

August 2, 2005

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 05000266/2005009(DRS); 05000301/2005009(DRS)

Dear Mr. Koehl:

On July 1, 2005, the U.S. Nuclear Regulatory Commission (NRC) completed a special inspection at your Point Beach Nuclear Plant, Units 1 and 2. The purposes of the inspection were to review your progress in meeting the emergency preparedness commitments documented in the Confirmatory Action Letter (CAL), dated April 21, 2004, and to review your progress on a sample of other emergency preparedness program upgrade activities, as also summarized in Revision 6 of your Excellence Plan, dated March 17, 2005. The preliminary results of this inspection were discussed on July 1, 2005, with you and members of your staff.

The inspection examined activities conducted under the CAL and 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 representative records, observed activities, and interviewed personnel.

The inspector identified no violations of NRC requirements and no findings.

Selected steps of the Excellence Plan's four remaining Action Plans, which were associated with your emergency preparedness program, were reviewed during this inspection. Higher priority was placed on reviewing records packages of those steps that were specified in the CAL that had been reviewed by your Excellence Team and Independent Review Team. We concluded that good progress was made on the reviewed steps and that NRC has no further questions on the bulk of those steps reviewed during this inspection. We also concluded that there was an overall improvement in the quality of the records packages associated with these steps since the 2004 special emergency preparedness inspection.

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/*

Mark A. Satorius, Director  
Division of Reactor Projects

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

Enclosure: Inspection Report 05000266/2005009(DRS); 05000301/2005009(DRS)  
w/Attachment: Supplemental Information

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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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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

Report No: 05000266/2005009(DRS); 05000301/2005009(DRS)

Licensee: Nuclear Management Company, LLC

Facility: Point Beach Nuclear Plant, Units 1 and 2

Location: 6610 Nuclear Road  
Two Rivers, WI 54241

Dates: June 27, 2005 through July 1, 2005

Inspectors: T. Ploski, Senior Emergency Preparedness Inspector

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

Enclosure

## SUMMARY OF FINDINGS

IR 05000266/2005009(DRS); 05000301/2005009(DRS); 06/27/05 - 07/01/05; Point Beach Nuclear Plant, Units 1 & 2; Emergency Preparedness Special Inspection, Confirmatory Action Letter Follow-up.

This report covers a special inspection conducted by one Emergency Preparedness (EP) inspector on June 27 through July 1, 2005. The inspection's 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 a sample of other planned EP program upgrades that were also described in Revision 6 of the licensee's Excellence Plan, dated March 17, 2005. No findings 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-Revealed Findings**

None.

### **B. Licensee-Identified Findings**

None.

## REPORT DETAILS

### 1. Background

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 (IMC) 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.

The Excellence Plan was composed of Action Plans to address improvement areas for various plant programs. Specifically, Action Plans OP-09-001 through OP-09-006 were focused on the Point Beach Plant's Emergency Preparedness (EP) program. Each of these six Action Plans was composed of action steps with corresponding due dates. A subset of the Excellence Plan's action steps were part of the NMC's CAL commitment letter dated March 22, 2004.

An initial special EP inspection of portions of EP Action Plans OP-09-001 through OP-09-006 was conducted in August and September 2004. The results of this special inspection were documented in Inspection Report (IR) 05000266/2004007; 05000301/2004007, dated November 8, 2004. One result of this inspection was that NRC completed inspection of Action Plans OP-09-002 and OP-09-006. Another result was that NRC completed inspection of some steps associated with the other four EP-related Action Plans.

This 2005 special inspection was a continuation of the 2004 special EP inspection and was intended to review the licensee's progress in implementing its CAL commitments and some other steps that were also associated with the four remaining the Excellence Plan's Action Plans relevant to the plant's EP program. This 2005 special inspection consisted of interviews with personnel and reviews of Action Plan steps' closure packages, procedures, and other licensee documents. Higher priority was given to those steps of Action Plans OP-09-001, OP-09-003, OP-09-004, and OP-09-005 that were specified in the CAL and that had successfully completed reviews by the licensee's Excellence Team and Independent Review Team (IRT). Revision 6 of the licensee's Excellence Plan was referenced during this inspection.

2. Review of Completed Steps of the Four Remaining EP Action Plans

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

a. Inspection Scope

The inspector reviewed and discussed records associated with Steps 11 and 12, which were specified in the CAL.

b. Implementation of Action Plan Steps

The inspector determined that the licensee adequately completed Steps 11 and 12 of Action Plan OP-09-001 and had no further questions on these steps. Step 11 involved development of procedures, guidelines, or job aids to formalize the processes for EP staff members' responsibilities. Step 12 involved cross training of EP staff members based on these procedures, guidelines, and job aids to strengthen the EP staff's overall knowledge of the plant's EP program. Step 12 also addressed the training of EP staff on relevant regulatory requirements and guidance documents.

The inspector reviewed the current (December 2003) revision of Emergency Preparedness Maintenance Procedure (EPMP) 1.0, which adequately described the processes of creating, revising, discontinuing, and maintaining the database of "call-ups" that addressed the spectrum of periodic tasks that the plant's EP staff had the lead responsibility for performing. The inspector reviewed the February 2005 revision of the "Matrix of EP Call-ups," which indicated that a primary and one or more alternate EP staffers were assigned to each "call-up" task. The inspector also reviewed a sample of call-up forms to verify their consistency with information in the aforementioned matrix. The inspector noted that a Procedure Change Request (PCR) was initiated in February 2005 to reference the CAL commitment in the next revision of EPMP 1.0. The inspector concluded that completion of this PCR should better ensure that the importance of maintaining this CAL commitment would not be forgotten over time.

The inspector reviewed Revision 13 of EPMP 3.2 and noted that its scope was expanded to include the plant's EP staff in addition to the plant's Emergency Response Organization (ERO) and offsite organizations having support agreements with the licensee. Revision 13 also included provisions for the licensee's EP Advisory



Committee to support the EP Manager in assessing the EP staff's training needs. Appendix A to this EPMP adequately addressed EP staff's training on such topics as the following: EP regulatory requirements and guidance; plant-specific EP program documents; tours of licensee, State, and county emergency response facilities; observation of various types of drills; and training on the plant's Corrective Action Program (CAP). Appendix B of EPMP 3.2 adequately addressed EP staff reviews of relevant industry "white papers" and operating experience, attendance at regional or national EP seminars and workshops, and potential EP drill or exercise observation opportunities at other plants. The time goals associated with the various categories of training listed in Appendices A and B seemed reasonable. The inspector also noted that a PCR was initiated in February 2005 to add reference to the CAL commitment in the next revision of EPMP 3.2. The inspector reviewed a sample of EP staff members' "qualification cards" associated with these appendices and concluded that the EP staff had completed more training items than had been forecast.

The inspector noted that the licensee had recognized that Steps 14 and 15, which were specified in the CAL, of Action Plan OP-09-001 were essentially redundant. As a result, Step 14 was closed and Step 15 was retained. Step 15 was the completion of an effectiveness review report. Completed licensee actions associated with Step 15 will be inspected in a future inspection.

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

a. Inspection Scope

The inspector reviewed records and discussed the licensee's actions associated with Steps 12 and 13 of this Action Plan. Only the latter step was specified in the CAL.

b. Implementation of Action Plan Steps

The inspector reviewed the three revisions of Procedure NP 1.8.3, which was titled, "10 CFR 50.54(q) Evaluations," for conducting required 50.54(q) evaluations of proposed changes to the Emergency Plan and the Emergency Plan Implementing Procedures (EPIP) to determine if a proposed change would decrease the effectiveness of the licensee's emergency plan. As summarized in IR 05000266/2004007; 05000301/2004007, the inspectors identified concerns during the 2004 special EP inspection with the adequacy of a sample of the licensee's 50.54(q) evaluations performed using Revision 1 or 2 of this site-specific procedure and associated Form PBF-1301 titled, "10 CFR 50.54(q) Evaluation Checklist." The licensee initiated CAP059392 during the 2004 special inspection to address the inspectors' concerns.

Step 12 involved the adoption of an NMC fleet-wide procedure at the Point Beach Plant for performing required pre-implementation 50.54(q) reviews of planned changes to Emergency Plan and EPIPs. The inspector verified that this fleet-wide procedure became the current Revision 3 to NP 1.8.3 and its associated checklist. The licensee indicated that a revision to the fleet-wide 50.54(q) procedure for performing 50.54(q) evaluations was expected to be issued within 60 days of this inspection, which would result in another revision of NP 1.8.3 at the Point Beach Plant. This fleet-wide

procedure revision was expected to address the additional NRC guidance on performing 50.54(q) reviews that became available in February 2005 as Regulatory Information Summary (RIS) 2005-02 titled, "Clarifying the Process for Making Emergency Plan Changes." The inspector concluded that the Point Beach staff's implementation of the fleet-wide 50.54(q) procedure as Revision 3 to NP 1.8.3 completed the action associated with Step 12 of Action Plan OP-09-003. The inspector had no further questions on Step 12 and was satisfied that the CAP process was adequately in use to address the upcoming revision of the fleet-wide 50.54(q) procedure and its adoption as another revision of NP 1.8.3 at the Point Beach Plant.

The inspector reviewed and discussed licensee actions resulting from CAP059392. The inspector determined that NRC's concerns during the 2004 special inspection on the quality of the 50.54(q) evaluations performed using Revision 1 or 2 of NP 1.8.3 was discussed during a quarterly conference call involving members of the corporate EP staff and the EP Managers of NMC's six sites. Based on review of Condition Evaluation (CE) 014659 and Revisions 1 and 2 of NP 1.8.3, the inspector concluded that Revisions 1 and 2 only required that the technical bases of a non-administrative change to the Emergency Plan or an EPIP would have only needed to be documented in the licensee's 50.54(q) evaluation records if the EP staff concluded that the change was a decrease in the Emergency Plan's effectiveness that would warrant NRC's pre-implementation review and approval.

Step 13 of Action Plan OP-09-003 was specified in the CAL and required the completion of an Effectiveness Review report. The inspector determined that a sample of the licensee's 50.54(q) evaluations performed using Revision 3 of NP 1.8.3 should be inspected for adequacy in addition to assessing the adequacy of the licensee's Effectiveness Review report. These tasks will be completed during a future EP inspection.

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

a. Inspection Scope

The inspector reviewed and discussed records associated with Steps 7 through 11 of this Action Plan, which were specified in the CAL. These steps were associated with the licensee's June 2004 submittal of its proposed EAL scheme change for pre-implementation review and approval by NRC Headquarters staff. The inspector also reviewed and discussed records of Steps 7A through 11A, which were not specified in the CAL. Steps 7A through 11A were associated with the licensee's re-submittal of its proposed EAL scheme change in October 2004.

b. Implementation of Action Plan Steps

The inspector determined that the licensee adequately completed Steps 7 through 11, as well as Steps 7A through 11A, of Action Plan OP-09-004 and had no further questions on these 10 completed steps.

The inspector verified that Steps 7 through 11 were completed. These steps encompassed the following tasks. First, the licensee drafted site-specific EALs based on its interpretations of the following documents: NRC-endorsed Nuclear Energy Institute (NEI) 99-01, Revision 4, and RIS 2003-18, "Use of NEI 99-01 Methodology for Development of Emergency Action Levels," Revision 4, dated January 2003. Second, the Plant Operations Review Committee (PORC) reviewed the proposed EAL scheme change. Review of the proposed scheme change was then requested and obtained from representatives of the two relevant State agencies and Emergency Management Agency staffs of Manitowoc County and Kewaunee County, which were the two counties in the Point Beach Plant's plume pathway Emergency Planning Zone. Step 11 was the June 2004 submittal of the proposed EAL scheme change and supporting technical bases information for NRC's pre-implementation review and approval.

As a result of NRC staff's concerns on the quality of the licensee's June 2004 submittal, a Public Meeting was held at NRC Headquarters in September 2004 to discuss these concerns. As a result, the licensee worked to re-submit its proposed EAL scheme change and supporting information, which also meant that Action Plan Step 7 through Step 11 essentially had to be re-done as corresponding Steps 7A through 11A. The licensee's re-submittal was also expected to address the criteria of Supplement 1 to RIS 2003-18, which provided clarifications on several technical positions and NRC's expectations on the content of proposed EAL scheme change submittals. The inspector verified that Steps 7A through 10A were completed prior to the re-submittal of the proposed EAL scheme change for NRC review and approval. This re-submittal was Step 11A of Action Plan OP-09-004 and was completed in mid-October 2004. Based on records reviews and discussions with licensee EP staff and NRC Headquarters staff during this special inspection, the inspector verified that the process of the licensee responding to NRC questions on its October 2004 re-submittal was well underway.

Steps 12 and 13, which were specified in the CAL, of Action Plan OP-09-004 remained to be reviewed by the licensee's Excellence and Independent Review Teams. Step 12 involved completion of the training of relevant licensee personnel on the NRC-approved EAL scheme change. Step 13 involved obtaining the PORC's approval of EPIP and Emergency Plan revisions that contained the NRC-approved EAL scheme change. Licensee actions associated with Steps 12 and 13 will be inspected in a future inspection following the Excellence Team's and IRT's reviews of these actions.

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

a. Inspection Scope

The inspector reviewed and discussed records associated with Steps 5 through 12, which were specified in the CAL, of this Action Plan. The inspector also reviewed and discussed records associated with Steps 5A, 6A, and 11A that were not specified in the CAL but were outgrowths of Steps 5, 6, and 11, respectively.

b. Implementation of Action Plan Steps

The inspector determined that the licensee adequately completed Steps 5 through 12, as well as Steps 5A, 6A, and 11A, of Action Plan OP-09-005 and had no further questions on these completed steps.

As indicated in IR 05000266/2004007; 05000301/2004007, the licensee developed a matrix of plant equipment associated with its Emergency Plan as the beginning steps of Action Plan OP-09-005. Step 5 involved the licensee evaluating each item in the EP equipment matrix to determine whether the equipment met the functional requirements and commitments contained in the Emergency Plan. The licensee initially determined that the following items listed in its EP equipment matrix did not appear to meet the Emergency Plan's functional requirements: seismic event indicators SEI-06210 through SEI-06213; and approximately 39 channels of the Radiation Monitoring System (RMS).

Based on review and discussion of CAP documents, the inspector determined that the licensee created Action Plan Step 5A to focus on the aforementioned radiation monitoring equipment, since Modification Package MR03-063 already existed for a project to upgrade the plant's seismic event instrumentation. The inspector understood that the Plant Health Committee was expected to decide on 2006 funding of the next stage of the seismic monitoring system upgrade project. Pending the completion of MR03-063, the inspector understood that a temporary modification had been installed to provide an alarm in the Control Room if one of the two operable seismic monitors indicated that a seismic event had occurred. An on-shift technician would then be deployed to obtain a local readout of the seismic event's magnitude using a portable device.

Records associated with Step 5 and/or Step 5A indicated that EP, Engineering, and Regulatory Affairs staffs interacted during the second half of calendar year 2004 to re-assess whether the aforementioned RMS channels should be associated with Emergency Plan commitments and whether the installed instrumentation met these commitments. Based on further assessments, licensee staff concluded that all of the radiation monitoring instruments of initial concern were being maintained and were relevant to the Emergency Plan, including a number of liquid effluent monitors. The licensee also concluded that its RMS instrumentation collectively met relevant functional requirements and commitments, although some individual monitors could not measure the complete range of radiation levels specified in Regulatory Guide 1.97 or Nuclear Regulatory Guide (NUREG) 0737. As a result, the licensee concluded that the radiation monitors of initial concern should remain listed in Section 7 of the Emergency Plan. The inspector verified that these monitors were listed in Table 7-1 of (current) Revision 48 of Section 7 of the Emergency Plan.

Step 6 involved the licensee assessing each item listed in the EP equipment matrix for reliability, maintainability, and obsolescence. In addition to the four seismic event monitors, the licensee initially identified reliability, maintainability, and/or obsolescence concerns with the following Emergency Plan-related equipment: the WeEnergies microwave communications system; the meteorological monitoring system, portions of the fire protection system; and the plant process computer system.

Action Plan Step 6A was created to focus on the microwave communications system. The licensee's overall conclusion was that the microwave communication system remained needed as one of the systems available for emergency communications purposes. A Condition Evaluation (CE) indicated that WeEnergies Information Technology (IT) staff determined that the microwave communications equipment remained maintainable. Records also indicated that EP and plant IT staffs worked together to compile information on the uses and capabilities of this microwave system. The licensee identified that, although a protocol was in-place by September 2003 that addressed expected coordination between WeEnergies and plant IT staffs, the former staff did make some change(s) to the microwave communications system without notifying plant IT staff. As a result, a corrective action was initiated in September 2004 to improve the coordination between WeEnergies and plant IT staff prior to implementing further changes to the microwave communications equipment.

As indicated in IR 05000266/2004007; 05000301/2004007, the meteorological monitoring system upgrade project's study phase was completed in February 2004. This upgrade would include replacement of the systems' three towers, associated instrumentation, signal processing equipment, and, as needed, signal transmission equipment. Review of the monthly project status report for May 2005 indicated that contracts and purchase orders for the three replacement towers and the meteorological instrumentation and signal processing and transmission equipment were issued in March 2005. An installation work plan was being developed and was expected to be issued for internal comment in July 2005. Planning included provisions for instrumentation acceptance testing and for training of relevant Instrument and Controls technicians and engineering staffs. Installation of the three replacement towers and replacement instrumentation and signal processing and transmission equipment was expected to be completed by late September 2005. The inspector concluded that the licensee was making good progress on completing this system upgrade project.

Records and discussion indicated that the project to upgrade portions of the fire protection system was assigned a lower priority in about Fall 2001. The inspector understood that a request for study phase funding of this postponed project was expected to be submitted to plant management later in 2005. Records also indicated that the licensee's further evaluation of its plant process computer system was that this system was roughly two years old and was reliable and maintainable.

Steps 7 and 8 of Action Plan OP-09-005 involved the EP staff assessing the adequacy of preventive maintenance "call-ups" for each item listed in the EP equipment matrix and then revising and/or generating new "call-ups", as needed. In June 2004, the EP staff concluded that adequate "call-ups" and preventive maintenance procedures were in place and in use for all items listed in the EP equipment matrix with the exception of the four seismic event monitors SEI-06210 through SEI-06213.

Two preventive maintenance "call-up" procedures were associated with each of the four seismic event monitors. Call-up procedure PBO-1 was a semi-annual functional test procedure, which was performed by licensee technicians. This procedure was used to determine whether the seismic instrumentation was functional and within calibration. Procedure PBO-2 was an annual calibration procedure that apparently had been

performed by a vendor, but was to be performed by licensee technicians after the vendor went out of business.

The inspector noted that a CAP document was generated to ensure that the call-up for procedure PBO-2 was revised to indicate that licensee technicians needed to perform this annual calibration. Other CAP documents addressed the needs for EP staff to coordinate with systems engineering and maintenance staffs to ensure that procedures PBO-1 and PBO-2 would be performed on seismic monitors SEI-06210 and SEI-06211 once they were returned to service.

Review of preventive maintenance call-ups and Work Order (WO) records for seismic event monitors SEI-06212 and SEI-06213 indicated that SEI-06213 was calibrated in October 2004, while SEI-06212 was calibrated in March 2005. Other WOs indicated that both seismic monitors were functionally tested per procedure PBO-1 in January 2005.

Records indicated that Form PBF-2068g, "Status of an RMS Channel Not in Service," was in use for some years. In 2004, the licensee decided to create a separate PBF-2068g form for each RMS channel. Step 9 of Action Plan OP-09-005 involved further revision of these channel-specific forms to indicate whether an RMS channel was relevant to one or more EALs and to include provisions for notifying the EP staff when an EAL-related channel became out of service. The latter change was analogous to existing provisions on the form for notifying chemistry or radiation protection staff if a relevant RMS channel became out of service. The inspector reviewed a sample of the revised, channel-specific PBF-2068g forms and verified that those listing one or more EALs also had provisions for notifying EP staff. Records dated October 2004 indicated that the licensee planned to further revise the PBF-2068g forms in response to Excellence Team's comments by adding provisions to notify EP staff when a relevant RMS channel was returned to service and to notify Regulatory Affairs staff, who would determine whether an out of service RMS channel might be reportable.

Step 10 involved revising the Radiation Monitoring System Alarm and Response Book (RMSASRB) procedure(s) that were related to items listed in the EP equipment matrix. The inspector reviewed Revisions 8, 10, and 11 of relevant procedure RMSASRB 2.0. Revision 10 included references to the channel-specific PBF-2068g forms and Step 10 of Action Plan OP-09-005. Revision 10 also indicated that EP staff were to be notified if an RMS channel relevant to the Emergency Plan went out of service. Revision 11 included a clarification that Step 10 of this Action Plan was specified in the CAL.

Step 11 involved assessing whether a new procedure was needed to address equipment listed on the EP equipment matrix that was not adequately addressed either by equipment preventive maintenance program "call-ups" or by the revised PBF-2068g forms. The inspector reviewed and EPMP 1.0, "Maintaining Emergency Preparedness Commitments and Surveillance Tests," which included adequate instructions for creating, revising, discontinuing, and maintaining EP Program "call-ups." This EPMP also included a multi-page listing of onsite and off-site program commitments, periodic communications equipment tests, and emergency supplies periodic inventories. Based on actions completed for earlier steps of Action Plan OP-09-005 and the scope of periodic tasks and commitments listed in EPMP 1.0, the inspector concluded that the

licensee had made a reasonable determination that a new procedure would not be needed to redundantly address items listed in the EP equipment matrix.

Step 11A was added to Action Plan OP-09-005 to establish provisions for maintaining the EP equipment matrix. Review of CAP documents indicated that the licensee recognized the needs to review and update, as needed, the equipment matrix and the channel-specific PBF-2068g forms following NRC approval of the EAL scheme change. Another "call-up" was associated with EPMP 1.0 to conduct an annual review of the EP equipment matrix. Based on a discussion with the EP Manager and review of CAP records, the inspector understood that the licensee planned to add the EP equipment matrix as another appendix to its Emergency Plan to further highlight the importance of the listed equipment in maintaining Emergency Plan commitments.

Step 12 involved performing an effectiveness review of actions completed for the previous steps of Action Plan OP-09-005. This review was performed in early April 2005 by one member of the licensee's EP staff and EP specialists from two other nuclear power facilities. Their report was approved by the EP Manager on June 20, 2005. The inspector reviewed and discussed the effectiveness review report and concluded that it adequately addressed the problem statement and causal factors associated with Action Plan OP-09-005. The inspector did not identify any inconsistencies between the report's statements and the completed actions associated with previous steps of this Action Plan, including those steps that included the development and implementation of measures to sustain the corrective actions taken.

1. Exit Meeting

On July 1, 2005, the inspector presented the preliminary inspection results of the inspection to Mr. D. Koehl and other members of management and staff. The licensee acknowledged the results and did not identify any information as proprietary

ATTACHMENT: SUPPLEMENTAL INFORMATION

## SUPPLEMENTAL INFORMATION

### KEY POINTS OF CONTACT

#### Licensee

D. Koehl, Site Vice President  
J. McCarthy, Director of Site Operations  
A. Capristo, Regulatory Affairs Manager  
T. Carter, Engineering Systems Manager  
S. Cassidy, Communications Manager  
F. Forrest, Nuclear Oversight Manager  
T. Gemske, EP Supervisor  
J. Helbing, Instrument and Control General Manager  
M. Lorek, Plant Manager  
R. Milner, Business Manager  
M. Ray, EP Manager  
L. Schofield, Senior Regulatory Compliance Engineer  
D. Schuelke, Radiation Protection Manager  
M. Vonk, Senior EP Specialist, NMC

#### Nuclear Regulatory Commission

M. Morris, Resident Inspector  
P. Loudon, Chief, Reactor Projects Branch 5, 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. Background

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

2. Review of Completed Steps of the Four Remaining EP Action Plans

Point Beach Nuclear Plant Excellence Plan; Action Plans OP-09-001, OP-09-003, OP-09-004, and OP-09-005; Revision 6

Excellence Plan Action Steps Closure Reports; Action Plan OP-09-001; Steps 11 and 12

Excellence Plan Action Step Closure Report; Action Plan OP-09-003; Step 13



Excellence Plan Action Steps Closure Reports; Action Plan OP-09-004; Steps 7 through 11

Excellence Plan Action Steps Closure Reports; Action Plan OP-09-004; Steps 7A through 11A

Excellence Plan Action Steps Closure Reports; Action Plan OP-09-005; Steps 5 through 12

Excellence Plan Action Steps Closure Reports; Action Plan OP-09-005; Steps 5A, 6A, and 11A

EPMP 1.0; Maintaining Emergency Preparedness Commitments and Surveillance Tests; Revision 0; dated December 12, 2003

EPMP 3.2; Offsite Personnel and Emergency Preparedness Staff Training; Revision 13; dated February 11, 2005

Matrix of EP Call-ups; dated February 2, 2005

PCR018083; Add Reference to the CAL Commitment to EPMP 1.0; dated February 14, 2005

PCR018295; Add Reference to the CAL Commitment to EPMP 3.2; dated February 21, 2005

Sample of Current Revisions of 20 EP Call-ups

Matrix of Primary and Back-up Assignments for EP Call-ups; dated May 12, 2005

Sample of EP Staff's "Qualification Cards" Indicating Status of Completing Training Items Listed in EPMP 3.2

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

CAP059392; NRC Concerns During September 2004 Inspection on Inadequate Level of Detail in 50.54(q) Evaluations Performed Before Implementation of Fleet-wide 50.54(q) Procedure; dated September 22, 2004

CE014659; Perform a Condition Evaluation per NP 5.3.1 on NRC Concerns on Level of Detail in 50.54(q) Evaluations

CA060146; Understandings of NRC Expectations for 50.54(q) Evaluations; dated October 25, 2004

Internal Correspondence; IRT Review Team Meeting 1 Results; dated June 21, 2004

Internal Correspondence; IRT Review Team Meeting 11A Results; dated June 29, 2005

PORC Meeting Minutes; dated May 10, 2004

Letters Requesting Reviews of Proposed EAL Scheme Change Issued by Licensee to Officials from Two State Agencies and Two Counties' Agencies; dated May 18, 2004

Letters Acknowledging Reviews of Proposed EAL Scheme Change Received from Officials of Two State Agencies and Two Counties' Agencies; dated between May 26 and June 7, 2004

Letter to NRC with Enclosures; Proposed Emergency Plan and Emergency Plan Implementing Procedure Changes Upgrading EALs to NEI 99-01; Revision 4; dated June 24, 2004

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

Emergency Plan Appendix B; Emergency Classification; Draft Revision 22

EPIP 1.2; Emergency Classification; Draft Revision 45

EPIP 1.2.1; EALs Technical Basis; Draft Revision 0

Letters Requesting Reviews of Proposed EAL Scheme Change Sent by Licensee to Officials from Two State Agencies and Two Counties' Agencies; dated October 1, 2004

Letters Acknowledging Reviews of Proposed EAL Scheme Change Received from Officials of Two State Agencies and Two Counties' Agencies; dated between October 12 and 15, 2004

PORC Meeting Minutes; dated October 14, 2004

Letter to NRC with Enclosures; Revision to Emergency Action Levels; dated October 15, 2004

Letter to NRC with Enclosures; Proposed Emergency Plan Changes Related to Emergency Action Levels Upgrade to NEI 99-01, Revision 4, and Response to Request for Additional Information; dated April 30, 2005

Letter to NRC with Enclosures; Proposed Emergency Plan Changes Related to Emergency Action Levels Upgrade to NEI 99-01; Revision 4, and Response to Second Request for Additional Information; dated June 3, 2005

PORC Meeting Minutes; dated June 2, 2005

Internal Correspondence; OP-09-005, Step 5; dated June 7, 2004

Matrix of EP-related Equipment for OP-09-005; dated June 7, 2004

CAP057242; Some EP Equipment Does Not Meet Functional Requirements; dated June 7, 2004

CAP057244; List of EP Equipment Initially Determined to Be Obsolete, Unreliable, or Not Maintainable

CE014162; Evaluation of EP Equipment Apparently Not Meeting Functional Requirements; dated June 9, 2004

CE014163; Evaluation of EP Equipment Initially Determined to Be Obsolete, Unreliable, or Not Maintainable

CA058300; Some EP Equipment Does Not Meet Functional Requirements; dated July 2, 2004

CA059177; Some EP Equipment Does Not Meet Functional Requirements; dated August 28, 2004

Emergency Plan; Table 7-1; Emergency Facilities and Equipment; Revision 48; dated October 27, 2004

Matrix of EP-related Equipment for OP-09-005; dated March 25, 2005

CAP061261; Update EP Equipment Matrix after Completion of OP-09-005 Steps 1 through 10; dated January 18, 2005

CAP062751; Determine If Another Procedure Is Needed on Use of the EP Equipment Matrix; dated March 15, 2005

CAP065214; EP Equipment Matrix Needs to Be Updated Following NRC Approval of the EAL Scheme Change; dated June 20, 2005

EP Call-up A126-01; Review EP Equipment Matrix Annually

Internal Correspondence; Protocol for Telecommunications and Pager Infrastructure Changes; dated August 4, 2003

CA058315; Improve Coordination Between WeEnergies and Plant Information Technology Staffs on Communications Equipment Changes; dated July 2, 2004

CA058252; EP and Information Technology Staffs to Determine Need of WeEnergies Microwave Communications System; dated June 29, 2004

Internal Correspondence; OP-09-005, Step 6A; Need for WeEnergies Microwave Communications System; dated February 18, 2005

Internal Correspondence; Evaluation of Adequacy of Preventive Maintenance Procedures for Equipment in the EP Equipment Matrix; dated June 7, 2004

CAP057246; Seismic Monitors' Preventive Maintenance Procedures Determined to Be Inadequate; dated June 7, 2004

Preventive Maintenance Call-up Forms for Seismic Indicators SEI-06210 through SEI-06213

WO 0414718; Calibrate SEI-061213; dated October 28, 2004

WO 0414720; Calibrate SEI-061212; dated March 29, 2005

Two Preventive Maintenance Call-up Forms Six Month Functional Tests of SEI-06212 and SEI-06213

WO 0400871; Perform Six-Month Functional Test of SEI-06212; dated January 12, 2005

WO 0400872; Perform Six-Month Functional Test of SEI-06213; dated January 12, 2005

CA054424; Complete Design Package for Modification MR 03-063 to Replace Seismic Monitors; dated December 15, 2003

OTH015409; EP and Maintenance Staffs to Ensure that Preventive Maintenance Call-ups for Functional Tests and Calibrations Are Retained for Seismic Indicators SEI-06210 and SEI-06211 When They Are Returned to Service; dated December 13, 2004

OTH015410; EP and System Engineering Staffs to Ensure that Preventive Maintenance Call-ups for Functional Tests and Calibrations Are Retained for SEI-06210 and SEI-06211 When They Are Returned to Service; dated December 13, 2004

Meteorological Towers Upgrade Project Monthly Status Report for May 2005; dated June 9, 2005

Sample of 10 Channel-specific Form PBF-2068g; Status of an RMS Channel Not in Service

CA052419; Revise RMS Form PBF-2068g to Include a Statement Indicating Whether the Channel is Relevant to One or More EAL and to Notify Ep Staff of That Determination; dated September 17, 2003

CAP059731; Revise Channel-specific PBF-2068g Forms to Address the Following Excellence Team Comments: (1) Notify EP Staff When a Relevant RMS Channel is Returned to Service; and (2) Notify Regulatory Affairs Staff of an Out of Service Channel So That Reportability Can Be Assessed; dated October 6, 2004

RMSASRB 2.0; Response Guidelines for Non-routine RMS Situations; Revisions 8, 10, and 11

Sixteen ARB Procedures for Control Room Operator Response to Specified Annunciators; dated October 28, 2004

OTH060474; Revise RMSASRB 2.0 per an Excellence Team Comment on the Need to Improve Sustainability; dated November 16, 2004

Effectiveness Review Report 52422 of Actions Taken per Action Plan OP-09-005; Conducted on April 4 through 7, 2005; dated June 20, 2005

CA063556; Add the EP Equipment Matrix as an Appendix to the Emergency Plan; dated June 30, 2005

## LIST OF ACRONYMS USED

ADAMS	Agency Wide Access Management System
ARB	Alarm Response Book
CA	Corrective Action
CAL	Confirmatory Action Letter
CAP	Corrective Action Program (Document)
CE	Condition Evaluation
CFR	Code of Federal Regulations
EAL	Emergency Action Level
EP	Emergency Preparedness
EPIP	Emergency Plan Implementing Procedure
EPMP	Emergency Plan Maintenance Procedure
ERO	Emergency Response Organization
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	Inspection Report
IRT	Independent Review Team
IT	Information Technology
NEI	Nuclear Energy Institute
NMC	Nuclear Management Company, LLC
NP	Nuclear Plant Administrative Procedure
NRC	U. S. Nuclear Regulatory Commission
NUREG	Nuclear Regulatory Guide
OTH	Other (category of corrective action)
PBNP	Point Beach Nuclear Plant
PCR	Procedure Change Request
PORC	Plant Operations Review Committee
RIS	Regulatory Information Summary
RMS	Radiation Monitoring System
RMSASRB	Radiation Monitoring System Alarm and Response Book
SDP	Significance Determination Process
SEI	Seismic Event Indicator
WO	Work Order