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February 4, 1987

Document Control Desk
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
ADDITIONAL RESPONSE TO INSPECTION REPORT
50-266/86016(DRSS) AND 50-301/86015(DRSS)
POINT BEACH NUCLEAR PLANT

This is in response to your letter dated November 5, 1986 regarding inspections conducted on August 7-8 and October 16-17, 1986 of activities at Point Beach Nuclear Plant and the enforcement conference conducted at the NRC Region III office on September 17, 1986. The inspection report identified two violations and certain perceived programmatic weaknesses in the Point Beach Nuclear Plant radiation protection program.

Our December 5, 1986 letter provided our response to the two violations reported in the inspection report. In addition to the response to violations, we committed to respond to the programmatic weaknesses identified in the inspection report within sixty days of our December 5, 1986 letter.

As we reported in our December 5 response to the two violations, a review committee was formed consisting of the plant health physicist, radiochemist, and corporate health physicist to evaluate the current radiation protection program and to make recommendations in those areas of apparent weakness. Additionally, the Nuclear Power Department has recently hired an additional experienced corporate health physicist, who was able to provide a fresh and independent

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assessment of Point Beach Nuclear Plant activities. He conducted a review and audit of plant health physics activities, as well as the normal practices by Point Beach auxiliary operators. The recommendations of these reviewers will be implemented as appropriate in a time frame commensurate with the identified need and available resources.

Response to Programmatic Weaknesses

The inspection report identifies certain perceived programmatic weaknesses including (a) lack of full-time health physics coverage during off-shift hours, (b) certain activities conducted by health physics qualified auxiliary operators exempt from RWP requirements, and (c) the reuse of protective clothing. Specific actions have been initiated in response to NRC concerns and to Point Beach Nuclear Plant review committee recommendations.

It is currently our objective to maintain the health physics qualification status of auxiliary operators. A contributing factor responsible for the success of the Point Beach Nuclear Plant radiation protection program has been our practice of qualifying auxiliary operators in health physics-related areas. The continued success of the program will be dependent upon auxiliary operators' knowledge and understanding of appropriate health physics practices. We believe the reduction of auxiliary operator personnel qualifications is inappropriate at this time. Due to increased responsibilities and associated increased regulatory requirements, it has become more difficult and more time-consuming for operations personnel to respond to unusual health physics-related tasks. Along with the increases in health physics requirements, a concurrent increase in operation proceduralization and documentation has occurred. Due to this increased work load, operator attention to abnormal or non-routine health physics responsibilities may detract from operating responsibilities or may cause health physics tasks to be performed in a non-optimal manner. To accommodate the current and anticipated increased operator work load and to enhance our radiation protection program to ensure continued success, we intend to implement full-time health physics coverage.

Accordingly, Point Beach is currently evaluating the staffing, recruitment, development, management commitment, and resources which would be required to accommodate continuous on-site health physics coverage. Following completion of this

evaluation, a determination will be made regarding the need and priority of events to be accomplished to achieve continuous health physics coverage. An initial assessment indicates that at least two years will be required to recruit and fully qualify additional health physics personnel necessary to implement continuous on-site health physics coverage.

Point Beach Nuclear Plant is in the process of evaluating Health Physics Procedure 2.5, "Radiation Work Permits". In accordance with Technical Specifications, the procedure permits the accomplishment of certain work activities by health physics qualified personnel without an RWP. HP 2.5 will be reviewed for purposes of redefining, restricting, or eliminating activities which may be performed by health physics qualified personnel without the use of a radiation work permit. Activities currently RWP-exempt will be evaluated to determine whether these activities warrant a specific RWP or standing RWP. We anticipate the adoption and utilization of a standing RWP system to better control the routine activities of auxiliary operators and other health physics qualified personnel.

Standing RWP's for appropriate work activities will be issued and approved by the responsible group head and the health physicist. The standing RWP instructions will provide guidance to the employee directed toward preventing recurrence of events such as noted in the November 5, 1986 inspection report. Limiting conditions will be identified in the standing RWP to prevent the performance of work activities that could involve or result in occurrences of radiological significance. An appropriate revision to HP 2.5 will be implemented by March 31, 1987.

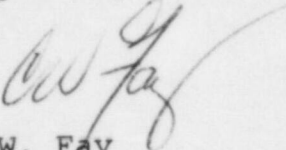
Point Beach Nuclear Plant has implemented changes to the protective clothing reuse policy. A policy memorandum on the use of controlled zone protective clothing was issued on October 13, 1986 to all Point Beach personnel and contractor supervisors. The new policy was also discussed with plant personnel at a plant-wide safety meeting. The policy requires that each person frisk protective coveralls prior to being placed in controlled zone lockers. Friskers have been installed in the exit hallway from the primary auxiliary building to facilitate this frisking requirement. Protective clothing contamination limits have been technically re-evaluated

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and are posted at the frisker location. The policy also identified personnel in certain job classifications who are now required, as a minimum, to discard their protective coveralls at the end of each work shift. These job classifications include employees that are likely to enter contaminated areas during their work shift. A revision to Health Physics Procedure HP 2.7, "General Use of Protective Clothing", to incorporate appropriate policy requirements is in process.

If you have any questions or require additional information regarding our response to these items, please contact me.

Very truly yours,



C. W. Fay
Vice President
Nuclear Power

Copies to Regional Administrator - Region III
Att: Jack A. Hind, Director
Division of Radiation Safety & Safeguards
Resident Inspector