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 GIESLER, C.W.      Wisconsin Public Service Corp.  
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 DENTON, H.R.      Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests approval of proposed change to emergency plan re first aid training requirements, clarifying Red Cross 3-yr refresher training schedule.

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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

December 22, 1982

Dr. Harold R. Denton, Director  
Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Dr. Denton:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Emergency Plan First Aid Training Clarification

This is to inform you of a change in the forthcoming update of the Kewaunee Nuclear Power Plant Emergency Plan. In our recent review of the Plan we detected an oversight regarding first aid training requirements.

Section 8, Maintaining Emergency Preparedness, Page 8-7, currently states, ". . . personnel who administer first aid receive the Red Cross Multi-Media course on an annual basis." We wish to clarify the intent of this section to avoid a potential misunderstanding. We intended to indicate that all personnel who administer first aid will receive the American Red Cross Multi-Media course. Since the Red Cross suggests a retraining schedule of three years, we have attempted to meet the training requirement by providing approximately one-third of our staff with the training each year. Hence, every three years our entire staff receives refresher training.

This training schedule is intended to meet the guidelines established in NUREG-0654, Section 0, Radiological Emergency Response Training, Item 3, which states, "Training for individuals assigned to licensee first aid teams shall include courses equivalent to Red Cross Multi-Media." The updated emergency plan will state, "...personnel who administer first aid receive the Red Cross Multi-Media course every three years."

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Although the revised wording degrades the currently implied training frequency of the Emergency Plan, the plan continues to satisfy the requirements of 10CFR50.47(b) and 10CFR50, Appendix E, Section F, as well as the guidelines of NUREG-0654 and the Red Cross Multi-Media course. In accordance with 10CFR50.54(q) we are requesting Commission approval of our proposed change, which is needed as stated earlier to clarify our intended training frequency.

We request an expeditious review and reply of this request, to facilitate our revision of the Emergency Plan which we anticipate will be submitted in January 1983.

Very truly yours,



C. W. Giesler  
Vice President - Nuclear Power

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cc: Mr. Robert Nelson, US NRC  
Mr. J. Pagliaro, US NRC  
Mr. C. F. Riederer, PSCW