October 25, 2000

Mr. M. Reddemann
Site Vice President
Kewaunee and Point Beach Nuclear Plants
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

SUBJECT: POINT BEACH NUCLEAR PLANT - NRC INSPECTION REPORT 50-266-00-13(DRP); 50-301-00-13(DRP)

Dear Mr. Reddemann:

On September 30, 2000, the NRC completed a baseline inspection at your Point Beach Nuclear Plant. The results of this inspection were discussed on September 28, with Mr. F. Cayia and other members of your staff. The enclosed report presents the results of that inspection.

This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within those areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, one issue of very low safety significance (no color) was identified. This issue was determined to involve a violation of NRC requirements. However, the violation was not cited due to its very low safety significance and because it has been entered into your corrective action program. If you contest the Non-Cited Violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region III; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Point Beach facility.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available **electronically** for public inspection in the NRC Public Document Room **or** from the *Publicly Available Records System (PARS) component of*

NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

Sincerely,

Original signed by
Roger Lanksbury, Chief

Roger Lanksbury, Chief
Reactor Projects Branch 5

Docket Nos. 50-266; 50-301
License Nos. DPR-24; DPR-27

Enclosure: Inspection Report 50-266-00-13(DRP);
50-301-00-13(DRP)

cc w/encl: R. Grigg, President and Chief
Operating Officer, WEPCo
M. Wadley, Chief Nuclear Officer, NMC
J. Gadzala, Licensing Manager
S. Cartwright, Nuclear Asset Manager
F. Cayia, Plant Manager
J. O'Neill, Jr., Shaw, Pittman,
Potts & Trowbridge
K. Duveneck, Town Chairman
Town of Two Creeks
B. Burks, P.E., Director
Bureau of Field Operations
A. Bie, Chairperson, Wisconsin
Public Service Commission
S. Jenkins, Electric Division
Wisconsin Public Service Commission
State Liaison Officer

DOCUMENT NAME: G:\POIN\POI2000013DRP.wpd

To receive a copy of this document, indicate in the box:"C" = Copy without enclosure "**E**"= Copy with enclosure"**N**"= No copy

OFFICE	RIII		RIII					
NAME	Kunowski		Lanksbury					
DATE	10/ /00		10/ /00					

OFFICIAL RECORD COPY

ADAMS Distribution:
CMC1
DFT
BAW (Project Mgr.)
J. Caldwell, RIII
B. Clayton, RIII
SRI Point Beach
DRP
DRSIII
PLB1
JRK1
BAH3

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos:	50-266; 50-301
License Nos:	DPR-24; DPR-27
Report No:	50-266-00-13(DRP); 50-301-00-13(DRP)
Licensee:	Nuclear Management Company, LLC
Facility:	Point Beach Nuclear Plant, Units 1 & 2
Location:	6610 Nuclear Road Two Rivers, WI 54241
Dates:	August 23 through September 30, 2000
Inspectors:	F. Brown, Senior Resident Inspector R. Powell, Resident Inspector J. Lara, Senior Resident Inspector, Kewaunee Z. Dunham, Resident Inspector, Kewaunee
Approved by:	R. Lanksbury, Chief Reactor Projects Branch 5 Division of Reactor Projects

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety	Radiation Safety	Safeguards
● Initiating Events	● Occupational	● Physical Protection
● Mitigating Systems	● Public	
● Barrier Integrity		
● Emergency Preparedness		

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW, or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.

SUMMARY OF FINDINGS

IR 05000266-00-13, IR 05000301-00-13, on 08/23 - 09/30/2000; Nuclear Management Company, LLC; Point Beach Nuclear Plant; Units 1 & 2; Event Followup.

The inspection was conducted by resident inspectors. The inspectors identified one no color finding. The significance of findings is usually indicated by their color (Green, White, Yellow, Red) and was determined by using Inspection Manual Chapter 0609, "Significance Determination Process," (SDP). Findings for which the SDP does not apply are indicated by "no color" or by the severity level of the applicable violation.

Other

- NO COLOR. A Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified during the review of Licensee Event Report 50-266/2000-005-00, "Termination Criteria for Containment Spray in Emergency Operating Procedure Non-Conservative with Safety Analysis Assumptions." This report described a discrepancy with an Emergency Operating Procedure which had the potential to allow operators to prematurely secure containment spray prior to reaching the analyzed draw down level of the refueling water storage tank. The corrective actions were being tracked in the licensee's corrective action program. (Section 40A3)

Report Details

Summary of Plant Status: The plant was operated at 100 percent power throughout the inspection period except for short periods during routine testing.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, and Emergency Preparedness

1R04 Equipment Alignment

.1 Safety-Related 125-Volt Direct Current (VDC) and 120-Volt Alternating Current (VAC) Partial System Walkdown

a. Inspection Scope

The inspectors performed a partial walkdown of the 125-VDC and 120-VAC safety-related buses. The 125-VDC system had a high risk achievement worth in the licensee's Individual Plant Examination. The following documents were used while performing the system walkdown:

- 0-SOP [Standard Operating Procedure]-Y-001, "120 VAC Vital Instrument Inverters," Revision 0
- 0-SOP-DC-001, "125 VDC System, Bus D-01 & Components," Revision 5
- 1-SOP-Y-Y01, "1Y-01, Red 120 VAC Vital Instrument Panel," Revision 0
- 2-SOP-Y-Y06, "2Y-06, 120 VAC Vital Instrument Panel," Revision 0
- 2-SOP-Y-Y01, "2Y-01, Red 120 VAC Vital Instrument Panel," Revision 0
- Condition Report (CR) 98-3770, "Discrepancies Between Drawings and Field Installation"
- CR 99-1518, "Incorrect 120 VAC Instrument Panel Drawing"

The inspectors verified correct breaker and switch position as specified by system procedures. The inspectors also verified proper labeling, tagging, and marking of the observed components. Finally, the inspectors verified that housekeeping practices in the vicinity of electrical equipment were consistent with seismic safety standards.

The following CR was initiated as a result of this inspection activity, and was reviewed as part of the inspection scope:

- CR 00-2572, "Incorrect Control Room 125 VDC Mimic"

b. Issues and Findings

There were no findings identified during the inspection.

.2 Unit 1 Auxiliary Feedwater (AFW) Complete System Walkdown

a. Inspection Scope

The inspectors performed a complete walkdown of accessible portions of the Unit 1 AFW system to verify system operability. The AFW system was selected due to its high risk significance. The inspectors used the following documents to accomplish the inspection:

- Checklist (CL) 13E Part 1, "Auxiliary Feedwater Valve Lineup Turbine-Driven Unit 1," Revision 13
- CL 13E Part 2, "Auxiliary Feedwater Valve Lineup Motor Driven," Revision 32

The inspectors verified the correct position of valves in the AFW system using the system diagrams and CLs and verified breaker alignments using the system CLs. The inspectors also observed instrumentation valve configurations and whether appropriate meter indications existed. Control room switch positions were also verified by the inspectors. Finally, the inspectors evaluated other elements, such as material condition, housekeeping, and component labeling.

b. Issues and Findings

There were no findings identified during the inspection.

1R05 Fire Protection

a. Inspection Scope

The inspectors walked down the following risk significant areas looking for any fire protection degradations:

- G-03 Diesel Room, Fire Zone 770
- G-03 Switchgear Room, Fire Zone 773
- G-04 Diesel Room, Fire Zone 775

Emphasis was placed on the control of transient combustibles and ignition sources, the material condition of fire protection equipment, and the material condition and operational status of fire barriers used to prevent fire damage or propagation. Area conditions/configurations were evaluated based on information provided in the licensee's "Fire Protection Evaluation Report," dated August 1999.

The inspectors verified that fire hoses and portable fire extinguishers were installed at their designated locations, were in satisfactory physical condition, and were unobstructed. The inspectors verified the physical location and condition of fire detection devices. Additionally, passive features, such as fire doors, fire dampers, and mechanical and electrical penetration seals, were verified to be located per Fire Protection Evaluation Report requirements and to be in good physical condition.

The inspectors reviewed the following documents to verify that the licensee had conducted inspections of fire barrier penetration seals in accordance with Fire Protection Evaluation Report requirements:

- Routine Maintenance Procedure (RMP) 57, "Fire Barrier Penetration Fire Seal Surveillance," Revision 8

- Work Order (WO) 9911337, "Fire Barrier Inspection"

b. Issues and Findings

There were no findings identified during the inspection.

1R07 Heat Sink Performance

a. Inspection Scope

The inspectors reviewed the licensee's program for chemical treatment of the service water system to control zebra mussels and monitoring of plant equipment to ensure system operability. The inspectors accompanied the responsible system engineer during the chemical injection conducted during the week of September 25, 2000, reviewed the acceptance criteria, and verified that system performance test results met the required criteria. The following documents were reviewed:

- Operating Instruction 70, "Service Water System Operation," Revision 28
- Operating Instruction 155, "Chemical Treatment of Service Water For Zebra Mussels," Revision 5
- Historical system performance monitoring logs and inspection results for Emergency Diesel Generator (EDG) G01
- Containment fan coil unit tube blocking contingency plans

b. Issues and Findings

There were no findings identified during the inspection.

1R11 Licensed Operator Requalification

a. Inspection Scope

The inspectors observed licensed operator requalification examinations conducted September 12, 2000. The inspectors reviewed crew performance in terms of clarity and formality of communication; the ability to take timely, safe action; the prioritizing,

interpreting, and verifying of alarms; the correct use and implementation of procedures, including alarm response procedures; timely control board operation and manipulation, including high-risk operator actions; identification and implementation of appropriate technical specification (TS) actions such as reporting and emergency plan actions and notifications; and overall group dynamics. The inspectors also verified that the licensee's evaluators identified and documented crew performance issues. Finally, the inspectors verified that individuals who failed the examination received a temporary watch-standing restriction until they were remediated.

b. Issues and Findings

There were no findings identified during the inspection.

1R12 Maintenance Rule Implementation

.1 High Vibration on G-02 EDG

a. Inspection Scope

The inspectors assessed the effectiveness of the licensee's implementation of maintenance rule requirements on the G-02 EDG. The inspectors specifically reviewed performance problems associated with severe degradation of bearings in the G-01 EDG. The inspectors verified that the EDG maintenance rule classification was consistent with the "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," NUMARC [Nuclear Management and Resources Council] 93-01, that performance problems were documented in the licensee's corrective action program, and that corrective actions were being established.

b. Issues and Findings

There were no findings identified during the inspection.

.2 Voltage Regulator Problems with G-04 EDG

a. Inspection Scope

The inspectors assessed the effectiveness of the licensee's implementation of maintenance rule requirements on G-04. The inspectors reviewed the following documents:

- CR 00-1794, "G-04 Voltage Regulator Problem"
- CR 99-2300, "Erratic Diesel Generator Operation During Monthly Test"
- CR 99-0127, "G-04 Reverse Power During Test"
- CR 96-143, "Potential Substandard EDG Voltage Regulator - 10 CFR Part 21 Issue"

- WO 9817885, “G-04 Voltage Regulator Making Loud Noise”

The inspectors reviewed an equipment problem (periodic failure of voltage regulation) experienced by G-04. The inspectors assessed the licensee’s maintenance rule evaluations for Functional Failures and Maintenance Preventable Functional Failures. The inspectors verified that the G-04 maintenance rule classification was consistent with NUMARC 93-01, “Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants,” that the equipment problem was documented in the licensee’s corrective action program, and that corrective actions were being established.

b. Issues and Findings

There were no findings identified during the inspection.

1R13 Maintenance Risk Assessment and Emergent Work Evaluation

.1 Plant Risk Profile with an EDG Paralleled to the Grid

a. Inspection Scope

The inspectors reviewed the licensee’s risk evaluations associated with testing of the EDGs. Specifically, the inspectors performed an evaluation of the licensee’s treatment of the availability of EDGs during a loaded test, paralleled to the grid. The inspectors discussed this issue with licensee personnel and reviewed the following documents:

- Nuclear Power Business Unit Procedure (NP) 10.2.2, “Scheduling, Planning, and Implementing On-Line Work,” Revision 4
- NP 10.3.7, “On-Line Safety Assessment,” Revision 2
- RMP 9043, “G-04 Maintenance,” various revisions

The following CR was initiated as a result of this inspection activity and was reviewed as part of the inspection scope:

- CR 00-2740, “Error in Safety Monitor Modeling of Loaded EDGs”

b. Issues and Findings

There were no findings identified during the inspection.

.2 Licensee Evaluation of Cumulative Maintenance Risk on August 25, 2000

a. Inspection Scope

The inspectors reviewed the licensee’s planning for maintenance work scheduled for August 25, 2000. The licensee had determined that the planned work activities on this day had a cumulative effect of being risk significant. The work being performed affected diverse plant equipment. Specifically, it affected the G-05 station gas turbine generator

and the rod control system for each unit. The inspectors discussed the maintenance work with plant staff, and reviewed the output of the licensee's safety monitor to ensure that the causes of the reported risk were understood. The inspectors also performed an assessment of the licensee's maintenance scheduling and management for the reviewed activities to verify that risk was "minimized" during the planning and performance of work.

b. Issues and Findings

There were no findings identified during the inspection.

.3 Licensee Management of Risk During AFW Motor-Driven Pump P-38B Planned Maintenance

a. Inspection Scope

The inspectors reviewed the licensee planning, scheduling, and conduct of P-38B planned maintenance to verify unnecessary risk was avoided. Additionally, the inspectors verified that the licensee used a risk monitoring tool ("safety monitor" software) in the planning and scheduling process and that emergent work was assessed for risk impacts. The inspectors selected the activity for detailed review due to the elevated risk configuration when P-38B was out-of-service.

b. Issues and Findings

There were no findings identified during the inspection.

1R14 Personnel Performance During Non-routine Plant Evolutions

a. Inspection Scope

The inspectors reviewed plant data and interviewed operators to evaluate the performance and response to a series of unanticipated fluctuations in the throttle position of a Unit 1 steam generator feed regulating valve. The inspectors compared the primary temperatures and pressures during the subject transients to normal system values. The inspectors evaluated the rapidity of the operators' response to the valve fluctuations, and the actual reactor thermal power relative to the license limits.

b. Issues and Findings

There were no findings identified during the inspection.

1R15 Operability Evaluations

.1 Operability Determination (OD) Associated With CR 00-2544, "Refueling Water Storage Tank (RWST) Immersion Heaters"

a. Inspection Scope

The inspectors reviewed the technical adequacy of the OD to ensure that operability was properly justified. The OD addressed the operability of the RWST immersion heaters. Condition Report 00-2544 documented that heater contacts were rated for 70 amperes while "fully operational" heaters were specified to draw 72 amperes. Condition Report 99-2654 previously documented that the immersion heaters draw less current than the manufacturer specification. Based on the degraded condition of the heaters, the licensee concluded that the 70-ampere rated contacts were sufficient and that the heaters were capable of preventing the RWSTs from freezing. The inspectors verified that issue was entered into the licensee's corrective action program and that the heaters were scheduled for replacement.

b. Issues and Findings

There were no findings identified during the inspection.

.2 OD Associated With CR 00-2647, "Post-Maintenance Testing of Vacuum Breakers Incomplete"

a. Inspection Scope

The inspectors reviewed the technical adequacy of the OD to ensure that operability was properly justified. The OD addressed the failure to perform complete post-maintenance testing of vacuum breakers installed during the previous Unit 2 refueling outage. Specifically, testing of an installed breaker auxiliary contact wired in series with a lockout relay had not been performed. The auxiliary contact was required to be closed for the lockout relay to function. The licensee identified that without testing, it could not be assumed that the auxiliary contact was closing when the breaker was closed. Included in the group of breakers which was not tested was the supply breaker, 2A52-49, from bus 2A-04 to safety-related bus 2A-06. The licensee concluded that the breakers were operable based on engineering judgement and past experience. Specifically, the OD stated that all other contacts on the breakers were successfully tested after breaker installation and that 42 other breakers had been installed with complete post-maintenance testing of all auxiliary contacts without any failures. Additionally, the OD stated that in the event the 2A52-49 breaker failed to open on overcurrent, an upstream supply breaker would open to perform the overcurrent protective function. The inspectors verified that the issue was entered into the licensee's corrective action program and that the breakers were scheduled for testing.

b. Issues and Findings

There were no findings identified during the inspection.

1R16 Operator Work-Arounds (OWA)

.1 Periodic Review

a. Inspection Scope

The inspectors reviewed degraded plant conditions to determine the potential to affect operator response to emergency plant events. The conditions were reviewed to determine whether such an effect was probable, and if so, whether the licensee had entered the condition into the corrective action program and had initiated appropriately compensatory actions.

- Tag-out 0Y1Y-6-18, "Circuit Abandoned in Place," Revision 0-1
- RMP 9372, "DC [Direct Current] Ground Locating," Revision 0
- WO 9931369, "D-07 Ground Indication"

b. Issues and Findings

There were no findings identified during the inspection.

.2 OWA Cumulative Review

a. Inspection Scope

The inspectors conducted a semi-annual review of open OWAs to evaluate the cumulative effects of OWAs on safety system availability and reliability, identify any cumulative effects which could increase an initiating event frequency or affect multiple mitigating systems, and review the cumulative effects of OWAs on the ability of operators to respond in a correct and prompt manner to plant transients and accidents. The inspectors also evaluated whether there were OWAs which had not been identified by the licensee. The OWAs that were evaluated for cumulative effects were 0-94C-001, 0-97R-005, 0-98R-013, 0-99C-001, 0-99C-002, 1-97R-004, and 0-00C-001.

b. Issues and Findings

There were no findings identified during the inspection.

1R17 Permanent Plant Modifications

a. Inspection Scope

The inspectors reviewed a permanent plant modification that was being installed over an extended period of time. The modification affected the 125-VDC distribution system. Documents reviewed included the following:

- Plant Modification 97-014*E, "Unit 1/Unit 2 125-VDC Upgrade, Part 5 of 7"

- Installation Work Plan (IWP) 97-014*E-1, “Transfer Power Supply for 1DY-01 to D-11"
- IWP 97-014*E-2, “Transfer Power Supply for 2DY-02 to D-13"
- IWP 97-014*E-3, “Install Panel D-26 and Transfer Loads to D-26"
- Abnormal Operating Procedure 10A, “Safe Shutdown - Local Control,” Revision 28

The inspectors compared the modification work to the 125 VDC design and licensing requirements, specifically the Final Safety Analysis Report (FSAR) system and functional description. The inspectors verified that the modification package contained a safety evaluation, and that the IWPs conformed to the safety evaluation. The inspectors reviewed the system procedures to verify that the modification was appropriately reflected in the procedures.

The following CR was initiated as a result of this inspection activity, and was reviewed as part of the inspection scope:

- CR 00-2766, “Failure to Update Abnormal Operating Procedure 10A”

b. Issues and Findings

There were no findings identified during the inspection.

1R19 Post-Maintenance Testing

.1 Emergency Diesel Generator G-01 Testing

a. Inspection Scope

The inspectors reviewed and observed post-maintenance testing activities involving EDG G-01 return-to-service. The following procedures were reviewed:

- RMP 9043-17, “Emergency Diesel G-01 Maintenance Run and Post Maintenance Testing,” Revision 2, Temporary Change 2000-0413
- RMP 9043-1, “Emergency Diesel Generator G-01 Train A Preventive Maintenance,” Revision 3, Temporary Change 2000-0400

The inspectors reviewed the test procedures for appropriateness, observed all or significant parts of the performance of the test, and verified that work practices and procedure adherence were consistent with regulatory requirements and standards. The inspectors also verified that the impact of the testing had been properly characterized during the pre-job briefing, that all testing prerequisites were satisfied, and that test data was complete and appropriately verified.

b. Issues and Findings

There were no findings identified during the inspection.

.2 Charging Pump 2P-2A Seal Replacement

a. Inspection Scope

The inspectors reviewed and observed post-maintenance testing activities involving charging pump 2P-2A return-to-service: The following procedures were reviewed:

- RMP 9003-2, “Charging Pump Seal Replacement,” Revision 10
- Inservice Test 22, “Charging Pumps and Valves Test (Quarterly) Unit 2,” Revision 9

During post-maintenance testing observations, the inspectors verified that the test was adequate for the scope of maintenance work which had been performed and that the testing acceptance criteria was clear and demonstrated operational readiness consistent with design and licensing basis documents. The inspectors verified that all testing prerequisites were met, the test was performed as written, and the test data were complete, appropriately verified, and met the requirements of the testing procedure.

b. Issues and Findings

There were no findings identified during the inspection.

.3 Condenser Steam Dump Valve Controls Upgrade

a. Inspection Scope

The inspectors reviewed post-maintenance testing activities following completion of condenser steam dump valve controls modification to ensure that the testing was adequate for the scope of maintenance work which had been performed and that the testing acceptance criteria was clear and demonstrated operational readiness consistent with design and licensing basis documents. Specifically, the inspectors reviewed the following documents:

- Point Beach FSAR, Section 7.7.2, “Condenser Steam Dump Control,” dated June 2000
- Point Beach FSAR, Section 10.1, ”Steam and Power Conversion System,” dated June 2000
- WO 9926101, “Main Steam Dump to Condenser Dump Control”
- IWP 00-020-02, “Condenser Steam Dump Valve Positioner Control Scheme Upgrade”

- Periodic Check 11, Part 3, “Condenser Steam Dump Valve Test Data (Quarterly)”

b. Issues and Findings

There were no findings identified during the inspection.

.4 Motor-Driven AFW Pump P-38B

a. Inspection Scope

The inspectors reviewed and observed the post-maintenance testing activities performed in accordance with Inservice Test 10, “Test of Electrically-Driven Auxiliary Feed Pumps and Valves (Quarterly),” Revision 39, following planned P-38B maintenance. The inspectors reviewed the test procedure for appropriateness, observed all or significant parts of the performance of the test, and verified that work practices and procedure adherence were consistent with regulatory requirements and standards. The inspectors also verified that the impact of the testing had been properly characterized during the pre-job briefing; that all testing prerequisites were satisfied; and that test data were complete and appropriately verified.

b. Issues and Findings

There were no findings identified during the inspection.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors reviewed and observed the monthly surveillance testing of EDG G-04 to ensure that testing met the design basis and licensing basis commitments, that testing demonstrated the equipment was capable of performing its design basis function, and that the acceptance criteria were met. Specifically, the inspectors reviewed the following documents:

- Design Basis Document 16, “Emergency Diesel Generator System,” Revision 0
- Point Beach FSAR, Chapter 8.8, “Diesel Generator System,” dated June 2000
- TS Test 84, “Emergency Diesel Generator G-04 Monthly,” Revision 10
- CL 11A G-04, “G-04 Diesel Generator Checklist,” Revision 5
- Point Beach Form 2067D, “G-04 Emergency Diesel Generator Logsheet,” Revision 8
- Periodic Check 12 Part 7, “Diesel Generator Vibrations (Quarterly) G-04,” Revision 1

The inspectors observed significant parts of the performance of TS Test 84 on September 3, 2000, and verified that work practices and procedure adherence were consistent with regulatory requirements and standards. The inspectors also verified that all testing prerequisites were satisfied and that test data were complete and appropriately verified. Following completion of the test, the inspectors verified that the equipment was returned to a condition in which it could perform its safety-related function.

b. Issues and Findings

There were no findings identified during the inspection.

1R23 Temporary Plant Modifications

a. Inspection Scope

The inspectors reviewed Temporary Modification (TM) 99-053 which installed two isolation valves to allow for an alternate source of instrument air (IA) to the Unit 1 spray additive tank eductor valves 1SI-00836A and 1SI-00836B valve operators. The alternate source of IA was needed in order to repair an air leak on the upstream side of the normal IA isolation valve, IA-01717, to 1SI-00836A. Specifically, the inspectors reviewed the following documents:

- NP 7.3.1, “Temporary Modifications,” Revision 11
- TM 99-053, “Temporary IA Isolation Valves”
- WO 9918436, “Perform Installation Portion of TM 99-053 during U1R25"
- 10 CFR 50.59 Screen SCR 1999-1283, “TM 99-53, Install Two Whitey Valves on Air Supply Lines to 1SI-00836A&B”
- Point Beach FSAR, Chapter 9.7, “IA/Service Air,” dated June 2000
- Point Beach FSAR, Chapter 6.4, “Containment Spray System,” dated June 2000

The inspectors reviewed safety screen SCR 1999-1283 against system design basis documentation; verified that the TM was installed in accordance with WO 9918436; and verified that post-installation testing was adequate to confirm that there was no unintended impact on the plant.

b. Issues and Findings

There were no findings identified during the inspection.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspectors reviewed the Unplanned Power Changes per 7000 Critical Hours PI for the second quarter of 2000 for Unit 1 and Unit 2. The inspectors used the PI definition and guidance contained in Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0. The inspectors reviewed station logs and licensee monthly Operating Data Reports to determine the number of unplanned power changes and number of critical hours during the previous four quarters. The inspectors verified PI values by independent calculation.

b. Issues and Findings

There were no findings identified during the inspection.

4OA3 Event Follow-up

(Closed) Licensee Event Report (LER) 50-266/2000-005-00: Termination Criteria for Containment Spray in Emergency Operating Procedure (EOP) Non-Conservative with Safety Analysis Assumptions. This LER described a licensee-identified discrepancy with EOP 1.3, "Transfer to Containment Sump Recirculation," Revision 20, which had the potential to allow operators to prematurely secure containment spray prior to reaching the analyzed draw down level of the RWST. Prematurely securing containment spray under the termination criteria identified in EOP 1.3, Revision 20, created the potential for increased dose consequences offsite and in the control room due to inadequate iodine removal from containment atmosphere. The licensee's evaluation subsequently identified an inadequate 10 CFR 50.59 screening of EOP 1.3, Revision 20, as the root cause of the event.

The inspectors performed a risk significance screening of the inadequate emergency operating procedure for securing the containment spray system in accordance with NRC Inspection Manual Chapter 0609, "Significance Determination Process." Because the procedure deficiency did not affect the actual operability, availability, or reliability of the containment spray system, the issue was not evaluated using the Significance Determination Process. The inspectors determined that extenuating circumstances existed since this finding was identified during a review of a licensee LER. This findings constituted a "no color" finding.

Criterion V, "Instructions, Procedures, and Drawings," of 10 CFR Part 50, Appendix B, required that activities affecting quality be prescribed by instructions appropriate to the circumstances. Licensee Procedure EOP 1.3 was not appropriate to the circumstances in that termination criteria would have allowed securing containment spray before enough spray volume would be released into the containment atmosphere, if the EOP had been used during an actual emergency. This violation of Criterion V is being treated as a Non-Cited Violation (NCV) (NCV 50-266-00-13-01(DRP);

50-301-00-13-01(DRP)) consistent with Section VI.A.1 of the NRC Enforcement Policy. The LER documented the licensee's corrective actions. The corrective actions were being tracked in the licensee's corrective action program.

4OA5 Other

.1 Temporary Instruction 2515/144, PI Data Collecting and Reporting Process Review

a. Inspection Scope

The inspectors reviewed the licensee's PI indicator data collecting and reporting process to determine whether the licensee was properly implementing NRC endorsed guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0. Specifically, the inspectors reviewed indicator definitions, data reporting elements, calculational methods, definition of terms, and use of clarifying notes identified in licensee Procedure NP 5.2.16, "NRC Performance Indicators," Revision 0. Additionally, the inspectors interviewed members of the licensee staff responsible for data acquisition, verification, and reporting.

b. Findings

The inspectors identified that the following weaknesses, with the licensee's PI data collecting and reporting process, could affect accurate reporting:

- The inspectors identified that the term "fault exposure hours" for safety system unavailability was undefined and that, more significantly, no methodology for calculating fault exposure hours was provided in NP 5.2.16.

- The inspectors identified that NP 5.2.16 specifically allowed submission of safety system unavailability data to the NRC without independent verification.

- The inspectors identified that the licensee's application of the testing exemption for safety system unavailability was not consistent with NEI 99-02 guidance. The licensee interpretation was included as a clarifying note in Attachment B of NP 5.2.16. NEI 99-02 stated that testing was considered planned unavailable hours "unless the test configuration is automatically overridden by a valid starting signal, or the function can be restored either by an operator in the control room or a dedicated operator stationed locally for that purpose." NEI 99-02 further stated "restoration actions must be contained in a written procedure, must be uncomplicated (a single action or a few simple actions), and must not require diagnosis or repair." The licensee had interpreted this guidance to allow exemption of test procedures which "direct the control room to place a pump in "pull-out" and then direct several simple valve manipulations by one operator in the field, followed by operation of the system by the control room." The inspectors concluded that "several" valve manipulations were not consistent with NEI 99-02 guidance and that the coordinated activity described in NP 5.2.16 did not meet the "virtual certainty" of success requirement called for by the NEI 99-02 guidance.

4OA6 Meetings, including Exit

On September 28, 2000, the inspectors presented the inspection results to Mr. F. Cayia, Plant Manager, and other members of licensee management. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

M. E. Reddemann, Site Vice President
A. J. Cayia, Plant Manager
B. J. O'Grady, Operations Manager
V. M. Kaminskas, Maintenance Manager
R. P. Farrell, Radiation Protection Manager
J. Gadzala, Licensing Manager
R. G. Mende, Director of Engineering
D. D. Schoon, System Engineering Manager

NRC

B. A. Wetzel, Point Beach Project Manager, NRR

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-266-00-13-01 50-301-00-13-01	NCV	Inadequate Emergency Operating Procedure For Terminating Containment Spray (Section 4OA3)

Closed

50-266/2000-005-00	LER	Termination Criteria for Containment Spray in Emergency Operating Procedure Non-Conservative With Safety Analysis Assumptions (Section 4OA3)
50-266-00-13-01 50-301-00-13-01	NCV	Inadequate Emergency Operating Procedure For Terminating Containment Spray (Section 4OA3)

Discussed

None

LIST OF ACRONYMS USED

AFW	Auxiliary Feedwater
CFR	Code of Federal Regulations
CL	Checklist
CR	Condition Report
DRP	Division of Reactor Projects
EDG	Emergency Diesel Generator
EOP	Emergency Operating Procedure
FSAR	Final Safety Analysis Report
IA	Instrument Air
IWP	Installation Work Plan
LER	Licensee Event Report
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NUMARC	Nuclear Management and Resources Council
NP	Nuclear Power Business Unit Procedure
NRC	Nuclear Regulatory Commission
OD	Operability Determination
OWA	Operator Workaround
PI	Performance Indicator
RMP	Routine Maintenance Procedure
RWST	Refueling Water Storage Tank
SOP	Standard Operating Procedure
TM	Temporary Modification
TS	Technical Specification
VAC	Volt Alternating Current
VDC	Volt Direct Current
WO	Work Order