

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8212140407 DOC. DATE: 82/12/08 NOTARIZED: NO DOCKET #
 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305
 AUTH. NAME AUTHOR AFFILIATION
 GIESLER, C.W. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Submits results of evaluation of need to provide
 around-the-clock chemistry coverage by radiological
 chemistry technologist. Commitment to provide such coverage,
 made in 810910 ltr, retracted.

DISTRIBUTION CODE: A001S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
 TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTR	ENCL		LTR	ENCL
	NRR ORB1 BC 01	7	7			
INTERNAL:	ELD/HDS3	1	0	NRR/DL DIR	1	1
	NRR/DL/ORAB	1	0	NRR/DSI/RAB	1	1
	<u>REG FILE</u> 04	1	1	RGN3	1	1
EXTERNAL:	ACRS 09	6	6	LPDR 03	1	1
	NRC PDR 02	1	1	NSIC 05	1	1
	NTIS	1	1			

TOTAL NUMBER OF COPIES REQUIRED: LTR 23 ENCL 21

WISCONSIN PUBLIC SERVICE CORPORATION



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

NRC-82-211

December 8, 1982

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Eisenhut:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Augmented Staffing for Emergencies

Reference: 1) Letter from E. R. Mathews to D. G. Eisenhut
dated September 10, 1981

Our letter of September 10, 1981, informed you of our commitment to meet the minimum staffing requirements of Table B-1 of NUREG 0654. In particular, the following commitment was made:

1 Rad Chem Technologist - will be provided by January 2, 1983. In the interim will be augmented via pager system and available within 30 minutes.

This commitment would provide around-the-clock chemistry coverage by January 2, 1983. This commitment was contingent on authorizing two additional positions, filling the positions, and training the personnel.

Since September 10, 1981, Wisconsin Public Service Corporation has re-evaluated the need to provide around-the-clock chemistry coverage. Presented below are the results from this evaluation which provided insufficient justification for around-the-clock coverage.

Acc 1

Mr. Darrell G. Eisenhut
Page 2
December 8, 1982

Background: Prior to July, 1982, the chemistry group provided coverage for the plant on the following schedule:

Monday - Friday	0800-1630
Saturday - Sunday	0800-1200 or as needed

As the chemistry staff was increased, the schedule was changed to provide additional coverage. In July, 1982, the chemistry group started providing coverage for the plant on the following schedule:

Monday - Friday	0700-2300
Saturday - Sunday	0700-1500

This reflects the schedule as it is now.

With the current schedule the productivity of the chemistry staff has improved to complement the increased demands on quality of work within the chemistry group.

Our current schedule fits well with our current work load. It would be counterproductive and against our overall company policy if we were to provide around-the-clock coverage with little or no meaningful work accomplished.

From a safety aspect, there is no requirement or need for an immediate chemistry sample to be drawn after an accident. Even if a sample were obtained immediately after an accident, the results would provide little additional information that could be of immediate aid to the control room operators in mitigating the consequences of an accident. Although, chemistry samples will be required for accident assessment, there is sufficient time to bring in a chemistry person to obtain one.

Even though an immediate chemistry sample is not required, we will comply with the NRC guidelines and ensure a chemistry person is on-site within 30 minutes to obtain a sample if need be. To ensure this staffing commitment, we have purchased and put into use an upgrade of our plant pager system. We have directed all personnel assigned pagers (including chemistry personnel) to carry it with them at all times when they are within reception range (approximately one hour from the plant), in lieu of assignment of individuals to a duty roster. Numerous unannounced tests have been conducted and, in all cases, chemistry personnel would always have been able to respond within 30 minutes; thus, these pager tests support our position for not having around-the-clock coverage.

Mr. Darrell G. Eisenhut
Page 3
December 8, 1982

Therefore, we are retracting our around-the-clock staffing commitment concerning the Rad Chem Technologist made in Reference 1, in lieu of the staffing schedule detailed in this letter.

Very truly yours,



C. W. Giesler
Vice President - Nuclear Power

kal

cc - Mr. Robert Nelson
Mr. Brian Grimes
Mr. J. G. Keppler
Mr. Jesse Pagliaro