

NOTICE OF VIOLATION

Wisconsin Electric Power Company
Point Beach Nuclear Plant

Docket No. 50-266; 50-301
License No. DPR-24; DPR-27

During an NRC inspection conducted from October 20 through November 7, 1997, violations of NRC requirements were identified. In accordance with NUREG-1600, "General Statement of Policy and Procedure for NRC Enforcement Actions," the violations are listed below:

1. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires in part, that activities affecting quality be prescribed by documented procedures, of a type appropriate to the circumstances and that the activities be accomplished in accordance with these procedures. The procedures are to include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Procedure NP 1.9.15, "Danger Tag Procedure," Revision 3, Section 6.2.1 stated, in part, that the preparer shall fill out the danger tag location sheet with tag sequence numbers. Section 6.3.5 stated, in part, that the qualified tagger shall position equipment/components as specified in the "sequence" column and "required position" column on the danger tag location sheet.

Procedure NP 5.3.7, "Operability Determinations," Attachment A, "Management Expectations for Performing a Written Prompt Operability Determination," described types of conditions that should receive a written operability evaluation if the system, structure, or component was to remain in service. Item 2.6 of this attachment listed one type of condition as "Errors in testing, testing methodology, instrumentation or data that could invalidate surveillance testing that is used to demonstrate continued operability of SSCs [systems, structures, and components]."

Contrary to the above:

- a. Danger tags 97-753 and 97-800 were installed on October 7, 1997, and October 18, 1997, with tag sequence numbers being assigned to the danger tag location sheet.
- b. Although condition report QCR 97-0148, dated July 18, 1997, documented that requirements for testing safety-related relief valves per ASME Section XI 1986-OM-1(1981) were not met in all cases, no prompt operability determination had been completed for all the affected valves as of November 7, 1997.

This is a Severity Level IV violation (Supplement 1).

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2. 10 CFR Part 50, Appendix B, Criterion XII, "Control of Measuring and Test Equipment," requires, in part, that measures be established to assure that instruments and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits.

Contrary to the above, on October 21, 1997, while performing technical specification surveillance procedures 2F 1P 9071-1 "A05 4160/480 Degraded and Loss of Voltage Relay Monthly Surveillance" and 2RMP 9071-2 "A06 4160/480 Degraded and Loss of Voltage Relay Monthly Surveillance" on Unit 2, personnel used an uncalibrated stopwatch to measure the 4.16 kV bus undervoltage relays 2-274/A05, 2-275/A05, 2-276/A05, 2-27-4/A06(27-4), 2-27-5/A06(27-5) and 2-27-6/A06(27-6) pickup time delay setpoint values.

This is a Severity Level IV violation (Supplement I).

3. 10 CFR Part 50 Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures be established to assure that conditions adverse to quality, such as deficiencies and nonconformances, are promptly identified and corrected. Violation 50-266/96002-05(DRP), 50-301/96002-05(DRP), dated April 17, 1996, identified that changes to the plant, systems and parameters were not routinely updated into the final safety analysis report (FSAR).

Contrary to the above, as of November 7, 1997, corrective actions to the above violation were not sufficient to assure that previous changes to plant systems that affected the FSAR were identified and corrected as follows:

- a. During a screening on October 1, 1997, the licensee failed to identify that the FSAR had never been updated to reflect a change to procedures which occurred in 1988.
- b. The licensee had not revised the FSAR to correct the description of the effects of a loss of a transmission line to the plant, although the need for such a revision was identified in 1993.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Wisconsin Electric is hereby required to submit a written statement of explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violation, or if contested, the basis for

disputing the violation or the severity level; (2) the corrective steps taken and the results achieved; (3) the corrective steps to be taken to avoid further violations; and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration may be given to extending your response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information).

Dated at Lisle, Illinois,
this 19th day of February 1998