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June 10, 1983

Mr. J. G. Keppler, Regional Administrator  
 Region III  
 U.S. Nuclear Regulatory Commission  
 799 Roosevelt Road  
 Glen Ellyn, IL 60137

Gentlemen:

Docket 50-305  
 Operating License DPR-43  
 Kewaunee Nuclear Power Plant  
Operational Quality Assurance Program Description

Reference: 10CFR50.54(a)(2), revised January 10, 1983, Federal Register,  
 Volume 48, NO. 6, pages 1026-1029

This letter submits the current description (Revision 3) of WPSC's Operational Quality Assurance Program, in accordance with the requirements of 10CFR50.54(a)(2). Revision 2 of this document was submitted on January 24, 1978.

Revision three incorporates many changes to the description; however, none of these changes are determined to be substantiative. Generally speaking, the revisions to the Operational Quality Assurance Program added clarification to our commitments and strengthened the program. In addition, revisions corrected typographical errors and inconsistencies in format, and also reflect the most recent titles and organization of our staff. Additionally, Section 2.3 has been revised to include an explicit reference to Regulatory Guide 1.58, August 1973, in accordance with the understanding described in the letter from A. Schwencer (US NRC) to Mr. E. R. Mathews (WPSC) dated July 23, 1979.

Please note that this reference is in accordance with our original commitment on personnel qualification. Subsequent to submittal of our original OQAP description, there was an interchange of letters between WPSC and NRC dealing with this commitment and the extent to which it did or did not comply with Regulatory Guide 1.58, Revision 1. Our letters of August 31, 1982 and September 15, 1982 did not change any of our previous commitments in this regard, but only

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Mr. J. G. Keppler  
June 10, 1983  
Page 2

clarified those commitments. During an inspection performed by the NRC at the Kewaunee Plant on June 6-8, 1983, our commitments and these letters were reviewed, and some ambiguities in terms of our actual commitments in this regard were identified. Accordingly, we intend to submit a letter of clarification on or before September 10, 1983, to resolve this confusion.

The Statements of Consideration accompanying the revision to 10CFR50.54(a) provided a discussion of the licensee's responsibility in regard to changes in contractor's or NSSS supplier's QA programs. Specifically, page 1027 of Federal Register Volume 48, No. 6 notes that "licensees... must ensure that their principal contractor's QA program description changes are reported to the NRC in writing." During discussions held at the regional meeting in Chicago on February 7, 1983, we learned that this requirement is primarily for construction and design activities, not for spare or replacement parts. It is our understanding that this reporting is not applicable if the contractor's QA program is reviewed and approved by WPSC, and if such changes do not represent a reduction in commitments to our QA program description. This is to inform you that we intend to comply with this interpretation of the reporting requirement.

Finally, at the regional meeting noted above, your representatives indicated that a clarification document would be issued based on the discussion held at all of the regional meetings. We feel that such clarification would be useful particularly for an operating plant and encourage you to publish it.

Very truly yours,



C. W. Giesler  
Vice President - Nuclear Power

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Enc.

cc - Mr. S. A. Varga, US NRC  
Mr. Robert Nelson, US NRC