

WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

July 14, 1976

U. S. Nuclear Regulatory Commission  
Office of Inspection & Enforcement  
Region III  
799 Roosevelt Rd  
Glen Ellyn, IL 60137

ATTN: Mr. James G. Keppler  
Operating License DPR-43  
Letter to Wisconsin Public Service from  
Mr. J. G. Keppler dated June 10, 1976

The referenced letter requested our comments on the implementation of the resident inspection program. The following comments are being provided per your request.

The Trial Resident Inspection Program implemented for the last two years at the Kewaunee Plant was a superior method of performing inspections. During initial plant startup and first cycle operation the program was particularly beneficial in providing rapid resolution of questions in regard to conformance. The continuous contact with plant personnel, awareness of specific problem areas confronting the operating staff, and the familiarity with the physical plant, which resulted from frequent inspection visits allowed the inspections to occur constructively and with a minimum of disruption of normal plant activities. The program, as it was implemented by the inspector, provided a flexible inspection schedule whereby the inspector was able to perform his inspections so as to not interfere with the immediate duties of plant personnel during unit outages or other high activity periods. While not a major problem, we do consider the minimization of interferences with the performance of the staff duties to answer questions of an inspector, who is on a limited schedule, to be of considerable value. We have been very pleased that such interferences have not occurred in the Resident Inspection Program.

We believe that the success of the Resident Inspection Program from this licensee's viewpoint is due to the performance and qualifications of the inspector. There is no substitute for the practical operational knowledge and comprehension of the technology by an inspector. Mr. Boyd, due to his ability and performance, made the Trial Resident Inspection Program function in the fine manner we have experienced in the last two years.

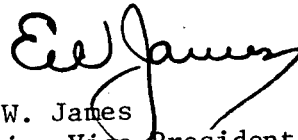
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The main reservation we have in regard to the Resident Inspection Program is that its effectiveness and acceptability to a licensee will be directly related to the assigned inspector's qualifications. If the inspectors in a future Resident Inspection Program are selected according to a strict standard which requires previous operational experience and broad based knowledge of operating plant activities, the program should be advantageous to both the NRC and the Licensees; however, if such Resident Inspectors are not qualified by previous extensive experience in operating facilities, the program will be ineffective and burdensome to the extent that we will request not to be involved.

Frankly, and in summary, as the Trial Resident Inspection Program did function well at Kewaunee, we reluctantly see it terminated.

Very truly yours,



E. W. James  
Senior Vice President  
Power Supply & Engineering

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