to provide adequate dates and/or times in the text of the LER, Requirement 50.73(b)(2)(ii)(C), was considered to be deficient in nine of the 17 LERs. Sufficient date and/or time information must be included in each LER so that the reader will have a clear picture of the overall time frame of the occurrences being discussed. This requirement becomes increasingly important when an event has a long period of time between initiation and discovery or has a long history of recurrence that must be discussed. The inclusion of adequate date and time information will usually ensure that Requirement 50.73(b)(2)(ii)(H) is met as well.

The manufacturer and/or model number (or other unique identification) was not provided in the text of five of the nine LERs that involved a component failure, Requirement 50.73(b)(2)(ii)(L). Components that fail or whose design contributed to the event should be identified in the text

so that others in the industry can be made aware of potential problems. An event at one station can often lead to the identification of a generic problem, which can be corrected at other plants or stations before they experience a similar event.

Requirement 50.73(b)(5) was not adequately addressed in eleven of the 17 LERs in that their text did not include the necessary information concerning previous similar events. All previous similar events should be appropriately referenced (by LER number if possible) and the history of the on-going problem should be discussed if necessary. If there have been no previous similar events, the text should state this.

The Energy Industry Identification System component function identifier and system name codes were not provided in the text of any of the 17 LERs that were evaluated.

The text presentations received an overall score of 74%. This score can be improved upon by the use of a consistent text outline (see NUREG-1022, Supplement No. 2, Appendices C and D). For example, every text should include outline headings such as: Event Description, Reportability, Cause, Safety Assessment, Corrective Actions, and Similar Occurrences. If applicable, other headings such as: Background, Time sequences, Plant and/or System Responses, System Descriptions or Generic Implications can be added.

Once a basic outline is adopted by all those responsible for writing LERs, the overall quality of the reports will improve, based simply on the fact that every LER will contain at least the minimum information concerning the major elements of each event.

The use of a diagram, such as was provided with LER 85-004-00 Unit 1, is a good practice and is encouraged whenever appropriate. Diagrams or figures that are included with LERs should be appropriately labelled however, so that it is apparent which LER they are apart of should they become separated from Form 366A. A good practice is to include the figure on the Form 366A.

The primary deficiencies for the abstracts involve the summary of the cause and the corrective action information. Seven of the 17 LERs were considered to be deficient in that the abstract failed to adequately summarize the cause information and 16 did not adequately summarize the corrective actions that had been discussed in the text. Cause and corrective actions information must be included in every abstract.

The abstracts were also considered marginal in the area of presentation in that eight abstracts were very brief and failed to contain the necessary information even though space was available for more details. In addition, four abstracts contained information that was not discussed in the text. This latter situation should be checked for during the station's final review process and, when found, the text should be revised to include such information.

The main deficiency in the area of coded fields involves the title, Item (4). All 17 of the titles failed to indicate root cause and six failed to include the link (i.e., circumstances or conditions, which tie the root cause to the result). All of the titles did provide information concerning the result of the event. While the result is considered to be the most important part of the title, cause and link information must be included to make a title complete. An example of a title that only addresses the result might be "Reactor Scram". This is inadequate in that the cause and link are not provided. A more appropriate title might be "Inadvertent Relay Actuation During Surveillance Test LOP-1 Causes Reactor Scram". From this title the reader knows the cause involved either personnel or procedures and testing contributed to the event.

"Operating Mode" and "Power Level" information, Items (9) and (10), respectively, were considered deficient in that the operating mode was not included in eight LERs and the power level was not included in two.

Two LERs failed to commit to a supplemental report, Item (14), even though the cause or corrective actions had not been determined by the time the reports were submitted. Supplemental reports are appropriate and

should be submitted whenever new or revised information becomes available concerning an event, especially information concerning cause and corrective actions. In two of the LERs, neither the "yes" or "no" block was checked for Item (14). One LER (85-004-00, Unit 1) committed to a revised LER by checking "YES" in Item 14 but failed to provide an Expected Submission Date (Item 15) and failed to mention in the text what information was to be provided in the supplemental LER.

Other deficiencies noted in the coded fields are listed below:

Number of LERs	Deficiency
2	Item (1)--Unit number not provided.
1	Item (2)--Docket number not provided.
3	Item (7)--Report date not provided.
2	Item (7)--Report date was greater than 30 days after event or discovery date.
3	Item (12)--No codes provided even though a failure had occurred.

Omissions are the kind of deficiencies that should be easily identified and corrected during the review process. The two deficiencies involving the report date being greater than 30 days after the event or discovery date resulted because the station wanted to wait until a leakrate test was complete so that they could report on the status of all their findings. This is understandable but is not the proper method of delaying a report. Reports must be submitted within 30 days of an event (or discovery) date even if all the required information is not available in 30 days. For these cases, an initial report is to be submitted that provides all known information and commits to a supplemental report (Item 14), which should then contain the necessary information as well as the original information so that the revised (supplemental) report is a "stand alone" document.

Table 3 provides a summary of the areas that need improvement for the Point Beach LERs. For additional and more specific information concerning deficiencies, the reader should refer to the information presented in Appendices C and D. General guidance concerning these requirements can be found in NUREG-1022, Supplement No. 2.

TABLE 3. AREAS MOST NEEDING IMPROVEMENT FOR POINT BEACH LERS

Areas	Comments
Safety assessment information	All LERs should include a detailed safety assessment. The text should discuss whether or not the event could have been worse had it occurred under different but probable circumstances and provide information about backup systems which were available to limit the consequences of the event.
Dates and times/safety train unavailability	Sufficient dates and times should be included in the text to enable the reader to understand the time history of the event and to determine the length of time that safety system trains or components were out of service (if applicable).
Manufacturer and model number information	Component identification information should be included in the text for each component failure or whenever a component is suspected of contributing to the event because of its design.
Previous similar events	Previous similar events should be referenced (e.g., by LER number) or if none are identified, the text should so state.
EIIS codes	EIIS codes should be provided in the text for all systems and/or components discussed in the text.
Text presentation	A consistent outline format should be used by all personnel writing LERs at the station. The use of diagrams and figures is good.
Abstracts	Cause and corrective action information was often inadequate or was not included. Abstracts should summarize the information that is discussed in the text. If it is necessary to include additional information in the abstract, the text should be revised so as to discuss it. Use the space available in the abstract field.

TABLE 3. (continued)

Areas	Comments
Coded fields	
a. Titles	Titles should be written such that they better describe the event. In particular, include the result and root cause of the event and the link between them in all titles.
b. Commitments to supplemental reports	Commit to provide a supplemental report whenever important information is not determined by the time the report is submitted (e.g., cause or corrective action information). The yes or no box should always be checked for Item (14).
c. Failed component information	Provide information in Item (13) whenever the event involves a failed component.
d. Report date	LERs should be submitted within 30 days of the event (or discovery) date. If necessary submit a revised LER at a later date.
e. General: Omissions	An adequate review of the LER prior to submission is necessary to ensure that Items 1-15 are filled in (if required).

REFERENCES

1. B. S. Anderson, C. F. Miller, B. M. Valentine, An Evaluation of Selected Licensee Event Reports Prepared Pursuant to 10 CFR 50.73 (DRAFT), NUREG/CR-4178, March 1985.
2. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022, U.S. Nuclear Regulatory Commission, September 1983.
3. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022 Supplement No. 1, U.S. Nuclear Regulatory Commission, February 1984.
4. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022 Supplement No. 2, U.S. Nuclear Regulatory Commission, September 1985.

APPENDIX A

LER SAMPLE SELECTION
INFORMATION
FOR POINT BEACH 1 AND 2

TABLE A-1. LER SAMPLE SELECTION FOR POINT BEACH 1 AND 2

<u>LER Sample Number</u>	<u>Unit Number</u>	<u>LER Number</u>	<u>Comments</u>
1	1	85-001-00	ESF
2	1	85-002-00	
3	1	85-003-00	SCRAM
4	1	85-004-00	ESF
5	1	85-005-00	
6	1	85-006-00	ESF
7	1	85-007-00	ESF
8	1	85-008-00	
9	1	85-009-00	ESF
10	2	84-005-00	ESF
11	2	84-006-00	ESF
12	2	84-007-00	ESF
13	2	84-008-00	
14	2	85-001-00	ESF
15	2	85-002-00	
16	2	85-003-00	
17	2	85-004-00	

APPENDIX B

EVALUATION SCORES OF
INDIVIDUAL LERs FOR POINT BEACH 1 AND 2

TABLE B-1. EVALUATION SCORES OF INDIVIDUAL LERs FOR POINT BEACH 1 AND 2

	LER Sample Number ^a															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Text	7.7	9.6	6.5	6.6	6.7	4.9	7.4	7.6	7.2	6.2	6.4	6.7	8.1	8.8	6.4	7.4
Abstract	7.4	7.9	6.7	6.5	8.2	6.0	8.8	7.4	7.5	6.0	7.5	4.5	8.9	7.5	8.1	8.0
Coded Fields	8.3	8.8	9.0	7.0	7.0	6.6	7.4	8.5	7.8	8.0	7.5	8.5	8.8	9.0	8.4	7.9
Overall	7.7	9.0	6.8	6.6	7.2	5.4	7.8	7.6	7.3	6.3	6.9	6.2	8.4	8.4	7.1	7.6

	LER Sample Number ^a														AVERAGE
	17	18	19	20	21	22	23	24	25	26	27	28	29	30	
Text	9.7	--	--	--	--	--	--	--	--	--	--	--	--	--	7.3
Abstract	7.1	--	--	--	--	--	--	--	--	--	--	--	--	--	7.3
Coded Fields	9.0	--	--	--	--	--	--	--	--	--	--	--	--	--	8.1
Overall	8.9	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4

a. See Appendix A for a list of the corresponding LER numbers.

APPENDIX C

DEFICIENCY AND OBSERVATION
COUNTS FOR POINT BEACH 1 AND 2

TABLE C-1. TEXT DEFICIENCIES AND OBSERVATIONS FOR POINT BEACH 1 AND 2

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
<u>50.73(b)(2)(11)(A)</u> --Plant operating conditions before the event were not included or were inadequate.		1 (17)
<u>50.73(b)(2)(11)(B)</u> --Discussion of the status of the structures, components, or systems that were inoperable at the start of the event and that contributed to the event was not included or was inadequate.		0 (1)
<u>50.73(b)(2)(11)(C)</u> --Failure to include sufficient date and/or time information.		9 (17)
a. Date information was insufficient.	4	
b. Time information was insufficient.	6	
<u>50.73(b)(2)(11)(D)</u> --The root cause and/or intermediate failure, system failure, or personnel error was not included or was inadequate.		6 (17)
a. Cause of component failure was not included or was inadequate	5	
b. Cause of system failure was not included or was inadequate	0	
c. Cause of personnel error was not included or was inadequate.	1	
<u>50.73(b)(2)(11)(E)</u> --The failure mode, mechanism (immediate cause), and/or effect (consequence) for each failed component was not included or was inadequate.		0 (8)
a. Failure mode was not included or was inadequate		
b. Mechanism (immediate cause) was not included or was inadequate		
c. Effect (consequence) was not included or was inadequate.		

TABLE C-1. (continued)

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
<u>50.73(b)(2)(11)(F)</u> --The Energy Industry Identification System component function identifier for each component or system was not included.		17 (17)
<u>50.73(b)(2)(11)(G)</u> --For a failure of a component with multiple functions, a list of systems or secondary functions which were also affected was not included or was inadequate.		0 (0)
<u>50.73(b)(2)(11)(H)</u> --For a failure that rendered a train of a safety system inoperable, the estimate of elapsed time from the discovery of the failure until the train was returned to service was not included.		1 (4)
<u>50.73(b)(2)(11)(I)</u> --The method of discovery of each component failure, system failure, personnel error, or procedural error was not included or was inadequate.		1 (17)
a. Method of discovery for each component failure was not included or was inadequate	0	
b. Method of discovery for each system failure was not included or was inadequate	1	
c. Method of discovery for each personnel error was not included or was inadequate	0	
d. Method of discovery for each procedural error was not included or was inadequate.	0	

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
<u>50.73(b)(2)(ii)(j)(1)</u> --Operator actions that affected the course of the event including operator errors and/or procedural deficiencies were not included or were inadequate.		0 (4)
<u>50.73(b)(2)(ii)(j)(2)</u> --The discussion of each personnel error was not included or was inadequate.		3 (17)
a. OBSERVATION: A personnel error was implied by the text, but was not explicitly stated.	0	
b. <u>50.73(b)(2)(ii)(j)(2)(i)</u> --Discussion as to whether the personnel error was cognitive or procedural was not included or was inadequate.	2	
c. <u>50.73(b)(2)(ii)(j)(2)(ii)</u> --Discussion as to whether the personnel error was contrary to an approved procedure, was a direct result of an error in an approved procedure, or was associated with an activity or task that was not covered by an approved procedure was not included or was inadequate.	0	
d. <u>50.73(b)(2)(ii)(j)(2)(iii)</u> --Discussion of any unusual characteristics of the work location (e.g., heat, noise) that directly contributed to the personnel error was not included or was inadequate.	0	
e. <u>50.73(b)(2)(ii)(j)(2)(iv)</u> --Discussion of the type of personnel involved (i.e., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) was not included or was inadequate.	1	

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
50.73(b)(2)(11)(K)--Automatic and/or manual safety system responses were not included or were inadequate.		3 (10)
50.73(b)(2)(11)(L)--The manufacturer and/or model number of each failed component was not included or was inadequate.		5 (9)
50.73(b)(3)--An assessment of the safety consequences and implications of the event was not included or was inadequate.		10 (17)
a. OBSERVATION: The availability of other systems or components capable of mitigating the consequences of the event was not discussed. If no other systems or components were available, the text should state that none existed.	1	
b. OBSERVATION: The consequences of the event had it occurred under more severe conditions were not discussed. If the event occurred under what were considered the most severe conditions, the text should so state.	1	
50.73(b)(4)--A discussion of any corrective actions planned as a result of the event including those to reduce the probability of similar events occurring in the future was not included or was inadequate.		7 (17)

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
a. A discussion of actions required to correct the problem (e.g., return the component or system to an operational condition or correct the personnel error) was not included or was inadequate.	0	
b. A discussion of actions required to reduce the probability of recurrence of the problem or similar event (correct the root cause) was not included or was inadequate.	2	
c. OBSERVATION: A discussion of actions required to prevent similar failures in similar and/or other systems (e.g., correct the faulty part in all components with the same manufacturer and model number) was not included or was inadequate.	1	
<u>50.73(b)(5)</u> --Information concerning previous similar events was not included or was inadequate.		11 (17)

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
50.73(b)(2)(1)--Text presentation inadequacies.		4 (17)
a. OBSERVATION: A diagram would have aided in understanding the text discussion.	1	
b. Text contained undefined acronyms and/or plant specific designators.	1	
c. The text contains other specific deficiencies relating to the readability.	3	

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, (e.g., an LER can be deficient in the area of both date and time information), the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more requirement deficiencies or observations. The number in parenthesis is the number of LERs for which the requirement was considered applicable.

TABLE C-2. ABSTRACT DEFICIENCIES AND OBSERVATIONS FOR POINT BEACH 1 AND 2

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
A summary of occurrences (immediate cause and effect) was not included or was inadequate		1 (17)
A summary of plant, system, and/or personnel responses was not included or was inadequate.		3 (9)
a. Summary of plant responses was not included or was inadequate.	0	
b. Summary of system responses was not included or was inadequate.	3	
c. Summary of personnel responses was not included or was inadequate.	1	
A summary of the root cause of the event was not included or was inadequate.		7 (17)
A summary of the corrective actions taken or planned as a result of the event was not included or was inadequate.		16 (17)

TABLE C-2. (continued)

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
Abstract presentation inadequacies		10 (17)
a. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text, therefore, the text should discuss all information summarized in the abstract.	4	
b. The abstract was greater than 1400 characters	0	
c. The abstract contains undefined acronyms and/or plant specific designators.	1	
d. The abstract contains other specific deficiencies (i.e., poor summarization, contradictions, etc.)	8	

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, (e.g., an LER can be deficient in the area of both date and time information), the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more deficiency or observation. The number in parenthesis is the number of LERs for which a certain requirement was considered applicable.

TABLE C-3. CODED FIELDS DEFICIENCIES AND OBSERVATIONS FOR POINT BEACH 1 AND 2

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
Facility Name		2 (17)
a. Unit number was not included or incorrect.	2	
b. Name was not included or was incorrect.	0	
c. Additional unit numbers were included but not required.	0	
Docket Number was not included or was incorrect.		1 (17)
Page Number was not included or was incorrect.		0 (17)
Title was left blank or was inadequate		17 (17)
a. Root cause was not given in title	17	
b. Result (effect) was not given in title	0	
c. Link was not given in title	6	
Event Date		1 (17)
a. Date not included or was incorrect.	1	
b. Discovery date given instead of event date.	0	
LER Number was not included or was incorrect		0 (17)
Report Date		5 (17)
a. Date not included	3	
b. OBSERVATION: Report date was not within thirty days of event date (or discovery date if appropriate).	2	
Other Facilities information in field is inconsistent with text and/or abstract.		0 (17)
Operating Mode was not included or was inconsistent with text or abstract.		8 (17)

TABLE C-3. (continued)

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
Power level was not included or was inconsistent with text or abstract		2 (17)
Reporting Requirements		1 (17)
a. The reason for checking the "OTHER" requirement was not specified in the abstract and/or text.	0	
b. OBSERVATION: It would have been more appropriate to report the event under a different paragraph.	0	
c. OBSERVATION: It would have been appropriate to report this event under additional unchecked paragraphs.	1	
Licensee Contact		0 (17)
a. Field left blank		
b. Position title was not included		
c. Name was not included		
d. Phone number was not included.		
Coded Component Failure Information		3 (17)
a. One or more component failure sub-fields were left blank.	0	
b. Cause, system, and/or component code is inconsistent with text.	0	
c. Component failure field contains data when no component failure occurred.	0	
d. Component failure occurred but entire field left blank.	3	

TABLE C-3. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
Supplemental Report		5 (17)
a. Neither "Yes"/"No" block of the supplemental report field was checked.	2	
b. The block checked was inconsistent with the text.	3	
Expected submission date information is inconsistent with the block checked in Item (14).		1 (17)

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, (e.g., an LER can be deficient in the area of both date and time information), the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more requirement deficiencies or observations. The number in parenthesis is the number of LERs for which a certain requirement was considered applicable.

APPENDIX D

LER COMMENT SHEETS FOR
POINT BEACH 1 AND 2

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
1. LER Number: 85-001-00	
Scores: Text = 7.7 Abstract = 7.4 Coded Fields = 8.3 Overall = 7.7	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(C)</u>--Provide the approximate time for all major occurrences that are discussed (e.g., the time that the injection was reset and the cooldown resumed). 2. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 3. <u>50.73(b)(4)</u>--A supplemental report appears to be needed to describe the procedural changes. Without a commitment to submit a supplemental report, this LER must be considered incomplete. 4. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included. 2. <u>Item (14)</u>--The block checked is inconsistent with information in the text (see text comment 3).

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
2. LER Number: 85-002-00	
Scores: Text = 9.6 Abstract = 7.9 Coded Fields = 8.8 Overall = 9.0	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(C)</u>--The summary of the operating history of fuel assembly H9 is very informative. 2. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included (i.e., Chemical and Volume Control System EIIS-CB).
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included. 2. Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included. 2. <u>Item (5)</u>--Event date is incorrect. The May 15, 1985 date is mentioned in the abstract and the attached cover letter, but is never mentioned in the text. The failed fuel rod cladding was discovered on April 27, 1985. This should be the event date for this LER.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
3. LER Number: 85-003-00	
Scores: Text = 6.5 Abstract = 6.7 Coded Fields = 9.0 Overall = 6.8	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 2. <u>50.73(b)(2)(ii)(K)</u>--Discussion of automatic and/or manual safety system responses is not included. In addition, what was the alternate source of power during the time the white bus was out of service? 3. <u>50.73(b)(2)(ii)(L)</u>--Identification (e.g. manufacturer and model no.) of the failed component(s) discussed in the text is not included. 4. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included. 5. <u>50.73(b)(4)</u>--Discussion of corrective actions taken or planned is inadequate. Will the procedure for loading the inverter be changed? 6. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state. 7. A logical transition does not exist between all ideas. Some ideas are not presented clearly (hard to follow).
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of system responses is inadequate. See text comment number 2. 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included. 3. Abstract does not adequately summarize the text. Additional space is available within the abstract field to provide the necessary information but it was not utilized. The problem encountered during inverter loading was not summarized.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
3. LER Number: 85-003-00 (continued)	
Coded Fields	<ol style="list-style-type: none"><li data-bbox="439 466 1245 493">1. <u>Item (4)</u>--Title: Root cause is not included.<li data-bbox="439 527 1129 566">2. <u>Item (7)</u>--Report date is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
4. LER Number: 85-004-00	
Scores: Text = 6.6 Abstract = 6.5 Coded Fields = 7.0 Overall = 6.6	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(D)</u>--The root and/or intermediate cause discussion for the component failure is inadequate. The discussion should go further in explaining the switch failure. Is it normal for rain water to get into the switch and relay cabinet? How did the oil get into the relay and where did it come from? 2. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 3. <u>50.73(b)(2)(11)(L)</u>--Identification (e.g. manufacturer and model no.) of the failed component(s) discussed in the text is not included. 4. <u>50.73(b)(3)</u>--OBSERVATION: The consequences of the event had it occurred under more severe conditions should be discussed. If the event occurred under what are considered the most severe conditions, the text should so state. 5. <u>50.73(b)(4)</u>--Will anything be done to prevent oil and water from entering the components in the future (see text comment 1)? 6. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state. 7. Acronym(s) and/or plant specific designator(s) are undefined.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause is inadequate. Mention the oil and water in the pressure switches. 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. Mention that the switches will be replaced and switches in Unit 2 will be inspected. 3. Abstract contains acronym(s) and/or plant specific designator(s) which are undefined.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
4. LER Number: 85-004-00 (continued)	
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included. 2. <u>Item (9)</u>--Operating mode is not included. 3. <u>Item (10)</u>--Power level is not included. 4. <u>Item (13)</u>--Include a line for the switches. 5. <u>Item (14)</u>--The block checked is inconsistent with information in the text. If a supplemental report is needed, the text should indicate what new data will be provided. 6. <u>Item (15)</u>--Expected Submission Date is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
5. LER Number: 85-005-00	
Scores: Text = 6.7	Abstract = 8.2
	Coded Fields = 7.0
	Overall = 7.2
Text	<ol style="list-style-type: none"> <li data-bbox="439 512 1376 704">1. <u>50.73(b)(2)(11)(C)</u>--Date information for occurrences is inadequate. The dates given for the movement and storage history of the spent fuel assemblies is good, however, no date is given in the text for when the Quality Assurance Audit discovered the Technical Specification violation. <li data-bbox="439 736 1376 927">2. <u>50.73(b)(2)(11)(D)</u>--The root and/or intermediate cause discussion for the personnel error is inadequate. Why weren't the personnel responsible for the movement and storage of the spent fuel assemblies aware of the Technical Specification limitations? <li data-bbox="439 959 1376 1087">3. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. <li data-bbox="439 1119 1376 1310">4. <u>50.73(b)(2)(11)(J)(2)</u>--Discussion of personnel error is inadequate. It appears from the corrective action involving the revision of the fuel transfer authorization (Form RE-T1), that this event was a result of the lack of knowledge of the Technical Specification by the personnel involved. <li data-bbox="439 1342 1376 1704">5. <u>50.73(b)(4)</u>--Discussion of corrective actions taken or planned is inadequate. The revision of the fuel transfer authorization (Form RE-T1) to insure compliance with this Technical Specification limitation is good; however, it would seem that those personnel responsible for the movement and storage of the fuel should already be aware of all Technical Specifications that involve fuel movement and storage. Were any other corrective actions, such as additional training on Technical Specifications that apply to fuel handling and storage, planned? <li data-bbox="439 1736 1376 1830">6. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
5. LER Number: 85-005-00 (continued)	
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause is not included. 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. The revisions planned for Form RE-T1 should have been mentioned.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause and link are not included. 2. <u>Item (9)</u>--Operating mode is not included. 3. <u>Item (10)</u>--Power level is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
6. LER Number: 85-006-00	
Scores: Text = 4.9 Abstract = 6.0 Coded Fields = 6.6 Overall = 5.4	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(C)</u>--Time information for occurrences is inadequate. When was the red inverter taken out of service? 2. <u>50.73(b)(2)(11)(D)</u>--The root and/or intermediate cause discussion for the voltage spike is inadequate. What was done to try to determine the origin of the spike? 3. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 4. <u>50.73(b)(2)(11)(H)</u>--A time estimate of the unavailability of the failed system is not included. At what time (date) was the inverter returned to service? See comment number 1. 5. <u>50.73(b)(2)(11)(K)</u>--Discussion of automatic and/or manual safety system responses is inadequate. The involved instruments and systems, which operated as designed, should be listed. What was the alternate power source when the red inverter was taken out of service? 6. <u>50.73(b)(2)(11)(L)</u>--Identification (e.g. manufacturer and model no.) of the failed component(s) discussed in the text is not included. Manufacturer and model number of the inverter should be provided. 7. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included. 8. <u>50.73(b)(4)</u>--It is realized that without knowing cause, corrective actions can not be determined, but extra actions should be taken to try to determine the cause. 9. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
6. LER Number: 85-006-00 (continued)	
Abstract	<p>10. The text is too short to provide the level of information necessary to satisfy the requirements of 50.73(b)(2).</p> <p>1. <u>50.73(b)(1)</u>--Summary of occurrences [immediate cause(s) and effects(s)] is inadequate. Channel 41 and the dropped rod signal should have been mentioned.</p> <p>2. <u>50.73(b)(1)</u>--Summary of component and system responses is inadequate. See text comment number 5.</p> <p>3. <u>50.73(b)(1)</u>--Summary of cause information is inadequate. The abstract should indicate that the voltage spike was considered to be of unknown origin.</p> <p>4. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. The abstract should state that no corrective actions were considered because the cause could not be determined.</p> <p>5. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text; therefore, the text should discuss all information summarized in the abstract.</p> <p>6. Abstract does not adequately summarize the text. Additional space is available within the abstract field to provide the necessary information but it was not utilized.</p>
Coded Fields	<p>1. <u>Item (1)</u>--Unit number is not included.</p> <p>2. <u>Item (4)</u>--Title: Root cause and link (red instrument bus) are not included.</p> <p>3. <u>Item (9)</u>--Mode number or "N" is not included.</p> <p>4. <u>Item (13)</u>--Information should probably have been provided on the inverter as it appears to be the source of the spike.</p> <p>5. <u>Item (14)</u>--Neither "Yes"/"No" block of the supplemental report field is checked.</p>

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
7. LER Number: 85-007-00	
Scores: Text = 7.4 Abstract = 8.8 Coded Fields = 7.4 Overall = 7.8	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(C)</u>--Give the approximate time that the reactor was returned to 100% power. 2. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 3. <u>50.73(b)(2)(11)(I)</u>--Discussion of the method of discovery of the system failure is not included. 4. <u>50.73(b)(3)</u>--One safety concern not discussed appears to be the possible disturbance of other safety systems during installation of packing in other penetrations, even with a new procedure. Will the operators be made aware of possible system perturbations when the contractor is working on a penetration in the future? 5. <u>50.73(b)(4)</u>--A supplemental report appears to be needed to describe the final corrective actions. Without a commitment to submit a supplemental report, this LER must be considered incomplete. 6. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. Mention the possible long term actions: improving the present packing procedures or demonstrating through a study that the practice of backfitting packing into conduits is not necessary.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause and link are not included. 2. <u>Item (9)</u>--Operating mode is not included. 3. <u>Item (14)</u>--Neither "Yes"/"No" block of the supplemental report field is checked.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
8. LER Number: 85-008-00	
Scores: Text = 7.6 Abstract = 7.4 Coded Fields = 8.5 Overall = 7.6	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 2. <u>50.73(b)(2)(11)(L)</u>--Identification (e.g. manufacturer and model no.) of the failed component(s) discussed in the text is not included. Information that would help others determine if this airlock system exists at their facility should be included. 3. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state. 4. Some ideas are not presented clearly (hard to follow). The last sentence of page 2 states "the root cause of the failure of the mechanical interlock system appears to be the size of the mechanical parts of the interlock system compared to the massive nature of the airlock doors". The fourth paragraph on page 3 states that "the physical sizes of the cam and shaft parts in the interlock system are believed to be large enough to provide interlock capability under normal conditions". These sentences seem to contradict each other. What are "normal conditions"?
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause is not included. The cause information provided in the text should have been summarized in the abstract. 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. Some of the long term correct actions designed to prevent recurrence should have been mentioned.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included. 2. <u>Item (9)</u>--Operating mode is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 1 (266)

Section	Comments
9. LER Number: 85-009-00	
Scores: Text = 7.2 Abstract = 7.5 Coded Fields = 7.8 Overall = 7.3	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 2. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included. 3. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included. Additional space is available within the abstract field to provide the necessary information but it was not utilized. 2. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text; therefore, the text should discuss all information summarized in the abstract.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (1)</u>--Unit number is not included. 2. <u>Item (4)</u>--Title: Root cause and link are not included. Note that LER 85-006-00 and this LER have exactly the same title while the events are quite different as to cause and link. 3. <u>Item (9)</u>--Operating Mode Number or "N" is not included. 4. A supplemental report might be appropriate to describe any improvements implemented as a result of the investigation to be completed by March 1, 1986.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 2 (301)

Section	Comments
10. LER Number: 84-005-00	
Scores: Text = 6.2 Abstract = 6.0 Coded Fields = 8.0 Overall = 6.3	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(C)</u>--Date and time information for occurrences is not included. 2. <u>50.73(b)(2)(11)(D)</u>--Explain why a procedure is not considered necessary. 3. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 4. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included. 5. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause is inadequate. Be specific in stating the cause (i.e., personnel error). 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included. The title should be specific as to which ESF actuated. 2. <u>Item (7)</u>--Report date is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 2 (301)

Section	Comments
11. LER Number: 84-006-00	
Scores: Text = 6.4 Abstract = 7.5 Coded Fields = 7.5 Overall = 6.9	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(C)</u>--Date and time information for occurrences is not included. 2. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 3. <u>50.73(b)(2)(11)(J)(2)(iv)</u>--Discussion of the type of personnel involved (i.e., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) is not included. 4. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included. 5. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included. 2. Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included. 2. <u>Item (7)</u>--Report date is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 2 (301)

Section	Comments
12. LER Number: 84-007-00	
Scores: Text = 6.7 Abstract = 4.5 Coded Fields = 8.5 Overall = 6.2	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(A)</u>--Discussion of plant operating conditions before the event is not included. Information is provided in the abstract (i.e., "during a refueling shutdown"), but not in the text as is required. 2. <u>50.73(b)(2)(ii)(C)</u>--Time information for occurrences is inadequate. When was breaker 2A52-45 shut to restore normal power? 3. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 4. <u>50.73(b)(2)(ii)(J)(2)</u>--Discussion of personnel error is inadequate. Why didn't the operator realize that breaker 1A52-40 could only be shut locally and not from the control room? Is this guidance that he would get from a SMP? 5. <u>50.73(b)(2)(ii)(K)</u>--Discussion of automatic and/or manual safety system responses is inadequate. The systems and components that "operated as designed" should be named. 6. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included. 7. Some ideas are not presented clearly (hard to follow). (Second sentence of last paragraph.) 8. OBSERVATION: A diagram or figure would aid understanding.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of system, personnel, and component responses is inadequate. See text comment number 5. 2. <u>50.73(b)(1)</u>--Summary of cause information is inadequate.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 2 (301)

Section	Comments
12. LER Number: 84-007-00 (continued)	
	3. <u>50.73(b)(1)</u> --Summary of corrective actions taken or planned as a result of the event is not included.
	4. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text; therefore, the text should discuss all information summarized in the abstract. See text comment number 1.
	5. Abstract does not adequately summarize the text. Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	1. <u>Item (4)</u> --Title: Root cause and link (inspection of wiring) are not included.
	2. The diesel generator should have been named in the title.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 2 (301)

Section	Comments
13. LER Number: 84-008-00	
Scores: Text = 8.1 Abstract = 8.9 Coded Fields = 8.8 Overall = 8.4	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(C)</u>--Include additional dates, such as, when the valve was repaired and the dates of previous problems. 2. <u>50.73(b)(2)(ii)(D)</u>--When a cause cannot be found (i.e., why the bushing migrated), at least list actions that were taken to try to determine the cause. 3. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 4. <u>50.73(b)(2)(ii)(L)</u>--Identification (e.g. manufacturer and model no.) of the failed component(s) discussed in the text is inadequate. Include a model number, if possible. 5. <u>50.73(b)(4)</u>--Discussion of corrective actions taken or planned is inadequate. Will the surveillance on the valve be increased to try to ensure that if the problem does recur, it will be detected earlier? Will other valves (i.e., same manufacturer and model number) be examined for a similar problem?
Abstract	1. No comments.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included. 2. <u>Item (7)</u>--OBSERVATION: Report date is not within thirty days of event date (or discovery date if appropriate). If all the information is not known within 30 days, submit an interim LER and commit to provide a supplemental report when all information is known.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 2 (301)

Section	Comments
14. LER Number: 85-001-00	
Scores: Text = 8.8 Abstract = 7.5 Coded Fields = 9.0 Overall = 8.4	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 2. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included. 2. Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 2 (301)

Section	Comments
15. LER Number: 85-002-00	
Scores: Text = 6.4 Abstract = 8.1 Coded Fields = 8.4 Overall = 7.1	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(C)</u>--Date information for occurrences is inadequate. The date information concerning the delay in reporting that was provided in the cover letter should have been provided in the text as well. 2. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 3. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is inadequate. Given the past leakage history for valve 755A, how can it be assumed that the operator will know to close the outside containment isolation valve that is in series with 755A? 4. <u>50.73(b)(4)</u>--Discussion of corrective actions taken or planned is inadequate. Given the past leakage history for valve 755A, it seems that reinstalling it and waiting for the valve to leak again does not constitute adequate corrective actions unless a contingency plan is proceduralized to address the problem.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. The plan to change the valve during the next Unit 2 refueling outage was not mentioned. 2. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text; therefore, the text should discuss all information summarized in the abstract.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (6)</u>--Docket number is not included on page 1 of 4. 2. <u>Item (4)</u>--Title: Root cause and link are not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 2 (301)

Section	Comments
15. LER Number: 85-002-00 (continued)	
	<ol style="list-style-type: none"><li data-bbox="380 417 1300 587">3. <u>Item (7)</u>--The report date should be within 30 days of the discovery date. If all the information is not known within 30 days, submit an interim LER and commit to provide a supplemental report when all information is known.<li data-bbox="380 651 1300 778">4. <u>Item (13)</u>--Component failure occurred but entire field is blank. Other valves also leaked and required repair and thus, should have been included in Item (13).

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 2 (301)

Section	Comments
16. LER Number: 85-003-00	
Scores: Text = 7.4 Abstract = 8.0 Coded Fields = 7.9 Overall = 7.6	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(D)</u>--The text discussed very thoroughly the testing and corrective actions taken, but failed to give possible reasons for the various failures (e.g., corrosion, fatigue, vibration, etc.). 2. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 3. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause is inadequate. 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. Mention that the tubes will be monitored on a continuing basis.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included. 2. <u>Item (9)</u>--Operating mode is not included. 3. <u>Item (11)</u>--OBSERVATION: It appears it would have been appropriate to also report this event under paragraph(s) 50.73(a)(2)(i). 4. <u>Item (13)</u>--A component code of TBG (tubing) would probably be more appropriate.

TABLE D-1. SPECIFIC LER COMMENTS FOR POINT BEACH 2 (301)

Section	Comments
17. LER Number: 85-004-00	
Scores: Text = 9.7 Abstract = 7.1 Coded Fields = 9.0 Overall = 8.9	
Text	<ol style="list-style-type: none"> 1. This is a well written LER that meets all the requirements of 10 CFR 50.73(b) with the exception that EIIS codes are not used in the text. The reader is left with impression that the licensee is going to great lengths to determine the cause of the cladding failures. Since the licensee is considering what long term corrective action is appropriate, a commitment to a supplemental report might be considered as this type of information can be very valuable to the industry.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included. 2. Additional space is available within the abstract field to provide the necessary information but it was not utilized. 3. <u>Item (4)</u>--Title: Root cause is not included.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (9)</u>--Operating mode is not included.