



**Wisconsin
Electric**
POWER COMPANY

Point Beach Nuclear Plant
6610 Nuclear Rd., Two Rivers, WI 54241

(414) 755-2321

NPL 97-0447

10 CFR 50.4
10 CFR 50 Appendix R

August 5, 1997

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

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
FIRE PROTECTION / APPENDIX R REBASLINING PROJECT
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

During a recent NRC team inspection of Point Beach Nuclear Plant, we verbally committed to submit the scope and schedule for our Fire Protection/Appendix R Rebaselining Project. Mr. David Butler (NRC Region III) and Mr. Paul Katers (Wisconsin Electric) agreed that this letter would define a date by which a detailed schedule would be available. The requested information is transmitted herein.

Wisconsin Electric began an effort to revalidate and upgrade the Point Beach Nuclear Plant Fire Protection/Appendix R Safe Shutdown Program and documentation in 1993 as a result of weaknesses that had been identified in the original 1983 Appendix R Safe Shutdown analyses. In 1996, we concluded that the Fire Protection/Appendix R Safe Shutdown Program should be rebaselined to better address Appendix R requirements, current industry standards, and interpretations that had been developed since the rule was published in February, 1981. Accordingly, at the end of 1996, a Fire Protection/Appendix R Rebaselining Project was initiated to rebaseline PBNP's program to better demonstrate compliance with the rule and to streamline the program for improved maintenance and configuration control in the future.

The Fire Protection/Appendix R Rebaselining Project systematically reviews the Fire Protection/Appendix R Program. This project is designed to address both validation of the existing program and resolution of identified issues or weaknesses. The project team consists of utility engineers and a group of industry Appendix R experts. The project is expected to be 18 to 24 months in duration.

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The first objective of the project team was to conduct an independent assessment of the existing program for general compliance with PBNP's current design and licensing basis. This review was conducted over a two week period during January and February, 1997. The review confirmed the existence of previously identified weaknesses and prompted a detailed assessment to determine corrective actions necessary prior to Unit 2 restart. Efforts for approximately the past six months have concentrated on completion of Unit 2 restart action items. All such actions required for Unit 2 restart have now been completed.

A draft project schedule was prepared in early 1997. A copy of this draft schedule is attached. Our focus on Unit 2 restart issues for the past six months has, however, impacted our progress toward completion of project tasks in accordance with our original schedule. We are currently reviewing and revising this schedule to reflect the impact of our Unit 2 outage duration and to incorporate lessons learned from our efforts to support Unit 2 restart. *We expect to finalize this project schedule and provide the NRC with a revised detailed project schedule by October 10, 1997.*

Please contact us if you have any questions.

Sincerely,



Douglas F. Johnson
Manager,
Regulatory Services & Licensing

Attachment

cc: NRC Resident Inspector
NRC Regional Administrator
PSCW

DRAFT

Wisconsin Electric Power Company
Appendix R Project Schedule

Project	Budget Hours	Actual Work	Start	Finish	Quarter				2nd Quarter				3rd Quarter				4th Quarter				1st Quarter				2nd
					Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr						
Project Initiation - Task 1	400	0h	2/3/97	3/6/97																					
Safe Shutdown Equip. List Analysis - Task 2	700	0h	3/10/97	4/11/97																					
Functional Analysis - Task 5	1500	0h	3/10/97	7/26/97																					
Circuit Analysis - Task 3	3850	0h	3/10/97	7/26/97																					
Compliance Assessment Analysis - Tasks 6 & 7	3800	0h	7/29/97	1/13/98																					
F.P. Feature Design Compliance - Task 4	5500	0h	2/10/97	3/9/98																					
Manual Action Feasibility Analysis - Task 8	400	0h	1/12/98	3/9/98																					
PPER Revision - Task 10	180	0h	1/12/98	3/9/98																					
Configuration Control Documents - Task 11	500	0h	1/12/98	3/9/98																					
Operations Procedures - Task 9	400	0h	2/4/97	3/31/97																					
RCP Lube Oil Collection - Task 13	400	0h	3/10/97	7/28/97																					
FP QA Review - Task 12	200	0h	2/10/97	3/9/98																					
Project Management	1080	0h	2/3/97	3/9/98																					
Equipment Operability Review - Task 14 (PBNP)	0	0h	1/13/98	3/9/98																					
Implementation - Task 15	400	0h	3/9/98	5/8/98																					