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 EVERS, K.H.      Wisconsin Public Service Corp.  
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SUBJECT: Responds to NRC 900416 ltr re violations noted in Insp Rept 50-305/90-06.

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May 16, 1990

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Inspection Report 50-305/90-006 (DRSS)

Reference 1) Letter from L. Robert Greger (NRC) to K. H. Evers (WPSC) dated  
April 16, 1990.

The attachment to this letter provides our thirty-day written response to the  
Notice of Violation identified in Reference 1.

Sincerely,

K. H. Evers  
Manager - Nuclear Power

DSN/mjm

Attach.

cc - Mr. Patrick Castleman, US NRC  
US NRC, Region III

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Attachment

To

Letter from K. H. Evers (WPSC) to Document Control Desk (NRC)

Dated

May 16, 1990

Notice of Violation

As a result of the inspection conducted on March 7-15, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1989) (Enforcement Policy) the following violation was identified:

Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented and maintained that meet the requirements and recommendations of Section 5.2.2, 5.2.5, 5.2.15, and 6.3 of ANSI N18.7-1976.

Licensee written procedure, "Administrative Control Directive 6.10," requires annual respiratory retraining for all persons requiring the use of respirators.

Contrary to the above, many station and non-station employees fit tested and authorized to use respirators have not received the annual respiratory retraining for several years.

This is a Severity Level V violation (Supplement IV).

WPSC Response

Wisconsin Public Service Corporation (WPSC) acknowledges the fact that some individuals fit tested and authorized to use respirators have not received adequate annual respiratory retraining for several years. It is our practice to provide contractors who may be required to use a respirator with respiratory protection training as part of the General Employee Training-Radiation Protection (GET-RP) during the indoctrination process upon arriving on-site. WPSC employees have also typically been provided the respiratory protection training as part of initial GET-RP, however retraining on an annual basis has primarily consisted of a description of changes to the program and a respirator fit test.

WPSC will revise the respirator training program to ensure that all personnel identified as potentially having a need to wear a respirator are initially trained in respirator protection, receive a fit test prior to use, and receive annual retraining covering the same topics as the initial training course. The topics presented during the initial and refresher training courses will be consistent with the guidance provided in ANSI Z88.2-1980 Section 7.2.3.

This training program revision will ensure that all respirator wearers are provided with the necessary initial and annual refresher training. This training will cover the topics necessary to ensure that workers who may be called upon to wear respirators, but who in practice seldom wear them, will continue to maintain the skills and knowledge necessary to safely implement the respirator protection program.

We will revise the necessary procedures and directives promptly and expect implementation of the improved program by July 1, 1990.