



Wisconsin Electric POWER COMPANY
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NRC-86-47

June 12, 1986

Mr. J. G. Keppler, Regional Administrator
Office of Inspection and Enforcement,
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attention: Mr. J. J. Harrison, Chief
Engineering Branch

Gentlemen:

DOCKETS 50-266 AND 50-301
RESPONSE TO NOTICE OF VIOLATIONS REGARDING
ENVIRONMENTAL QUALIFICATION OF ELECTRICAL EQUIPMENT
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated May 14, 1986, Wisconsin Electric was notified that two violations of NRC requirements regarding the environmental qualification of electrical equipment had been identified. This letter is in response to that notice of violation, as required by 10 CFR 2.201.

Attachment 1 briefly summarizes each of the two violations and reports the corrective action taken and results achieved, corrective action taken to avoid future violations, and dates of full compliance. It also describes mitigating circumstances for each of the violations.

Should there be any question regarding this matter, please do not hesitate to call us.

Very truly yours,

Sol Burstein
Vice Chairman of the Board

Copy to NRC Resident Inspector

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PDR ADOCK 05000266
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ATTACHMENT 1
RESPONSE TO NOTICE OF VIOLATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

- A. Item 50-266/85013-02 (DRS)
50-301/85013-02 (DRS)

SUMMARY OF VIOLATION

Contrary to the requirements of 10 CFR 50.49, the Foxboro N-E10 series auxiliary feedwater flow transmitters FT-4036 and FT-4037 in both units were not installed or maintained in a manner necessary to achieve a qualified status, consistent with the material in the EQ file. When these problems were discovered, there was no documented review for reportability under 10 CFR 50.72 and 10 CFR 50.73, nor was a timely engineering review by cognizant engineers documented evaluating the consequences of the above discrepancies.

CORRECTIVE ACTION

The required "Style B" amplifiers were installed in the Unit 1 transmitters on May 22, 1985. All maintenance items required to establish qualification were then completed, and the transmitters were qualified as of that date.

The Unit 2 transmitters had the proper amplifier installed on August 26, 1985. All maintenance requirements were then accomplished and qualification was established on that date. The transmitters are, therefore, environmentally qualified, as documented in the EQ file.

These transmitters are continuing to be properly maintained in accordance with the associated Equipment Qualification Maintenance Requirement (EQMR) sheets. These EQ requirements have been incorporated into the Instrument and Control EQ Preventive Maintenance Call-Up File at Point Beach.

PREVENTATIVE ACTION

The reduced capability of these transmitters was discovered by Wisconsin Electric during the creation of a system controlling and documenting maintenance for environmentally qualified instrumentation. The current Nuclear Engineering administrative procedure requires that all EQ equipment, requiring maintenance activities to keep a qualified status, be identified to plant maintenance personnel on EQMR sheets for incorporation into routine maintenance activity schedules. This procedure has proven its effectiveness in preventing future occurrences by ensuring all equipment requiring special maintenance action is called out to the appropriate maintenance group. This procedure is planned to be upgraded in 1986 and incorporated into the Nuclear Power Department's Quality Assurance Procedures Manual, which contains procedures which control the QA activities of all groups within the Nuclear Power Department. These actions should prevent future occurrences of EQ equipment inadvertently missing maintenance and surveillance activities.

In order to address the concern of missing or untimely documentation of a reportability review, a new Quality Assurance Procedure concerning Control of Nonconformances has been issued as of March 1, 1986, which specifically requires documenting consideration of reportability under various regulations. This procedure also documents corrective actions and evaluations of the nonconforming condition, thereby ensuring a timely, documented engineering review of safety consequences by cognizant personnel. These controls should, therefore, prevent future occurrences of poorly documented reportability reviews or evaluation of the safety consequences under similar circumstances.

DATES OF FULL COMPLIANCE

Full compliance for Unit 1 was achieved on May 22, 1985.
Full compliance for Unit 2 was achieved on August 26, 1985.

MITIGATING CIRCUMSTANCES

- A. The problem with these transmitters was identified by Wisconsin Electric and discussed with NRC personnel at the entrance meeting of the NRC EQ inspection.
 - B. Prompt corrective action was taken by Wisconsin Electric to establish qualification as quickly as possible without jeopardizing plant safety.
 - C. While not documented, Wisconsin Electric did review the problem for reportability and found that no report was required. This was supported by a similar conclusion made later by the inspection team. Documentation of such a result is not required by 10 CFR 50.72, 10 CFR 50.73, or 10 CFR 50 Appendix B requirements.
 - D. The affected transmitters are not safety related. They provide post-accident monitoring information, which could also be determined from alternate indications.
 - E. The installed transmitters were capable of surviving their design basis harsh environment. This was documented on a Nonconformance Report (NCR) prepared prior to the NRC EQ inspection.
- B. Item 50-266/85013-03 (DRS)
50-301/85013-03 (DRS)

SUMMARY OF VIOLATION

The Rockbestos Co. coaxial cable used in the testing of the General Atomics high-range radiation monitor was not subjected to thermal aging prior to exposure to a LOCA/HELB environment; therefore, the cable could not be considered qualified.

CORRECTIVE ACTION

Prior to the inspector's review of the high-range radiation monitor file, an analysis showing that thermal exposure of 40 years at Point Beach would not significantly affect the capability of the materials of the coaxial cable was included in the file. It should also be noted that the file contained a report from Rockbestos Co. which independently demonstrated the cable's capabilities. In addition, Rockbestos Co. undertook a program to reaffirm the cable's capability to perform under harsh accident environments.

The results of this test, which was closely monitored by the NRC and followed by Wisconsin Electric personnel, demonstrates the qualification of the cable. The results of this test, which confirm the results of the previous testing and analysis, were placed in the appropriate EQ file.

PREVENTATIVE ACTION

To prevent future similar problems, the Quality Assurance Section of the Nuclear Power Department has been actively involved in EQ testing programs. This includes auditing of facilities, witnessing tests, and reviewing EQ documentation. Review of documentation to ensure complete environmental qualification of new equipment is occurring in the Nuclear Power Department, in accordance with appropriate administrative procedures. These activities and procedures should prevent future occurrences.

DATE OF FULL COMPLIANCE

Prior to November 30, 1985, an interim report on qualification testing in progress on Rockbestos coaxial cable was received, reviewed, and found acceptable for Point Beach. The final Rockbestos test report is currently being reviewed by Wisconsin Electric engineers. It confirms the capability of the cable, essentially as previously reported by Rockbestos. Wisconsin Electric was, therefore, in full compliance by November 30, 1985.

MITIGATING CIRCUMSTANCES

- A. Wisconsin Electric had aggressively pursued resolution of the qualification status of Rockbestos cable, both in determining its capability and in resolving the quality of its documentation.
- B. We believe that we had in our files sufficient evidence to document the qualification of this cable. Apparently the material in our file analyzing the cable's capability to survive a design basis event following 40 years of use was judged not to be adequate by the inspector. Note that, in accordance with 10 CFR 50.49 (f)(4), analysis in combination with partial type test data is an acceptable qualification method.

- C. As a result of the retest program conducted by Rockbestos Cable Co., it has been shown that the original test results and conclusions drawn from them about the capabilities of the Rockbestos cable were correct.
- D. This equipment is not safety related. It performs only in a post-accident monitoring role for which alternate detection methods are available.