



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

(920) 755-2321

NPL 98-0323

10 CFR 2.201

April 30, 1998

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

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-266/98010(DRS) AND 50-301/98010(DRS)
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter from Mr. John A. Grobe dated April 1, 1998, the Nuclear Regulatory Commission forwarded the results of an inspection conducted by your staff at our Point Beach Nuclear Plant. The inspection was completed on March 18, 1998. The purpose of the inspection was to review the measuring and test equipment (M&TE) procedures and the control of M&TE. The inspection report included a Notice of Violation that identified one violation of NRC requirements.

We have reviewed the Notice of Violation and pursuant to the provisions of 10 CFR 2.201, have prepared a written response to the violation as requested by your letter of April 1, 1998. Our written response to the violation is included as an attachment to this letter.

We believe that the attached reply is responsive to the Notice of Violation and fulfills the requirements identified in your April 1, 1998, letter.

If you have any questions or require additional information regarding this response, please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Scott A. Patulski'.

Scott A. Patulski
Site Vice President
Point Beach Nuclear Plant

Attachment

cc: NRC Regional Administrator
NRC Resident Inspector
NRC Project Manager
PSCW

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REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORTS 50-266/98010(DRS) AND 50-301/98010(DRS)
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

During an NRC inspection completed on March 18, 1998, one violation of NRC requirements was identified. Inspection Reports 50-266/98010(DRS) and 50-301/98010(DRS) and the Notice of Violation (Notice) transmitted to Wisconsin Electric on April 1, 1998, provide details regarding the violation.

In accordance with the instructions provided in the Notice, our reply to the violation includes: (1) the reason for the violation, or if contested, the basis for disputing the violation; (2) the corrective action taken and the results achieved; (3) corrective action to be taken to avoid further violations; and (4) the date when full compliance will be achieved.

Violation 1:

"Title 10 of the Code of Federal Regulations, 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 deviations are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the conditions is determined and corrective action taken to preclude repetition.

Contrary to the above, as of March 13, 1998, the licensee failed to establish measures to assure that conditions adverse to quality were promptly identified and corrected. Specifically the licensee failed to adequately review or analyze the effects on permanent plant equipment for out-of-tolerance, damaged, or lost measuring and test equipment. The following measuring and test equipment was not evaluated: OPSDH-002, OPSDP-001, OPSSW-009, OPSTW-002, MCLC-001 and MCCP-007. In addition, damaged instrument MCMA-003 was evaluated but the evaluation did not consider, in the absence of as-found data, the out-of-tolerance error or the need for retesting of plant equipment tested by the instrument.

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

Response to Violation 1:

Reason for Violation:

We concur this is a violation of NRC requirements as characterized in the inspection report. The violation occurred as a result of a lack of a comprehensive M&TE program at Point Beach Nuclear Plant. As documented in the inspection report, there were three different administrative processes governing M&TE in various plant groups. As further documented, Wisconsin Electric, the licensee, had previously recognized in October, 1997, the three M&TE procedures were not providing adequate guidance and contained conflicting requirements. Process improvements to the M&TE program were in progress at the time of this inspection. These improvements, which included corrective actions resulting from our QA audits and self-assessments, were in progress at the time this inspection was conducted.

Corrective Actions Taken:

Programmatic corrective actions were completed on April 8, 1998, with the issuance of revised administrative procedure NP 8.7.1, "Measuring and Test Equipment," Revision 3. The procedure revision provides a comprehensive process for control of M&TE. Administrative procedures NP 8.7.2, "Calibration and Control of Measuring and Test Equipment (Instrument and Control)," and OM 5.4.9, "Control of Operations Department Measuring and Test Equipment," were also canceled.

In addition to the above programmatic corrective actions, the following specific corrective actions were taken to address the individual instruments identified in the Notice of Violation:

M&TE	Description	Unevaluated Condition	Current Status	Evaluation Results	Condition Report
OPSDH-002	Digital Hygrometer	Lost	Retired	Reviewed CHAMPS use record, none found. No rework.	98-1076
OPSDP-001	Digital Pyrometer	Lost	Retired	Reviewed CHAMPS use record, none found. No rework.	98-1039
OPSSW-009	Stopwatch	Lost	Retired	Reviewed CHAMPS use record, none found. No rework.	98-1077
OPSTW-002	Torque Wrench	Lost	Retired	Reviewed CHAMPS use record, none found. No rework.	98-1078
MCLC-001	Load Cell	Out-of-Calibration	Replaced	Not applicable.	98-1636
MCCP-007	Current Probe	Damaged	Retired	Validated use. No rework.	98-1137
MCMA-003	Multi-Amp SR-90	Damaged in shipment for scheduled calibration.	Repaired	Vendor replaced damaged parts and obtained as-found data within tolerance. No rework.	98-0654

As can be seen from the above table, Condition Reports were initiated for each of the instruments identified in the Notice of Violation. Most of the specific corrective actions identified for resolution of each instrument have been completed. There are two corrective actions outstanding associated with Condition Report 98-1636 remaining to be completed. Completion of these actions is being managed via our Condition Reporting system.

Corrective Action To Be Taken:

There are no corrective actions required to preclude future recurrence of this type of violation.

Date Of Full Compliance:

Full compliance with NRC requirements was achieved on April 8, 1998, when the programmatic changes to our M&TE program were implemented with the revision and issuance of NP 8.7.1.