Wisconsin Electric
POWER COMPANY

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VPNPD-88-324
NRC-88-055

10 CFR 2.201

June 15, 1988

U. S. NUCLEAR REGULATORY COMMISSION
Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
REPLY TO NOTICE OF VIOLATION
50-266/88009-02 AND 50-301/88009-02
POINT BEACH NUCLEAR PLANTS, UNITS 1 AND 2

By letter dated May 16, 1988, Region III transmitted the report of a routine safety inspection at Point Beach Nuclear Plant. The letter stated that certain activities appeared to be in violation of NRC requirements and enclosed a Notice of Violation identifying the matter. Pursuant to 10 CFR 2.201, this letter and the enclosure are in response to the Notice of Violation.

Wisconsin Electric agrees that the violation resulting in the loss of the automatic isolation capability of the containment vent system was properly classified as Severity Level IV. Our corrective actions for this item are provided in the enclosure.

If you have any questions concerning our response, please do not hesitate to contact us.

Very truly yours,

C. W. Fay
Vice President
Nuclear Power

Enclosure

Copies to NRC Resident Inspector
NRC Regional Administrator - Region III

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ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION
50-266/88009-02 AND 50-301/88009-02
POINT BEACH NUCLEAR PLANT

Equipment Isolation Procedures

The Notice of Violation identified a failure to specify the time and date of the planned work activity as a violation of PBNP 4.13, "Equipment Isolation Procedure." As discussed in the inspection report, the violation resulted in the inoperability of the automatic isolation function of containment ventilation. Also as noted in the inspection report, the remote manual isolation capability to isolate containment ventilation was operable.

The Notice of Violation listed four contributing factors to the automatic containment ventilation isolation being inoperable. First the tagout identified the proper DC control breakers, but did not specify when the tagout was required. The tagout had a note in the time and date section to not hang the tags until notified by the requesting group. Additionally, the Notice of Violation stated that reference material which identified those safeguards relays which would be deenergized by the tagout was not available in the control room. The third contributing factor listed by the Notice of Violation was that the requesting group used as a reference a 1984 temporary change to a 1980 minor procedure which allowed two trains of safeguards relays to be deenergized at the same time. Finally the Notice listed a lack of clarity of the relevant Technical Specification of the containment vent and purge valve operability as another factor contributing to the found condition.

The conclusions of our investigation parallel those of the inspection report. We have identified actions which will be taken to reduce the probability of a condition of this type occurring in the future.

1. In accordance with PBNP 4.13, "Equipment Isolation Procedure," the time and date should be included in the request for a tagout. This fact will be reinforced during the review of the Significant Operating Event to be written.

2. It is not feasible to have <u>all</u> reference material available in the control room. Rather we will appropriately revise PBNP 4.13 to strengthen the requirement for the tagout authorizer's supervisor to determine, in concert with the requesting individual and others, that not only is the tagout adequate from an industrial safety viewpoint but also determine what effects it may have on other plant equipment.

3. Supervisors should continue to use procedures used in the past as guidance but must be aware that initial conditions and assumptions may have changed. Item number 2 should provide the second checks necessary to ensure that correct system configurations are maintained.

4. A Technical Specification change request which clarifies the operability requirements for the Purge Supply and Ventilation System has been reviewed by the plant Manager's Supervisory Staff for their approval prior to requesting NRC issuance of a license amendment. This change incorporates the operability requirements for the Purge Supply and Ventilation System suggested by Westinghouse Standardized Technical Specifications.

These corrective actions, including a Technical Specification change request to the NRC, will be completed by November 1, 1988. We will be in full compliance after the revised Technical Specification is approved by the NRC and becomes effective. These changes should reduce the probability of this type of condition occurring again.