



WISCONSIN PUBLIC SERVICE CORPORATION



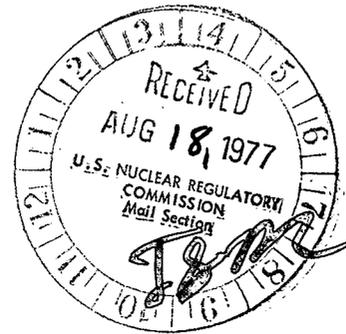
P.O. Box 1200, Green Bay, Wisconsin 54305

August 15, 1977

Regulatory

File Cy.

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



Dear Sir:

Subject: Docket 50-305  
Operating License DPR-43  
Letter from A. Schwencer, NRC, to  
E. W. James, WPS, dated March 9, 1977

The subject letter promulgated the NRC staff position regarding performance criteria for individuals qualified in radiation protection procedures. The Technical Specifications for the Kewaunee Plant require that an individual qualified in radiation protection procedures be on site when fuel is in the reactor. We concur with the criteria for qualification as presented with the following clarifications.

1. The techniques employed by the qualified individual pertain to gross activity, not isotopic evaluations.
2. The individual need not be qualified in the use of special equipment and procedures such as the multi-channel analyzer, the automatic swipe analyzer, etc., which are employed for detailed evaluations and low levels of radiation.

If special measurements and evaluations are necessary, assistance will be acquired by calling in a member of the Health Physics Staff.

The qualification requirements for the "Radiation Protection Manager" as presented in Regulatory Guide 1.8, September, 1975, were also addressed in the subject letter and it was requested that these requirements be incorporated into the Kewaunee Nuclear Power Plant Technical Specifications. We consider the requirements set forth in Regulatory Guide 1.8 to be restrictive and not necessarily indicative of assuring that the best qualified individual is assigned the position of "Radiation Protection Manager."

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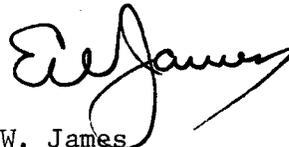
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Qualifications of individuals must be evaluated in detail to assure adequacy of education and experience. The necessity of a bachelor's degree or equivalent in a science or engineering subject does not specifically apply to the ability or competence of an individual to function as a "Radiation Protection Manager." The quality of the experience is most important; not the duration. We do not necessarily equate experience in an operating nuclear power plant to that of a test facility or processing plant, however, no distinction is made in the Guide for varying experience.

The position of the "Radiation Protection Manager" is an important staff position which should be staffed with the best qualified person. We are not convinced that agreement to a Regulatory Guide which would prevent our non-degree technical staff members being promoted to Radiation Protection Manager is consistent with staffing that position with the best qualified person.

Future appointees to the position of Health Physics Supervisor (our equivalent to Radiation Protection Manager) will be evaluated in light of Regulatory Guide 1.8, and will, as a minimum, meet or exceed the qualifications of the Health Physics Supervisor of the Kewaunee Plant at the time of issuance of the Operating License.

Very truly yours,



E. W. James  
Senior Vice President  
Power Supply & Engineering

EWJ:sna

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