

JUL 11 1986

Docket Nos. 50-266  
and 50-301

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

Dear Mr. Fay:

SUBJECT: CONFORMANCE TO REGULATORY GUIDE 1.97 FOR THE POINT BEACH NUCLEAR  
PLANT UNITS 1 AND 2

Generic Letter 82-33 requested that licensee's provide a report to the NRC describing how the post-accident monitoring instrumentation meets the guidelines of Regulatory Guide 1.97 Revision 2 as applied to emergency response facilities. You responded to this request by letters dated September 1, 1983, August 30, 1985 and November 27, 1985.

We have completed our review of your responses, the details of which are included in the enclosed staff Safety Evaluation (SE) and attached Technical Evaluation Report (TER) prepared by our contractor EG&G of Idaho.

Based on our review, we find that the Point Beach Nuclear Plant Units 1 and 2 design acceptably conforms to, or has provided acceptable justification for deviation from, Regulatory Guide 1.97 Revision 2. However, as stated in the SE, because the neutron flux instrumentation will only have one environmentally and seismically qualified channel, the staff will require more frequent surveillance intervals as Technical Specifications for this instrumentation than it would for a qualified two channel system. This has

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been discussed with members of your staff. If you have any questions, please contact me at (301) 482-9787.

Sincerely,

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Timothy G. Colburn, Project Manager  
Project Directorate #1  
Division of PWR Licensing-A

Enclosure:  
Safety Evaluation  
with attached Technical  
Evaluation Report

cc's: See Next Page

Office: PM/PAD#1 TGC PD/PAD#1  
Surname: TColburn/tg GLear ✓  
Date: 07/9/86 07/11/86

Mr. C. W. Fay  
Wisconsin Electric Power Company

Point Beach Nuclear Plant  
Units 1 and 2

cc:  
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SAFETY EVALUATION BY THE OFFICE  
OF NUCLEAR REACTOR REGULATION  
FOR THE  
POINT BEACH NUCLEAR PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-266 AND 50-301  
CONFORMANCE TO REGULATORY GUIDE 1.97

INTRODUCTION AND SUMMARY

Wisconsin Electric Power Company (WE) was requested by Generic Letter 82-33 to provide a report to the NRC describing how the post-accident monitoring instrumentation meets the guidelines of Regulatory Guide 1.97 as applied to emergency response facilities. Response specific to Regulatory Guide 1.97 was provided on September 1, 1983. Additional information was provided by letters dated August 30, 1985 and November 27, 1985.

A detailed review and technical evaluation of the licensee's submittals was performed by EG&G Idaho, Inc., under contract to the NRC, with general supervision by the NRC staff. This work was reported by EG&G in their Technical Evaluation Report (TER), "Conformance to Regulatory Guide 1.97, Point Beach Nuclear Plant, Unit Nos. 1 and 2," dated February 1986 (attached). We have reviewed this report and concur with the conclusion that the licensee either conforms to, or is justified in deviating from, the guidance of Regulatory Guide 1.97 for each post-accident monitoring variable.

EVALUATION CRITERIA

Subsequent to the issuance of the generic letter, the NRC held regional meetings in February and March 1983 to answer licensee and applicant questions and concerns regarding the NRC policy on Regulatory Guide 1.97. At these meetings, it was noted that the NRC review would only address exceptions taken to the

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guidance of Regulatory Guide 1.97. Further, where licensees or applicants explicitly state that instrument systems conform to the provisions of the regulatory guide, it was noted that no further staff review would be necessary. Therefore, the review performed and reported by EG&G only addresses exceptions to the guidance of Regulatory Guide 1.97. This Safety Evaluation addresses the licensee's submittals based on the review policy described in the NRC regional meetings and the conclusions of the review as reported by EG&G.

#### EVALUATION

We have reviewed the evaluation performed by our consultant contained in the enclosed TER and concur with its bases and findings. The licensee either conforms to, or has provided an acceptable justification for deviating from, the guidance of Regulatory Guide 1.97 for each post-accident monitoring variable.

However, because the neutron flux instrumentation will have only one channel of instrumentation which is environmentally and seismically qualified, the staff will require that it have more frequent surveillance intervals than a qualified two channel system when this equipment is required to be incorporated into the plant Technical Specifications in the future.

It is also noted that in section 3.3.19 of the enclosed TER it is incorrectly stated that Regulatory Guide 1.97 recommends Category 1 instrumentation for emergency ventilation. The Regulatory Guide actually recommends Category 2 instrumentation. Seismic qualification is therefore not necessarily required.

#### CONCLUSION

Based on the staff's review of the enclosed Technical Evaluation Report, and the licensee's submittals, we find that the Point Beach Nuclear Plant, Unit Nos. 1 and 2, design is acceptable with respect to conformance to Regulatory Guide 1.97, Revision 2. However, the staff will require more frequent surveillance intervals for the neutron flux instrumentation when this equipment is required to be put into future plant technical specifications.

Date:

Principal Contributors:

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Attachment:

Technical Evaluation Report