

Docket No. 50-305

MAR 9 1977

Wisconsin Public Service Corporation
ATTN: Mr. E. W. James
Senior Vice President
Post Office Box 1200
Green Bay, Wisconsin 54305

Gentlemen:

RE: KEWAUNEE NUCLEAR POWER PLANT

As you may be aware, the provision for "an individual qualified in radiation protection procedures to be on site when fuel is in the reactor" has been a technical specification requirement for the majority of operating facilities for the past several years. The intent of this requirement was to provide at least a minimum level of expertise in radiological protection at the operating shift crew level. It was intended that these radiation protection personnel would perform routine radiation monitoring activities and thereby supplement licensee efforts to maintain radiation exposure and release of radioactive effluents "as low as is reasonably achievable".

As a result of recent NRC staff discussions, we have formalized our position regarding the necessary activities "individuals qualified in radiation protection procedures" should be able to perform. These activities and related clarifying information are presented for your information in the attached enclosure.

The OI&E Inspector assigned to your facility will be using this same criteria in determining whether your designated individuals meet these requirements. We recommend you review the enclosed criteria promptly so that you may take any action necessary to meet the requirements.

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We note that your facility technical specifications do not require that the individual performing the function of Radiation Protection Manager (RPM) meet the minimum qualification requirements of Regulatory Guide 1.8, September 1975. As stated in this guide, it is the NRC position that if the RPM is reassigned or the incumbent replaced, the new RPM should have qualifications equivalent to those stated in this guide.

To implement this provision, we request that you determine if the individual performing the function of Radiation Protection Manager meets the minimum qualifications of Regulatory Guide 1.8, September 1975. In the event the RPM is so qualified, you should propose a technical specification to be included in the Administrative Controls Section which states that "the RPM (or equivalent position title) shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975".

In the event you determine that the present incumbent does not meet the minimum requirements of the guide, you should advise us of this fact and provide a written commitment that the successor to the incumbent will be so qualified and that you will propose a technical specification to that effect at that time.

The above action should be completed within 60 days of receipt of this letter. In the event you should desire further discussion of this matter, please contact us.

Sincerely,

Original Signed By

A. Schwencer, Chief
 Operating Reactors Branch #1
 Division of Operating Reactors

Enclosure:
 Criteria for "Individuals
 Qualified in Radiation
 Protection Procedures"

cc: See next page

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cc: Steven E. Keane, Esquire
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CRITERIA FOR "INDIVIDUALS QUALIFIED
IN RADIATION PROTECTION PROCEDURES"

An individual is considered to be qualified in radiation protection procedures when a licensee certifies that each designated individual is capable of successfully accomplishing the following activities as required by federal regulations, license conditions, and facility procedures pertaining to radiation protection.

1. Conduct special and routine radiation, contamination and airborne radioactivity surveys and evaluate the results.
2. Establish protective barriers and post appropriate radiological signs.
3. Establish means of limiting exposure rates and accumulated radiation doses, including the use of protective clothing and respiratory protection equipment.
4. Perform operability checks of radiation monitors and survey meters.
5. Recommend appropriate immediate actions in the event of a radiological problem and perform necessary activities until the arrival of health physics personnel.
6. Conduct other routine radiological duties (e.g., TS surveillance items) as may be required on backshifts or weekends.