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 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Lists actions implemented in response to Criterion 10 of NRC  
 820630 ltr re post-accident sampling sys (NUREG-0737, Item  
 II.B.3). Actions will ensure that operators are well trained  
 & that equipment will be available if required.

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**WISCONSIN PUBLIC SERVICE CORPORATION**


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

November 15, 1983

Director of Nuclear Reactor Regulation  
 Attention: Mr. S. A. Varga, Chief  
 Operating Reactors Branch No. 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  
Training Program for the Post-Accident Sampling System

- References:
- 1) Letter from S. A. Varga to E. R. Mathews dated June 30, 1982
  - 2) Letter from C. W. Giesler to D. G. Eisenhut dated September 14, 1982
  - 3) Letter from S. A. Varga to C. W. Giesler dated August 2, 1983

In reference 1 you provided a clarification of the requirements of NUREG-0737 Item II.B.3 Post-Accident Sampling System. Your clarification established eleven criteria that we were requested to address. Our response was submitted to you with reference 2.

In your letter dated August 2, 1983 (reference 3) you provided us with your Safety Evaluation Report. The report concluded that our proposed methods for implementing nine of the eleven criteria are acceptable.

In reference 3 you requested that we provide additional information on the following: "All equipment and procedures which are used for post-accident sampling and analysis should be calibrated or tested at a frequency which will ensure, to a high degree of reliability, that it will be available if required. Operators should receive initial and refresher training in post-accident sampling, analysis and transport. A minimum frequency for the above efforts is considered to be every six months if indicated by testing."

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In response to the requirements of criterion 10 the following have been initiated:

- 1) Procedure EP-RET-3C, Post-Accident Operation of the High Radiation Sample Room, was implemented using a test matrix similar to that suggested in reference 1. The purpose was to provide assurance that the instruments and equipment are applicable for post-accident water chemistry analyses. The results of the matrix test were evaluated and some modifications were made to the equipment and analytical techniques. The results of the test matrix analysis indicate that the instruments can be performed successfully in a post-accident chemistry environment.
- 2) The equipment and instruments used for post-accident sampling and analysis are calibrated on a weekly basis. The instruments include:
  - a) pH meter
  - b) Rexnord dissolved oxygen analyzer
  - c) YSI dissolved oxygen analyzer
  - d) Hydrogen gas chromatograph
  - e) Chloride-ion chromatograph
  - f) Containment hydrogen monitor 1A and 1B

The conductivity meter is calibrated every three months. These calibration frequencies may be revised as we gain more experience in the stability of this specific instrumentation.

- 3) The initial training program was completed in February 1983 and informal refresher training was conducted prior to our November 1, 1983 emergency planning exercise. A continuing training program is being developed which will provide periodic refresher training for the personnel required to operate the system. The formal refresher training program is expected to begin during the first quarter of 1984. The periodic training will familiarize the operators with the equipment and procedures and also provide testing of the system's hardware reliability. The intent of the training program is to provide training for personnel and also provide a test of the systems availability. Initially the training and testing will be provided at a frequency not to exceed six months. The training program will be reviewed periodically to determine whether an increase or decrease in the training frequency is required.

The periodic testing and training program will require personnel to implement EP-RET-3C during normal plant operations. WPS does not intend to use a test matrix, similar to that referenced in action 1 above, during the periodic training. Our use of a test matrix solution in initial instrument evaluation and verification was essential, but it serves no useful purpose during operator training. The weekly calibrations described in action 2 above will provide assurance of instrument accuracy. The training and testing will be documented such that any personnel or instrumentation deficiencies will be identified and resolved.

Mr. S. A. Varga  
November 15, 1983  
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The three actions stated above have been implemented in response to criterion 10 of reference 1. The purpose of these actions is to ensure that the operators are well trained and that equipment and procedures which are used for post-accident sampling and analysis will be available if required.

Very truly yours,



C. W. Giesler  
Vice President - Nuclear Power

DSN/jks

cc - Mr. Robert Nelson, US NRC