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SUBJECT: Forwards outline of compliance w/Reg Guide 1.58, Revision 1, Positions 5,6,7,8 & 10, in response to NRC 820813 ltr. Util committed to ALARA concept.

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WISCONSIN PUBLIC SERVICE CORPORATION



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

September 15, 1982

Mr. S. A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Varga:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Qualification of Test, Inspection and Examination Personnel

- References:
- 1) Letter from Mr. S. A. Varga to Mr. C. W. Giesler dated August 13, 1982.
 - 2) Letter from Mr. E. R. Mathews to Mr. D. G. Eisenhut dated August 3, 1981.
 - 3) Generic Letter 81-01 Qualification of Inspection, Examination and Testing and Audit Personnel.
 - 4) Letter from Mr. A. Schwencer to Mr. E. R. Mathews dated July 23, 1979

Reference 1 is a request to provide the revision number to ANSI N45.2.6 from which our Administrative Control Directive 9.6 (ACD 9.6) was generated. You also requested that we outline the extent to which we comply with Regulatory Guide 1.58 Revision 1, positions 5, 6, 7, 8, and 10.

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In answer to the first request, ACD 9.6 was generated using ANSI N45.2.6-1973 as the basis.

The following addresses request number two. The numbering is consistent with the regulatory positions of Regulatory Guide 1.58 Revision 1.

Position C5: Section 3.4, "Level III Personnel Capabilities," of ANSI N45.2.6-1978 specifies the capability requirements of Level III personnel. In addition, the individual should be capable of reviewing and approving inspection, examination, and testing procedures and of evaluating the adequacy of such procedures to accomplish the inspection, examination, and test objectives.

Reply: ACD9.6 states:

"Level III must be a graduate of an accredited engineering or science college or university and have five years experience in quality control of which two are associated with a nuclear facility or be a high school graduate and have ten years experience in quality control of which two are associated with a nuclear facility."

Persons who are qualified to Level III are capable of reviewing and evaluating procedures. After review, procedures are submitted to the Plant Operations Review Committee with recommendations for acceptance or rejection. The Committee then recommends approval or rejection to the Plant Manager, who has final authority. This tiered method of review and approval exceeds the requirement of the Regulatory Guide.

C6 Section 3.5, "Education and Experience-Recommendations," of ANSI N45.2.6-1978 states that the education and experience specified are recommendations and that other factors may provide reasonable assurance that a person can competently perform a particular task. The set of recommendations has been reviewed by the NRC staff and found to be acceptable with one exception. In addition to the recommendations listed under Section 3.5 for Level I, II, and III personnel, the candidate should be a high school graduate or have earned the General Education Development equivalent of a high school diploma. Since only one set of recommendations is provided for the education and experience of personnel, a commitment to comply with the regulatory positions of this guide in lieu of providing an alternative to the recommendations of the standard means that the specified education and experience recommendations of the standard will be followed.

Reply: Level I must be a high school graduate plus one year experience in quality control.

Level II must be a graduate of an accredited engineering or science college or university and have two years experience in quality control or be a high school graduate and have four years experience in quality control.

Level III qualifications are stated in response to C5.

These requirements satisfy position C6.

- C7 Section 4, "Performance," of ANSI N45.2.6-1978 states:
"When a single inspection or test requires implementation by a team or group, personnel not meeting the requirements of this Standard may be used in data-taking assignments or in plant or equipment operation provided they are supervised or overseen by a qualified individual participating in the inspection, examination, or test."
These personnel should have sufficient training to ensure an acceptable level of competence in the performance of their activities.

Reply: WPSC does comply with this requirement.

- C8 An important concept that is not addressed directly in ANSI N45.2.6-1978, ANST Recommended Practice No. SNT-TC-1A-1975, or the ASME Boiler and Pressure Vessel Code is that occupational radiation exposure should be maintained as low as is reasonably achievable (ALARA). In all cases where inspection, examination, and testing personnel may be exposed to radiation fields during their activities in restricted areas, these personnel should receive instruction in radiation protection and radiation-dose reduction considerations related to work they are expected to perform. Regulatory Guide 8.8,

"Information Relevant to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations Will Be As Low As Is Reasonably Achievable," describes techniques, features, and recommendations to maintain occupational exposure ALARA.

Reply: WPSC is committed to ALARA and no special exemptions are extended to NDT personnel.

C10 Section 2.2, "Determination of Initial Capability," and Section 2.3, "Evaluation of Performance," of ANSI N45.2.6-1978 deal with the use of evaluation of job performance and determination of initial capability to perform the job. Use of the measures outlined in these sections to establish that an individual has the required qualifications in lieu of required education and experience should result in documented objective evidence (i.e. procedures and record of written test) demonstrating that the individual indeed does have "comparable" or "equivalent" competence to that which would be gained from having the required education and experience.

Mr. S. A. Varga
September 15, 1982

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Reply: ACD 9.6 contains a data sheet to record the level of qualification, area(s) of qualification, basis for certification and period of certification. Each persons data sheet, whether a WPSC employee or not, is approved by WPSC prior to performing QC activities.

We assume the above replies are sufficient to resolve this matter.

Very truly yours,



C. W. Giesler
Vice President - Nuclear Power

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cc - Mr. Robert Nelson, NRC Sr Resident Inspector