

November 8, 2004

CAL 3-04-001

Mr. Dennis L. Koehl  
Site Vice-President  
Point Beach Nuclear Plant  
Nuclear Management Company, LLC  
6590 Nuclear Road  
Two Rivers, WI 54241-9516

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2  
NRC SPECIAL EMERGENCY PREPAREDNESS INSPECTION  
REPORT 05000266/2004007(DRS); 05000301/2004007(DRS)

Dear Mr. Koehl:

On September 24, 2004, the U.S. Nuclear Regulatory Commission (NRC) completed a special inspection at your Point Beach Nuclear Plant, Units 1 and 2. The primary purpose of the inspection was to review your progress in meeting the emergency preparedness commitments documented in the Confirmatory Action Letter, dated April 21, 2004, as well as other emergency preparedness program upgrade activities summarized in Revision 4 of your Excellence Plan, dated August 12, 2004. Due to the fact that you currently share some offsite Emergency Preparedness facilities with the Kewaunee Nuclear Power Plant, the inspection's secondary purpose was to assess your emergency preparedness staff's actions resulting from the potential sale of the Kewaunee Nuclear Power Plant and to determine whether these added tasks adversely impacted their efforts associated with relevant aspects of your Excellence Plan. The enclosed report documents the inspection findings which were discussed with Mr. J. Shaw and members of your staff on September 24, 2004.

The inspection examined activities conducted under your license as they relate to safety and to compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings or violations of NRC requirements were identified. Some steps of all six of the Excellence Plan's Action Plans associated with your emergency preparedness program were reviewed during this inspection. The inspectors did require more information to adequately assess and understand the actions that you have taken for two of the Action Plans reviewed. This indicated the need for continued diligence on the part of your managerial staff in ensuring that closure packages contain all necessary information to demonstrate that you had fully completed and documented all necessary actions. Subsequent to the identification of the closure package completeness concern, your staff adequately provided the needed supplemental information.

Based on the results of this inspection, we noted that progress has been made in the Excellence Plan Action Plans for Emergency Preparedness. Although clear progress has been made with respect to improvements in the site Emergency Response Organization; problems with the Emergency Action Level scheme change request, to date, precludes us from being able to definitively state similar progress has been made with respect to that particular Action Plan. Two major milestones exist to determine the continued improvement progress in EP, those being: (1) successfully supporting NRC review of your corrected EAL package (submitted on October 15<sup>th</sup>), and your subsequent implementation of the revised EAL scheme; and (2) successful ERO performance during the December 7, 2004, EP exercise.

The Action Plan steps reviewed during this inspection were parts of larger Action Plans that typically had overall completion dates in 2005. Additional special follow-up inspections on the six emergency preparedness Actions Plans are planned in 2005.

The inspectors also reviewed your staff's activities resulting from the potential sale of the Kewaunee Nuclear Power Plant in order to determine whether the resulting additional activities adversely impacted efforts to complete steps associated with the six Action Plans relevant to your emergency preparedness program. No significant adverse impacts were identified to date. Since your staff's activities resulting from the potential sale of the Kewaunee Plant are ongoing, further inspections of these activities are also planned in 2005.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and any response you submit 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/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

*/RA/*

Steven A. Reynolds, Acting Director  
Division of Reactor Projects

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

Enclosure: Inspection Report 05000266/2004007(DRS); 05000301/2004007(DRS)  
w/Attachment: Supplemental Information

See Attached Distribution

cc w/encl: F. Kuester, President and Chief  
Executive Officer, We Generation  
J. Cowan, Executive Vice President  
Chief Nuclear Officer  
D. Cooper, Senior Vice President, Group Operations  
J. McCarthy, Site Director of Operations  
D. Weaver, Nuclear Asset Manager  
Plant Manager  
Regulatory Affairs Manager  
Training Manager  
Site Assessment Manager  
Site Engineering Director  
Emergency Planning Manager  
J. Rogoff, Vice President, Counsel & Secretary  
K. Duveneck, Town Chairman  
Town of Two Creeks  
Chairperson  
Public Service Commission of Wisconsin  
J. Kitsembel, Electric Division  
Public Service Commission of Wisconsin  
State Liaison Officer  
W. King, FEMA, Region V

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Steven A. Reynolds, Acting Director  
Division of Reactor Projects

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w/Attachment: Supplemental Information

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cc w/encl: F. Kuester, President and Chief  
Executive Officer, We Generation  
J. Cowan, Executive Vice President  
Chief Nuclear Officer  
D. Cooper, Senior Vice President, Group Operations  
J. McCarthy, Site Director of Operations  
D. Weaver, Nuclear Asset Manager  
Plant Manager  
Regulatory Affairs Manager  
Training Manager  
Site Assessment Manager  
Site Engineering Director  
Emergency Planning Manager  
J. Rogoff, Vice President, Counsel & Secretary  
K. Duveneck, Town Chairman  
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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

Report No: 05000266/2004007(DRS); 05000301/2004007(DRS)

Licensee: Nuclear Management Company, LLC

Facility: Point Beach Nuclear Plant, Units 1 and 2

Location: 6610 Nuclear Road  
Two Rivers, WI 54241

Dates: August 2 through August 6, 2004; and  
September 20 through September 24, 2004

Inspectors: T. Ploski, Senior Emergency Preparedness Inspector  
R. Jickling, Emergency Preparedness Inspector  
R. Kahler, Emergency Preparedness Team Leader  
N. Sanfilippo, Emergency Preparedness Specialist

Approved by: K. Riemer, Chief  
Plant Support Branch  
Division of Reactor Safety

Enclosure

## SUMMARY OF FINDINGS

IR 05000266/2004007(DRS), 05000301/2004007(DRS); 08/02/2004-09/24/2004; Point Beach Nuclear Plant, Units 1 & 2; Emergency Preparedness Special Inspection, Confirmatory Action Letter Follow-up.

This report covers a special inspection conducted by two regional Emergency Preparedness (EP) inspectors on August 2 through 6, 2004, who were augmented by two NRC Headquarters EP specialists on September 20 through 24, 2004. The inspection's primary purpose was to review the licensee's progress in meeting EP commitments documented in Confirmatory Action Letter (CAL) 3-04-001, dated April 21, 2004, and other planned EP program upgrades that were described in Revision 4 of the licensee's Excellence Plan, dated August 12, 2004. No findings were identified. Due to the fact that you currently share some offsite Emergency Preparedness facilities with the Kewaunee Nuclear Power Plant, the inspection's secondary purpose was to assess licensee staff's actions resulting from the potential sale of the Kewaunee Nuclear Power Plant and to determine whether these added tasks adversely affected the licensee's efforts on the six EP program-related Action Plans of the Excellence Plan. No significant adverse impacts were identified.

The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in Nuclear Regulatory Guide (NUREG) 1649, "Reactor Oversight Process," Revision 3, dated July 2000.

**A. Inspector-Identified and Self-Revealing Findings**

None.

**B. Licensee-Identified Findings**

None.

## REPORT DETAILS

In the first quarter of 2003, Point Beach Nuclear Plant entered the Multiple/Repetitive Degraded Cornerstone Column (Column IV) of the Action Matrix of NRC Inspection Manual Chapter 0305, "Operating Reactor Assessment Program," as a result of a high safety significance (Red) inspection finding. The finding involved the potential for a common mode failure of the auxiliary feedwater system following a loss of the instrument air system. This issue was initially identified in November 2001. A second Red inspection finding (Yellow for Unit 1 and Red for Unit 2) was subsequently identified which involved the potential common mode failure of that system's pumps due to plugging of the recirculation line pressure reduction orifices. This issue was initially identified in October 2002. From July 28 to December 16, 2003, the NRC conducted a three-phase supplemental inspection to review the corrective actions for the two auxiliary feedwater system issues, in accordance with NRC Inspection Procedure (IP) 95003, "Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input." The results of this inspection were documented in Inspection Report 05000266/2003007; 05000301/2003007, dated February 4, 2004. On March 17, 2004, a \$60,000 civil penalty was issued for a problem identified during the IP 95003 inspection regarding unauthorized changes to the Emergency Action Level (EAL) scheme in the Point Beach Emergency Response Plan.

On April 21, 2004, Confirmatory Action Letter (CAL) 3-04-001 was issued documenting commitments made by Nuclear Management Company, LLC (NMC) in a March 22, 2004, letter to address areas of regulatory concern identified during the IP 95003 inspection. The basis for these commitments is the NMC Point Beach Excellence Plan, an improvement plan intended to focus the Point Beach organization, site programs, and initiatives on not only the performance issues identified during the IP 95003 inspection but on issues identified through internal assessments and on areas for meeting NMC's goal of excellent performance at Point Beach. Revision 4 of the Excellence Plan became effective on August 12, 2004. The Excellence Plan was composed of Action Plans to address improvement areas. Each Action Plan was composed of action steps with corresponding due dates. A subset of the Excellence Plan's action steps were part of the NMC's commitment letter dated March 22, 2004.

The purpose of this special Emergency Preparedness (EP) inspection was to conduct an initial review of the licensee's progress in implementing its CAL commitments and other Excellence Plan action steps relevant to the Point Beach Plant's EP program. The inspection consisted of interviews with personnel, attendance at meetings, as well as reviews of procedures, Action Plan steps' closure packages, and other licensee records.

Two Region III Office EP inspectors were onsite on August 2 through 6 and September 20 through 24, 2004. These inspectors were augmented by two EP specialists from NRC Headquarters on the latter week. A summary of the results of the inspection is provided below.

### **1. Review of Select Steps of the Excellence Plan's Six EP Action Plans**

The inspectors focused on those steps of the Excellence Plan's Action Plans OP-09-001 through OP-09-006 that the licensee considered to be completed. As indicated in several of the following subsections of this inspection report, the inspectors could not finish assessing all steps that the licensee considered to be complete.



i. **Action Plan OP-09-001: Improve EP Infrastructure (Processes, Programs, and Technology)**

a. Scope

The licensee considered Steps 1, 2, 3, 5 through 10, and 13 through 18 of this Action Plan to be complete. The inspectors reviewed and discussed Steps 1, 2, 3, 5, 8, 14, and 15 of this Action Plan. Step 1 consisted of forming an EP Advisory Committee (EPAC) to include membership of senior site management and providing an approved EPAC charter. Step 2 consisted of forming an EP Training Advisory Committee (TAC) to include members of the plant's Emergency Response Organization (ERO). Step 3 consisted of the development and communication of an EP vision and mission statement for the site. Step 5 consisted of implementation of a structured approach to ERO staffing by transitioning to rotating ERO duty roster teams for key positions. Step 8 consisted of improving the implementation of the Corrective Action Program (CAP) by training the EP staff. Steps 14 and 15 were redundant and consisted of conducting an effectiveness review of EP staff's knowledge, roles, responsibilities, and use of the CAP.

Step 4, which was to clarify minimum staffing requirements for emergency response, had a due date of March 28, 2005. Step 11, which was to develop procedures, guidelines, or job aids that formalize the processes for EP staff members' responsibilities, had a due date of December 15, 2004. Step 12, which was to implement cross training of EP staff members based on the procedures, guidelines, and job aids to strengthen EP staff members' overall knowledge of EP, had a due date of March 15, 2005. Step 15A, which was intended to facilitate independent and regulatory reviews, had a due date of February 28, 2005.

b. Implementation of Action Plan Steps

The inspectors reviewed and discussed the current EPAC charter and draft changes to the charter that were in progress. The charter provided adequate guidance on the EPAC's scope, purpose, membership, responsibilities, conduct of meetings, and standard meeting topics. These items were broken down into specifics that adequately clarified each item and also addressed the following matters: providing leadership and support for EP program activities; monitoring the EP staff's working relationships with external agencies; frequency of EPAC meetings; Performance Indicator (PI) reviews; scheduling drills and exercises; evaluating EP-related industry events; and the EP staff's continuing training needs. Revisions to the charter that were being evaluated included position titles of members and additional EP training issues.

The inspectors required additional documents than were available in the Action Plan steps' closure packages in order to assess progress made subsequent to a step's closure date and to verify continued operation of the initiated activities. Such requested documents that were provided by licensee staff included: revisions to the EPAC charter; EPAC meeting minutes; and NMC Policy CP 0065, "Emergency Response Organization," Revision 0. This fleet-wide policy adequately established expectations

and requirements for ERO members and other employees. The policy also provided a foundation for the EPAC charter.

The inspectors reviewed the minutes of EPAC meetings and resulting actions for the first through the third quarter of 2004. These records and correspondences provided adequate summaries of the EPAC meetings and included: reviews of the EPAC charter for comment and updating; emergency plan and procedures revision updates; the status of the EAL upgrade project; updates to the drill and exercise schedule; ERO response team status; identification of new ERO members; and ERO duty roster updates.

The inspectors also reviewed and discussed the EP Training Advisory Committee (TAC) meetings' minutes between July 15 and October 31, 2003. Topics and actions that were associated with these meetings included: training needs; human performance issues; changes to the EP training program; management expectations; and corrective actions that impacted EP training. However, the inspectors determined that the EP TAC meetings had ceased. The EP staff and management determined that EP training needs would be better served if the EP TAC's efforts were incorporated into the EPAC. Since EPAC meetings were already being conducted and included EP training needs, as well as having a higher level of management representation, the licensee decided that it would be a more efficient and effective to conduct only the EPAC meetings. As a result, EP TAC meetings ceased and EPAC meetings included additional EP training matters to the agenda, as indicated in subsequent EPAC meetings' minutes. The inspectors noted that one difference between the EP TAC and EPAC meetings was that the EP TAC met monthly and the EPAC met quarterly. The inspectors identified no concerns with this frequency difference.

The inspectors reviewed and discussed the EP vision and mission statement that had been communicated in a newsletter titled "NMC Today," dated June 17, 2003. The vision and mission statement adequately identified the role of EP at the plant and what was to be provided to the ERO members.

The inspectors reviewed and discussed the ERO Duty and Call Roster provided in the action step's closure package. The matrix adequately indicated ERO names, position titles, and duty dates from June 2, 2003, through January 4, 2004. The inspectors requested additional information, including an August 24, 2004, issue of the NMC Today newsletter, which provided information to the ERO on a replacement automated callout system and a slide show that had been e-mailed to all ERO members. A September 22, 2004, Daily Event Response Team roster, which was available on plant staff's computers, was also reviewed by the inspectors. This roster indicated the current EP training and drill teams. A September 18 Plan-of-the-Day Agenda included the on-call duty list and the weekend coverage list. These documents were all driven by the "Site Expectations for Performance of Station Duty Team Members" notice and NMC Policy CP 0065.

The inspectors reviewed and discussed the EP staff's training attendance records associated with training on the CAP. Attendance records from March 17 through June 13, 2003, indicated that all EP staff had attended training on the action request process and CAP. The inspectors requested additional training records due to the addition of several EP staff members since June 2003. No concerns were identified.

The inspectors also reviewed the following documents: Revision 1 of the Action Request Process Lesson Plan; Revision 11 of EP Maintenance Procedure (EPMP) 3.2, Offsite Personnel and Emergency Preparedness Staff Training; an August 5, 2004, Daily CAP Review List; and a CAP trend report from a July 2004 Point Beach CAL Excellence Focus Area review. These documents and discussions at daily EP staff meetings, which included CAP status, provided adequate verification of the EP staff's training on the plant's CAP.

The inspectors reviewed and discussed Apparent Cause Evaluation (ACE) 001365 for a Decrease in the Drill and Exercise Performance (DEP) PI and the Quarterly Effectiveness Review Reports for the EP program for the first and second quarters of 2003. The inspectors concluded that this ACE and these quarterly reports were the beginnings of an effort to conduct an overall effectiveness review for improving the plant's EP infrastructure. Documents associated with the ACE adequately identified several problems in the PI records and corrective actions to address these problems. The effectiveness reviews for first and second quarters of 2003 indicated an improving trend for self-identification of EP issues and a need for better methods of sorting the more than 100 CAPs assigned to the EP staff. The documents reviewed also indicated a leveling off of the corrective actions backlog.

The inspectors noted that EP staff and management recognized that Steps 14 and 15 of Action Plan OP-09-001 were essentially redundant. As a result, Step 14 was closed and Step 15 was retained with its due date of December 15, 2004.

The inspectors identified no concerns and had no further questions at this time regarding Steps 1, 2, 3, 5, 8, 14, and 15 of Action Plan OP-09-001. The adequacy of the licensee's activities associated with the other steps of this Action Plan will be assessed in future CAL follow-up inspections.

ii. **Action Plan OP-09-002: Improve Processes for Conducting and Critiquing Drills and Exercises**

a. Scope

The licensee considered Steps 1 through 8 and Step 10 of this Action Plan to be complete. Step 9 was an effectiveness review associated with the biennial EP exercise that was scheduled on December 7, 2004.

Steps 1 through 8 and 10 encompassed the following: developing and implementing a drill and exercise procedure; developing an annual drill and exercise schedule for senior management's approval; verifying and revising the master list of EP drill and exercise objectives to be demonstrated every six years; implementing a tracking method for these objectives; developing pass/fail criteria for these objectives; formalizing the critique process; and formalizing the processes to document and track critique items from drills and exercises.

b. Implementation of Action Plan Steps

The inspectors reviewed and discussed Revision 5 of procedure EPG 1.0, "Emergency Preparedness Drill Guideline." This procedure adequately summarized the roles and responsibilities of licensee personnel involved in the following activities: developing and approving the annual EP drill and exercise schedule; selecting and tracking objectives; developing scenarios; and controlling, evaluating, observing, and otherwise participating in drills and exercises. The procedure encompassed the various EP drills and exercises described in the emergency plan. The procedure also included adequate guidance on the critique process and on categorizing critique items.

The inspectors verified that the licensee reassessed its records of completed drill objectives since Fall 1997 and had computerized a 6-year list of exercise objectives. The inspectors also concluded that the licensee developed adequate pass/fail criteria for these objectives.

Procedure EPG 1.0 indicated that the annual drill and exercise schedule was to be developed and approved during the third calendar quarter. The inspectors verified that the 2004 schedule had been approved by the Site Vice President and added to the plant's schedule, while the 2005 EP drill schedule was being finalized during this inspection.

The inspectors had no further questions at this time regarding Steps 1 through 8 and Step 10 of Action Plan OP-09-002. The inspectors also had no concerns on the completeness of information contained in these steps' closure packages. The adequacy of Step 10's effectiveness review will be assessed in a 2005 CAL follow-up inspection.

iii. **Action Plan OP-09-003: Revise Emergency Plan Implementing Procedures (EPIP)**

a. Scope

The inspectors reviewed and discussed the licensee's actions associated with Steps 1 through 5 of this Action Plan, which the licensee listed as complete in Revision 4 of its Excellence Plan. These Steps encompassed the following activities: forming a team of licensee staff to evaluate the current revision of each chapter and appendix of the emergency plan, as well as the plan's implementing procedures, versus regulatory requirements and guidance; drafting revisions to the plan and procedures, as needed; and completing reviews of such proposed revisions to the plan and implementing procedures in accordance with the requirements of Title 10 of the Code of Federal Regulations (CFR) 50.54(q).

The inspectors reviewed and discussed the three revisions of the licensee's Procedure NP 1.8.3 for conducting 50.54(q) evaluations that were in effect from July 2003 through the end of this inspection. The inspectors also reviewed and discussed samples of the licensee's 50.54(q) evaluations of proposed changes to the plan and various EPIPs. The inspectors also reviewed CAP documents associated with several changes to the emergency plan.

b. Implementation of Action Plan Steps

The inspectors verified that Steps 1 through 3 were completed in mid-2003. Specifically, a team of licensee staff were assigned to review the current revisions of the plan and implementing procedures versus the regulatory requirements and guidance. The inspectors reviewed a sample of CAP documents associated with Step 1, which involved the licensee's review of its emergency plan versus relevant NUREG 0654 criteria and relevant portions of 10 CFR Part 50, and verified that several relatively straight forward changes were completed. For example, letters of agreement with several physicians were updated. Also, descriptions of the 10 and 50-mile Emergency Planning Zones (EPZ) were revised for consistency.

Steps 4 and 5 involved drafting changes to the emergency plan and implementing procedures, as needed, and performing 10 CFR 50.54(q) reviews of these changes. The inspectors noted that the licensee identified that certain changes to Sections 5 and 6 of the emergency plan could be considered as decreasing the plan's effectiveness. As a result, the licensee submitted its proposed changes to Sections 5 and 6 of the plan for review and approval by NRC Headquarters staff prior to implementation of the changes. The NRC Headquarters staff's review of this submittal is ongoing. Following NRC's approval of the revisions to Sections 5 and 6 of the plan, further inspection will be needed in 2005 to determine if the changes made to these sections of the plan were adequately incorporated in relevant EIPs and subsequent training.

The inspectors determined that the licensee's reviews of revisions to its emergency plan and EIPs, which were associated with Step 5 of Action Plan OP-09-003, were performed using either Revision 1 or 2 to Procedure NP 1.8.3, which was titled "10 CFR 50.54(q) Evaluations." The inspectors reviewed and discussed Revisions 1 and 2 of NP 1.8.3 with plant and corporate office EP staff. The inspectors selected a sample of the licensee's 50.54(q) reviews of plan and EIP revisions to determine if the use of either Revision 1 or 2 of this procedure would result in adequate documentation of the bases of changes contained in these revisions and assessment of whether a change may be considered a decrease in effectiveness.

In general, the inspectors concluded that the justification and level of documentation contained in the sample of the licensee's 10 CFR 50.54(q) reviews did not provide enough information to enable the inspectors to determine either: (1) how the licensee concluded that a decrease in effectiveness did not occur in a plan or procedure revision; or (2) whether the licensee concluded that a change to the plan or an implementing procedure was a decrease in effectiveness. The following examples illustrate each type of the inspectors' concerns.

Table 7-3 of Revision 47 to Section 7 of the emergency plan indicated that siren 013 of the EPZ's sirens was relocated from a high school's grounds to a street corner in Two Rivers, Wisconsin. The 10 CFR 50.54(q) documentation of this change indicated that the "siren is in the same general location and provides the same coverage as before. Therefore, the effectiveness of the Emergency Plan is not reduced." However, the 50.54(q) review did not include sufficient justification and documentation to support the licensee's conclusion that a decrease in effectiveness did not occur. For example, the 50.54(q) review did

not include or reference items such as a siren coverage map depicting before and after decibel levels for the affected coverage area, documentation that the population within the coverage area did not change decibel level requirements, or an assessment indicating that background noise level readings at the siren's new location were not higher than at the siren's old location. The 50.54(q) review also did not include an assessment of whether the siren's relocation may have required prior approval by the Federal Emergency Management Agency (FEMA). Therefore, the inspectors were unable to determine whether this siren's relocation may be a decrease in the emergency plan's effectiveness.

Another example was in Revision 47 of Section 6 of the emergency plan and Revision 32 of associated EPIP 1.3, "Dose Assessment and Protective Action Recommendations (PAR)." Both revisions were made to add the option of sheltering to the range of offsite PAR. The licensee's associated 50.54(q) evaluations indicated that the change (addition of the sheltering option) did not remove the "licensee's processes or abilities to detect and assess conditions which require PARs to be made." The 50.54(q) evaluations also included a statement that the change did not decrease the effectiveness of the emergency plan. However, the 50.54(q) evaluations did not indicate why the licensee concluded that its processes or abilities to detect and assess conditions requiring offsite PARs were not removed or negatively affected. Therefore, the inspectors were unable to conclude from the licensee's 50.54(q) evaluations whether the licensee considered the addition of the sheltering option to Revision 47 of Section 6 of the plan and Revision 32 to EPIP 1.3 to be a decrease the effectiveness of its emergency pre-planning.

The inspectors reviewed and discussed with plant and corporate EP staff Revision 3 of Procedure NP 1.8.3. The licensee indicated that Revision 3 was the plant-specific implementation of a fleet-wide procedure that was developed for use at all NMC-operated sites, and that Revision 3 did not become effective at the Point Beach Plant until July 21, 2004. The inspectors noted that implementation of Revision 3 did not result in a licensee decision to re-assess its 50.54(q) evaluations that had been performed using earlier revisions of NP 1.8.3. The inspectors also noted that no other emergency plan or EPIP revisions were available that were evaluated in accordance with Revision 3 to Procedure NP 1.8.3. Therefore, the inspectors could not determine whether proper use of Revision 3 would result in adequately detailed 50.54(q) evaluations of proposed plan and implementing procedure changes.

The inspectors discussed the processes by which plant personnel could submit requests for emergency plan and EPIP changes. The EP staff indicated that such change requests were received by e-mail, by submittal of drill and exercise critique forms, or by submittal of Form PBF-0026p of Procedure NP 1.1.3, which was titled "Procedure Preparation, Review, and Approval." The EP staff acknowledged that the use of Form PBF-0026p was the only method of submitting requests for plan and procedure changes that was in accordance with Procedure NP 1.1.3.

In response to the inspectors' concerns on the level of detail available in its 50.54(q) evaluations associated with plan and EPIP revisions, the licensee initiated CAP059392.

The inspectors will assess the adequacy of the resulting corrective actions during future CAL follow-up inspections associated with Step 4 and subsequent steps of Action Plan OP-09-003.

iv. **Action Plan OP-09-004: Upgrade the Emergency Action Levels (EAL)**

a. Scope

The inspectors reviewed and discussed records associated with Steps 1 through 11 of this Action Plan, which the licensee considered to be complete prior to September 2004.

Steps 2 through 6 addressed the eight EALs that NRC staff had determined to have been incorrectly revised without prior NRC approval and had, therefore, decreased the effectiveness of the licensee's emergency plan, as described in NRC Inspection Report 05000266/2003007; 05000301/2003007, dated February 4, 2004. Steps 2 through 6 were actions to restore the wording of incorrectly revised eight EALs to wording that was previously approved by NRC.

Step 1 and Steps 7 through 11 encompassed the following activities: hiring a contractor to develop a proposed EAL scheme based on the NRC-endorsed guidance of Revision 4 of the Nuclear Energy Institute (NEI) 99-01 publication; drafting of the proposed EAL scheme; obtaining State and county officials' agreement on the proposed EAL scheme, and submitting the proposed EAL scheme for NRC Headquarters staff's review and approval.

b. Implementation of Action Plan Steps

The inspectors determined that the licensee adequately completed Steps 2 through 6, which involved revisions to Appendix B of the emergency plan and the relevant EPIP following agreement on the rewording of the eight EALs of regulatory concern by offsite officials and completion of the internal approval process. The inspectors had no further questions on licensee actions completed on Steps 2 through 6.

The inspectors also verified that the licensee completed Step 1 and Steps 7 through 10 prior to June 25, 2004. Step 11, which was to submit the proposed EAL scheme change for NRC Headquarters staff's review, was completed on June 25, 2004, which was several days prior to the deadline in the licensee's commitments. However, NRC Headquarters staff identified a number of concerns with the quality and completeness of information in the licensee's late June EAL scheme change submittal. As a result, a revised submittal was necessary to meet the acceptance criteria of NRC Headquarters staff who were responsible for reviewing and approving a licensee's revised EAL scheme. Thus, Steps 7 through 11 of Action Plan OP-09-004 essentially needed to be redone.

On September 2, 2004, a Public Meeting was held at NRC Headquarters to discuss NRC staff's concerns on the licensee's June 25 submittal. As a result, the licensee planned to first revise and then resubmit its proposed EAL scheme change and supporting information. The inspectors determined that the licensee was

planning to conduct detailed reviews of its planned re-submittal with its EAL contractor, representatives of several plant departments, and EP counterparts from other IMC sites. In late September, the licensee also planned to conduct a "challenge board" review of its revised submittal by several non-IMC EP specialists. The licensee also scheduled an early October meeting with relevant State and county officials on its revised submittal and established a goal of making its revised EAL scheme change submittal to NRC Headquarters in mid-October 2004.

As of September 24, 2004, the inspectors concluded that the licensee was making adequate progress on actions leading up to sending its revised, proposed EAL scheme change and supporting information submittal to NRC Headquarters. However, further inspection of the licensee's records associated with its having to redo Steps 8 through 11 of Action Plan OP-09-004 will be needed in 2005. Following NRC Headquarters staff's approval of the upgraded EAL scheme, further inspection will also be required on this Action Plan's subsequent steps associated with training and other implementation aspects of this EAL scheme change.

v. **Action Plan OP-09-005: Control and Maintenance of EP-Required Equipment**

a. Scope

The inspectors reviewed and discussed records associated with Steps 1 through 9 of this Action Plan. Steps 1 through 3 involved the development and management reviews of matrices of EP-related equipment associated with the Control Room, Technical Support Center (TSC), Operations Support Center (OSC), Emergency Operations Facility (EOF), Alternate EOF (AEOF), the Joint Public Information Center (JPIC), and the EAL scheme. These matrices were developed due to concerns regarding documentation and configuration control of EP-related equipment, and to facilitate licensee actions during subsequent steps of this Action Plan.

Steps 4 through 9 encompassed the following tasks: documenting the licensing basis of the EP-related equipment; evaluating whether each piece of equipment met its EP requirements; assessing the equipments' reliability, maintainability, and obsolescence; assessing the adequacy of preventive maintenance; assessing the need for new or revised preventive maintenance procedures; and creating and/or formalizing administrative processes to be implemented when a radiation monitoring system would be placed out of service.

b. Implementation of Action Plan Steps

The inspectors verified that the aforementioned equipment matrices were developed by mid-December 2003. The inspectors also verified that licensee management reviews of the these matrices were completed in January 2004. The inspectors determined the licensee reviewed its licensing basis documents and adequately applied them to the aforementioned equipment matrices. As a result, the inspectors had no further questions on Steps 1 through 4 of this Action Plan.



The inspectors reviewed the licensee's report, which was associated with Step 5, that summarized its evaluation of the of equipment listed in the matrices versus the relevant functional requirements. The licensee's report identified a series of radiation monitors that did not meet functional status checks. Action Plan Step 5.A was added to address this concern. The licensee also initiated several CAP documents. Step 5.A's completion date is in mid-December 2004.

Step 6 involved the licensee's assessment of EP-related equipment for reliability, maintainability, and obsolescence. The inspectors reviewed the licensee's assessment report and noted that several types of equipment were identified for further action, such as removal or replacement of the existing backup microwave communications system, the seismic monitoring system, elements of the fire protection system, and the meteorological monitoring system. Action Plan Step 6.A was added to address the need for a backup microwave system. Step 6.A's completion date is in mid-December 2004. Since upgrades for the seismic monitoring system, fire protection system, and meteorological monitoring system were already being tracked by other CAP documents, additional Action Plan steps were not created for these systems.

In Summer 2003, the licensee considered its meteorological monitoring program upgrade project to be among the plant's top priorities for reasons summarized in Inspection Report 05000266/2003007; 05000301/2003007. As a result, the inspectors performed relatively more detailed records reviews and discussions on the status of this system upgrade project.

This meteorological monitoring system upgrade project's study phase was completed in February 2004. The licensee decided that the system upgrade would include replacement of the systems' three towers, associated instrumentation, signal processing equipment, and, as needed, signal transmission equipment. The licensee's evaluations indicated that the current monitoring system should remain capable of performing its function until 2006, barring extenuating circumstances.

On July 8, 2004, the licensee's Project Review Board authorized funding for calendar year 2004 to complete the design phase of the monitoring system upgrade project. Design phase activities included the following tasks: development of a project plan and schedule; development of a bid specification; preparation of the design package; review and approval of the design package; bidder evaluation and selection; and obtaining the Project Review Board's approval for the installation phase.

On September 20, 2004, an inspector attended the design phase's initial meeting. The project manager expressed the goals of seeking funding in Fall 2004 for the project's installation phase in calendar year 2005 and completion of the upgraded equipment installation by October 2005. The inspectors' overall conclusion was that the licensee was making adequate progress on its meteorological monitoring system upgrade project.

Step 7 involved the licensee's assessment of the adequacy of preventive maintenance being performed on EP-related equipment. The inspectors reviewed the licensee's report and noted that the report identified an inadequate maintenance program for the plant's seismic monitoring instrumentation. As a result, the licensee initiated several

CAP documents. Steps 8 and 9 had due dates in late September 2004. The inspectors concluded that the licensee was making adequate progress on these steps.

Follow-up inspection of licensee actions associated with Steps 5 through 9 of Action Plan OP-09-005 will be planned in 2005.

vi. **Action Plan OP-09-006: Include Sheltering Option in Protective Action Recommendations (PAR)**

a. Scope

The inspectors reviewed and discussed Action Plan Steps 1 through 5 associated with including sheltering in the licensee's range of PARs. Step 1 involved meeting with State and county officials to discuss re-establishing sheltering as a PAR option. Step 2 involved revising the emergency plan and EIPs to incorporate sheltering as a PAR option. Steps 3 and 4 involved conducting a briefing and meetings with appropriate ERO members on sheltering as a potential PAR. Step 5 encompassed meeting with the State of Wisconsin, State of Minnesota, Prairie Island Plant, and Kewaunee Plant EP personnel to discuss specifically recommending sheltering, and revising the State and county initial notification message form to include provisions for a sheltering recommendation.

b. Implementation of Action Plan Steps

The inspectors determined that changes in State and county emergency plans that were associated with the implementation of the 1992 revision of the Environmental Protection Agency's publication "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" apparently resulted in the removal of sheltering as a PAR option from the Point Beach Plant's emergency plan and implementing procedures.

The inspectors verified that a meeting with State and county representatives occurred to discuss implementing sheltering as a PAR by reviewing minutes of the Utility Planning Committee meeting on October 16, 2003, and an EPZ Roundtable Meeting on November 10, 2003. Licensee and the State of Wisconsin staffs agreed to revise the initial notification message form to provide for a sheltering PAR by adding section 10.[c] "OTHER." The inspectors also interviewed a licensee Dose/PAR Coordinator to further ensure that it was understood that sheltering was an available PAR and that the initial notification message form provided for its notification.

The inspectors verified that the licensee's emergency plan and relevant implementing procedures were appropriately revised to include sheltering in the range of protective actions. These revisions occurred on November 26, 2003. However, as noted in Section 1.iii of this inspection report, the licensee's 10 CFR 50.54(q) review process did not provide adequate bases for these revisions.

The inspectors reviewed and verified that affected ERO personnel were briefed on the changes to allow sheltering as a PAR. This briefing was conducted via an e-mail from the EP Manager to the appropriate ERO population on November 26, 2003, which was

the effective date of the plan and implementing procedure changes. A list of those personnel receiving the email was requested and reviewed by the inspectors. No concerns were identified.

The inspectors also verified that a meeting was held on December 10 with the licensee's Dose/PAR Coordinators to discuss when to specifically recommend sheltering as a PAR. The inspectors reviewed a matrix that was developed at this meeting that was to be presented to State and county officials. This matrix provided guidance to relevant ERO members as to when sheltering was to be specifically recommended.

The inspectors reviewed minutes of a meeting held on January 8, 2004, with Wisconsin and Minnesota officials, as well as a Utility Planning Committee meeting held on January 14, 2004, during which the licensee presented a discussion on when its staff would provide sheltering as a PAR. The inspectors noted that further discussions were to be held on this topic as more information became available from NRC and industry.

On August 8, 2004, NRC issued Regulatory Information Summary 2004-13, "Consideration of Sheltering in Licensee's Range of Protective Action Recommendations." The inspectors will conduct a follow-up inspection in 2005 to assess the adequacy of the licensee's review of this NRC document and its potential impact on the licensee's previously completed actions to re-establish sheltering as a PAR option in its emergency plan and implementing procedures.

## **2. Other Inspection Activities**

### **i. Potential Relocation of Certain Emergency Response Facilities**

#### **a. Scope**

The inspectors reviewed documents and discussed with licensee EP staff the status of the licensee's ongoing evaluation of options being considered for changing the current location(s) of the near-site Emergency Operations Facility (EOF), the Alternate EOF (AEOF), and/or the Joint Public Information Center (JPIC). The Point Beach Plant's current EOF was housed in the plant's Site Boundary Control Center (SBCC). An AEOF was required because the SBCC was within the plant's plume exposure pathway EPZ. The Point Beach Plant's AEOF and JPIC were work areas within the Wisconsin Public Service (WPS) Company's offices in Green Bay, Wisconsin. These work areas also served as the EOF and JPIC for WPS's Kewaunee Plant.

#### **b. Status of Licensee Activities**

The inspectors concluded that the potential sale of the Kewaunee Plant by WPS to Dominion Resources was the apparent major reason for the ongoing reassessment of the locations of the Point Beach Plant's AEOF and JPIC. The planned sale of the Kewaunee Plant would also result in removing the Kewaunee Plant's EOF and JPIC from the WPS Company's Green Bay Offices.

During August and September 2004, Point Beach staff were considering several options. One was to relocate the EOF and JPIC to a location roughly 10 to 20 miles South to Southwest from the Point Beach Plant. Such a relocation would eliminate the need for an AEOF; however, this option would result in the Point Beach and Kewaunee Plants no longer having a common JPIC. The licensee was also evaluating the option of seeking the use of a building, which was recently purchased by Dominion Resources to be the Kewaunee Plant's proposed EOF and JPIC, to also house the Point Beach Plant's AEOF and to provide a common JPIC for both plants. Selection of this option would result in the continued use of SBCC work space as the Point Beach Plant's near-site EOF.

The inspectors were informed that discontinuing use of the aforementioned WPS Company work spaces in Green Bay as emergency response facilities for either the Kewaunee or Point Beach Plants need not be accomplished at the same time as the planned sale of the Kewaunee Plant, as long as acceptable efforts were being made towards establishing new offsite emergency response facilities for each plant. Other impacts of the potential sale of the Kewaunee Plant included: assignment and training of personnel from each plant to fulfill certain JPIC staff functions, such as media monitoring and rumor control, that were currently assigned to WPS staff; and identifying communications systems, equipment, and computer links that currently involved WPS assets and establishing adequate replacements, as needed.

The inspectors concluded that Point Beach EP staff were adequately aware of the need to assess whether changes to the EOF, AEOF, and/or JPIC could constitute a decrease in the Point Beach Emergency Plan's effectiveness if implemented without prior NRC approval, as well as the need to keep State and local officials informed of planned changes to the locations of any of the aforementioned facilities and any relevant changes to associated communications equipment. The inspectors also concluded that Point Beach, Kewaunee, and NMC corporate office EP staffs were adequately coordinating with WPS staff.

ii. **Other EP Program Impacts Due to Potential Sale of Kewaunee Plant**

a. Inspection Scope

On July 8, a working meeting, which involved representatives from NMC, Point Beach Plant, Kewaunee Plant, WEnergies, WPS, and Dominion Resources, was held to discuss the impacts on either or both plants' EP programs if the Kewaunee Plant would be sold. The inspectors reviewed records of this working meeting to determine the potential impacts on the Point Beach Plant's EP program, including ongoing efforts on the six EP-related Action Plans.

b. Status of Licensee Activities

The Point Beach and Kewaunee Plants' plume exposure pathway EPZs overlapped in portions of Manitowoc and Kewaunee Counties. For years, the scheduled and non-scheduled maintenance activities for both plants' Alert and Notification System (ANS) sirens were performed by WPS staff, who were not Kewaunee Plant staff. Point Beach

EP staff accepted the lead responsibility to identify a provider of EPZ siren maintenance services for both plants if the Kewaunee Plant would be sold.

The inspectors understood that offsite officials periodically reported ANS test results to FEMA by county rather than by EPZ. As a result, each plant's ANS PI statistics were reported quarterly by Point Beach and Kewaunee Plant staffs to NRC by county rather than by EPZ. The inspectors understood that ANS test results would continue to be reported to FEMA and NRC by county if the Kewaunee Plant would be sold. Similarly, the inspectors understood that the existing arrangements for developing and annually distributing emergency information literature for the permanent and transient populations of both plants' EPZs would be continued if the Kewaunee Plant would be sold.

As indicated by the slides prepared for this working meeting, the attendees recognized the needs to keep State, county, and Federal officials informed of other changes affecting both plants' onsite offsite emergency planning programs besides EOF and JPIC relocations if the Kewaunee Plant were sold, such as the following matters: training of offsite responders; continuing EP counterpart meetings with offsite officials; and reviewing State and county emergency plans for needed changes. For example, the pre-planned location of the State's Forward Command Post was a WPS facility in Two Rivers, Wisconsin. The attendees also recognized the need to determine if this facility would remain available if WPS sold the Kewaunee Plant. If not, then the identification of a new location for this command post would result in a revision to the State's Plan and relevant standard operating procedures.

It was also noted at this working meeting that the staffs of both plants relied on each other to calibrate certain types of radiological instruments used at both plants. Laboratory facilities at the Kewaunee Plant were also a back-up location for performing radiological analyses of samples collected by Point Beach staff during an emergency.

Based on discussions with licensee staff and records reviews, the inspectors concluded that the licensee staffs involved in assessing the impacts of the potential sale of the Kewaunee Plant on both plants' EP programs were conducting this business in a cooperative manner and had adequate intentions to keep affected State, county, and Federal officials informed of relevant changes. The impacts on both plants' EP programs due to the potential sale of the Kewaunee Plant will be subject to further inspection at both plants.

1. Exit Meetings

On August 6, 2004, the inspectors presented preliminary, interim inspection results to Ms. R. Milner and members of plant staff. The licensee acknowledged the results and did not identify any information as proprietary.

On September 24, 2004, the inspectors presented the preliminary inspection results for the September 2004 portion of the inspection to Mr. J. Shaw and members of plant staff. The licensee acknowledged the results and did not identify any information as proprietary

ATTACHMENT: SUPPLEMENTAL INFORMATION

## SUPPLEMENTAL INFORMATION

### KEY POINTS OF CONTACT

#### Licensee

J. Shaw, Plant Manager  
J. Brander, Maintenance Manager  
J. Connolly, Regulatory Affairs Manager  
Z. Dent, EP Specialist  
B. Dungan, Operations Manager  
T. Gemske, EP Supervisor  
R. Johnson, EP Coordinator  
K. Kappelman, EP Trainer  
R. Milner, Business Manager  
M. Ray, EP Manager  
S. Ruesch, Procedures Manager  
P. Russell, Site Assessment Manager  
J. Schweitzer, Director of Engineering  
S. Thomas, Radiation Protection Manager  
M. Vonk, Senior EP Specialist, IMC  
J. Walsh, Manager of Projects  
D. Weaver, Nuclear Asset Manager  
E. Weinkamp, Regulatory Services Director, IMC

#### NRC

P. Loudon, Chief, Reactor Projects Branch 7, Region III

### LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1. Review of Select Steps of the Six EP Action Plans of the Excellence Plan

Letter to NRC Document Control Desk; Commitments in Response to 95003  
Supplemental Inspection; dated March 22, 2004

NP 1.1.9; Point Beach Nuclear Plant Excellence Plan; Action Plans OP-09-001 through  
OP-09-006; Revision 4

CA030458; EPAC Charter; Revision 0; dated July 8, 2003

Draft EPAC Charters; Revisions 1 and 1a

First and Third Quarter EPAC Meeting Minutes; dated March 31 and September 23, 2004

Internal Memorandum; EPAC Response Actions; dated April 22, 2004

Corporate Policy 0065; IMC Policy Emergency Response Organization; dated May 30, 2003

Internal Memorandum 2003-0647; EP TAC Minutes from July 15, 2003, Meeting

Internal Memorandum 2003-0788; EP TAC Minutes from October 31, 2003, Meeting

IMC Today Newsletter Article; Emergency Planning Vision and Mission Statement; dated June 17, 2003

Plan-of-the-Day Agenda; dated September 20, 2004

Site Expectations for Performance of Station Duty Team Members; dated August 26, 2004

ERO Duty and Call Roster; dated July 15, 2003

2004 Event Response and EP Training Team Schedule

EP Training/Drills Teams List; dated August 5, 2004

IMC Today Newsletter Article; Updated ERO Callout System Implementation; dated August 24, 2004

Daily Event Response Team List; dated September 27, 2004

EPMP 3.2; Offsite Personnel and Emergency Preparedness Staff Training; Revision 11

Lesson Plan ORI-01-LPARP; Action Request Process; Revision 1

EP Staff Attendance Transcripts From March 17, 2003 through August 21, 2003

CAL Excellence Focus Area CAP Trend Report; dated July 29, 2004

Daily CAP Review List; dated August 5, 2004

ACE 001365; Decrease in Emergency Preparedness DEP PI; dated July 21, 2003

Quarterly Effectiveness Review Report For Emergency Preparedness for First and Second Quarters of 2003

EPG 1.0; Emergency Preparedness Drill Guideline; Revision 5

Point Beach 2004 EP Drill and Exercise Schedule; Revisions Effective on August 1 and September 16, 2004

CA030499; Include Drill and Exercise Dates in the Production Work Schedule

CA030500; Verify the Accuracy of the List of Drill Objectives Demonstrated Over the Last Six Years

CA030501; Revise the Drill Objectives Matrix to Ensure Conformance with Regulatory References

CA030502; Implement a Tracking System to Ensure All Objectives are Demonstrated in a Six Year Cycle

CA030503; Define Pass/Fail Criteria for Each Objective in the Drill and Exercise Objectives List

CA030504; Request the Site Vice President's Approval of the 2004 Drill and Exercise Schedule

CA030505; Formalize the Drill and Exercise Critique Process

CA030506; Formalize the Drill and Exercise Lessons Learned Process

CA030509; Evaluate the Emergency Plan Versus the CFR and NUREG 0654

CAP032978; Obtain Letters of Agreement with Two Local Physicians

CA029953; Finalized Letters of Agreement with Two Local Physicians

CAP032979; Inconsistently Defined Borders of 10 and 50 Mile EPZs in Emergency Plan and EIPs

Procedure NP 1.1.3; Procedure Preparation, Review, and Approval; Revision 3

Procedure NP 1.8.3; 10 CFR 50.54(q) Evaluations; Revision 1; dated July 2, 2003

Procedure NP 1.8.3; 10 CFR 50.54(q) Evaluations; Revision 2; dated January 15, 2004

Procedure NP 1.8.3; 10 CFR 50.54(q) Evaluations; Revision 3; dated July 21, 2004

CA030549; Issue Revised EIPs - Action Plan OP-09-003

CA052681; Draft Emergency Plan and EPIP 1.2 Revisions for the Interim Changes to the NUREG 0654-based EALs of Regulatory Concern

CA052682; Plant Onsite Review Committee Approval of Interim EAL Changes

CA052683; Submit Interim EAL Changes for State and County Officials' Reviews



CA052686; Conduct Training on Interim EAL Changes

Four Letters to State and County Officials Requesting Agreement on Interim EAL Changes; dated October 30, 2003

Lesson Plan EPC-04-LP002; EAL Revisions; Revision 0

Training Records Associated with Interim EAL Changes; dated January 15 through January 20, 2004

CA055057; Complete Restoration Steps for the Eight EALs of Regulatory Concern to Their Previously Approved Wording

CAP059436; Draft EAL Documents Require Extensive Revision/Review (before re-submittal to NRC)

CA052384; Control EP Required Equipment Matrix - SBCC/EOF

CA052385; Control EP Required Equipment Matrix - TSC

CA052386; Control EP Required Equipment Matrix - OSC

CA052388; Control EP Required Equipment Matrix - Control Room

CA052389; Control EP Required Equipment Matrix - AEOF/JPIC

CA052390; Control EP Required Equipment Matrix - EAL Classification

CAP050222; OP-09-005 Matrix for EP Equipment Spreadsheet

CA052408; EP Required Equipment Matrix Review

CA052409; EP Required Equipment Licensing Basis

CA058134; Lessons Learned from First NRC CAL Inspection - EP Sustainability Assessments

CA050222; Matrix for EP Equipment Licensing Basis Document (with attached references)

CA058251; EP Required Equipment Functional Requirements

CA052413; EP Required Equipment Functional Requirements

CAP057242; Some EP Equipment Does Not Meet Functional Requirements

CE014162; Some EP Equipment Does Not Meet Functional Requirements

CA058300; Some EP Equipment Does Not Meet Functional Requirements

CA050222; Matrix for EP Equipment Spreadsheet Update

Request for Phased Authorization; Meteorological Towers Upgrade; Revisions 1 and 2

Project Scope Proposal; Meteorological Towers Upgrade Project; dated February 24, 2004

Meteorological Towers Upgrade - January 2004 Project Report; dated February 27, 2004

Request for Phased Authorization; Meteorological Towers Upgrade; Revision 2; dated June 18, 2004

Project Scope Proposal; Meteorological Towers Upgrade Project; dated June 18, 2004

Project Authorization Request Form; Meteorological Towers Upgrade Project; dated July 15, 2004

EPMP 5.0; Post-Three Mile Island Meteorological Monitoring Program Design, Operation, and Maintenance; Revision 8; dated July 20, 2004

Draft Point Beach Meteorological Tower Refurbishment Project; Revision 1; dated August 3, 2004

Draft Project Plan - Met Tower Upgrade Project; dated September 14, 2004

Meteorological Towers Upgrade Project Monthly Status Report - August 2004; dated September 17, 2004

CA052414; EP Required Equipment Assessment

CA050222; Matrix for EP Equipment Spreadsheet Update

CA057244; Some EP Equipment Obsolete, Unreliable, and Not Maintainable

CE014163; Some EP Equipment Obsolete, Unreliable, and Not Maintainable

CA058252; EP Required Equipment Assessment

CA058315; Some EP Equipment Obsolete, Unreliable, and Not Maintainable

CA058361; Some EP Equipment Obsolete, Unreliable, and Not Maintainable

CA052415; Evaluate Adequacy of EP Required Equipment Preventative Maintenance

CAP057246; Seismic Monitor Preventive Maintenance Determined to be Inadequate

Internal Correspondence 2004-0371; CA050222; Matrix for EP Equipment Spreadsheet Update

CA052417; Revise EP Required Equipment Preventive Maintenance Procedures and Call-ups as Needed

SEI-06212-AA; Call-up for Seismic Event Indicator

SEI-0613-AA; Call-up for Seismic Event Indicator

CA052419; EP Required Equipment RMS Database Updates

Form PBF-2068g; Status of a Radiation Monitoring System Channel Not in Service

Emergency Plan Section EP 6.0; Emergency Measures; Revision 48; dated March 4, 2004

EPIP 1.3; Dose Assessment and Protective Action Recommendations; Revision 34; dated March 4, 2004

Lesson Plan EPC-04-LP001; 2004 EP Procedure Revisions; Revision 0

OE17080; Protective Action Recommendation Upgrade Missed During a Change in Weather Conditions - Emergency Drill Related

Training Attendance Records; EPC-04-LP001

Nuclear Accident Reporting System Form

CA059209; Work with State of Wisconsin on Notification Form

CA059211; Document Results of Sept Mtg - Potential Condition Adverse to Quality

Minutes of Utility Planning Committee Meeting on October 16, 2003

Minutes of EPZ Roundtable Meeting on November 10, 2003

Minutes for Meeting on January 8, 2004 between NMC and the States of Wisconsin and Minnesota Staffs

Minutes of Utility Planning Committee Meeting on January 14, 2004

Form PBF-1301; 10 CFR 50.54(q) Evaluation Checklist; Revision 32 to EPIP 1.3; dated November 6, 2003

Form PBF-1301; 10 CFR 50.54(q) Evaluation Checklist; Revision 47 to Emergency Plan Section 6; dated November 6, 2003

2. Other Inspection Activities

Internal Memorandum; Relocation of the AEOF and JPIC; dated April 22, 2004

Project Plan; EOF/JPIC Facility Relocation for Point Beach Nuclear Plant; Revision 2; dated July 6, 2004

Slide Presentation; Emergency Preparedness Transition Planning - Sale of Kewaunee Plant; dated July 2004

Internal Memorandum; EOF/JPIC Relocation Project Options; dated July 29, 2004

Letter; Point Beach Nuclear Plant EOF/JPIC Relocation Project; dated August 2, 2004

Licensee Meeting Notes; Kewaunee Transition Meeting - July 2004

CAP057503; Arrange for Information Technology Staff to Have Local Area Network Availability at AEOF Once NMC Local Area Network is Replaced

CAP058126; Develop a Contract for Maintenance of the ANS of the Point Beach and Kewaunee Plant's Emergency Planning Zones

CAP058127; Prepare a Letter to WPS to Provide Estimated Milestones and Time Line to Vacate the AEOF/JPIC Facility

CAP058129; Provide WPS a List of Telephone Lines Needed by Point Beach at the Green Bay EOF/JPIC Facility

CAP058130; Find Replacements for the Media Monitoring and Control Functions Currently Performed by WPS Staff

CAP058147; Identify and Validate Communications Links Required for Continued Use of the AEOF in Green Bay

CAP058151; Prepare an Agreement with Dominion for Continued Use of the Kewaunee Plant's Site Boundary Facility for Direction and Control of Offsite Survey Teams' Activities if Point Beach's SBCC is Unavailable

CAP057831; Validate Kewaunee Plant Laboratory Equipment's Ability to Meet Geometry Requirements for Analyzing Environmental and Other Samples Provided by Point Beach Plant Staff During an Emergency

CA058535; Reconfigure Needed JPIC Computers to Link to NMC's Domain Rather than to WPS's Domain

CA058719; Walk-down of the WPS Office's AEOF and JPIC to Identify Communications Links Needed for Continued Use by Point Beach Responders

## LIST OF ACRONYMS USED

ACE	Apparent Cause Evaluation
AEOF	Alternate Emergency Operations Facility
ANS	Alert and Notification System
CA	Corrective Action
CAL	Confirmatory Action Letter
CAP	Corrective Action Program (Document)
CE	Condition Evaluation
CFR	Code of Federal Regulations
DEP	Drill and Exercise Performance
EAL	Emergency Action Level
EOP	Emergency Operations Facility
EP	Emergency Preparedness
EPAC	Emergency Preparedness Advisory Committee
EPIP	Emergency Plan Implementing Procedure
EPMP	Emergency Plan Maintenance Procedure
EPZ	Emergency Planning Zone
ERO	Emergency Response Organization
FEMA	Federal Emergency Management Agency
IMC	Inspection Manual Chapter
IP	Inspection Procedure
JPIC	Joint Public Information Center
NEI	Nuclear Energy Institute
NMC	Nuclear Management Company, LLC
NP	Nuclear Plant Administrative Procedure
NRC	U. S. Nuclear Regulatory Commission
NUREG	Nuclear Regulatory Guide
OSC	Operations Support Center
PBNP	Point Beach Nuclear Plant
PI	Performance Indicator
SBCC	Site Boundary Control Center
SDP	Significance Determination Process
TAC	Training Advisory Committee
TSC	Technical Support Center
WPS	Wisconsin Public Service Company