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SUBJECT: Responds to NRC 920702 ltr re violations noted in Insp Rept 50-305/92-07 on 920309-13. Corrective actions:util allocating equivalent of three full-time engineers for operational experience assessment evaluation for remainder of 1992.

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August 10, 1992

10 CFR 2.201

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
Response to Inspection Report 50-305/92007 (DRP)

Reference: Letter to C. A. Schrock (WPSC) from R. L. Greger (NRC), dated July 2, 1992

This reference provided Wisconsin Public Service Corporation (WPSC) with the results of an on-site inspection conducted by Mr. C. E. Brown and Ms. M. L. McCormick-Barger on March 9-13, 1992, and the review of records from the recent refueling outage.

If you have any questions concerning this matter, please contact a member of my staff.
Sincerely,

C. A. Schrock

C. A. Schrock
Manager - Nuclear Engineering

KSS/kvh

Attach.

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

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PDR ADOCK 05000305
G PDR

JEOL

ATTACHMENT 1

To

Letter from C. A. Schrock (WPSC)

To

Document Control Desk (NRC)

Dated

August 10, 1992

Attachment 1
August 10, 1992
Page 1

Open Item

The inspector found the OEA program was a strength as written but had implementation weaknesses. The current backlog has existed for an excessively long time. This failure to effectively implement the program is an open item (50-305/92007-01).

Wisconsin Public Service Corporation (WPSC's) Response

To address this issue, WPSC is allocating the equivalent of three full time engineers for Operational Experience Assessment (OEA) evaluation for the remainder of 1992 and during 1993 and 1994. This commitment of additional resources actually began in April and has thus far successfully reduced the OEA evaluation backlog from the 272 noted by the inspector in March to 191 as of July 31, 1992. With this manpower allotment, it is projected that the backlog of OEA's can be decreased to an acceptable number by the end of 1993.

The inspection report also noted a concern that the backlog of OEA's awaiting evaluation could prevent timely identification of issues of potential safety significance. We believe the programmatic aspects of our OEA program (which were noted to be a strength by the inspector) are sufficient for ensuring that safety significant issues are identified and addressed in a timely manner. These programmatic controls include a screening process of incoming reports which specifically considers the safety significance of the report. If the report is identified to be safety significant, the program provides for prioritization of evaluation and disposition of the concerns.

In order to put the OEA backlog comparison used in the inspection in perspective, a trend of the OEA evaluation backlog from January, 1990 through July, 1992 was prepared (reference attachment 2). WPSC believes this trend more clearly depicts the past and present OEA evaluation status. An increase in the backlog occurred in 1991. The 1991 increase is attributed

- to:
- 1) 61 OEA's being generated in May, 1991 on the electrical/mechanical diesel generators due to technical manual updates resulting from the Vendor Technical Information Program (VTIP).
 - 2) In March 1991, the transfer of OEA evaluations from contractors to in-house engineering resulted in a loss of efficiency due to project turnover.
 - 3) The impact of the October, 1991 WPSC Nuclear department reorganization and the subsequent short term reprioritization of the newly formed Nuclear Engineering Support Group on outage modification projects for the March, 1992 refueling outage.

The positive aspects of the Nuclear department reorganization along with the OEA resource allocation increase can be observed by the reduction in the backlog since April, 1992. WPSC intends to continue committing the resources necessary to decrease the OEA backlog. We believe that the information provided in this letter and the actions taken to decrease the backlog of OEA's adequately address your concerns.

ATTACHMENT 2

To

Letter from C. A. Schrock (WPSC)

To

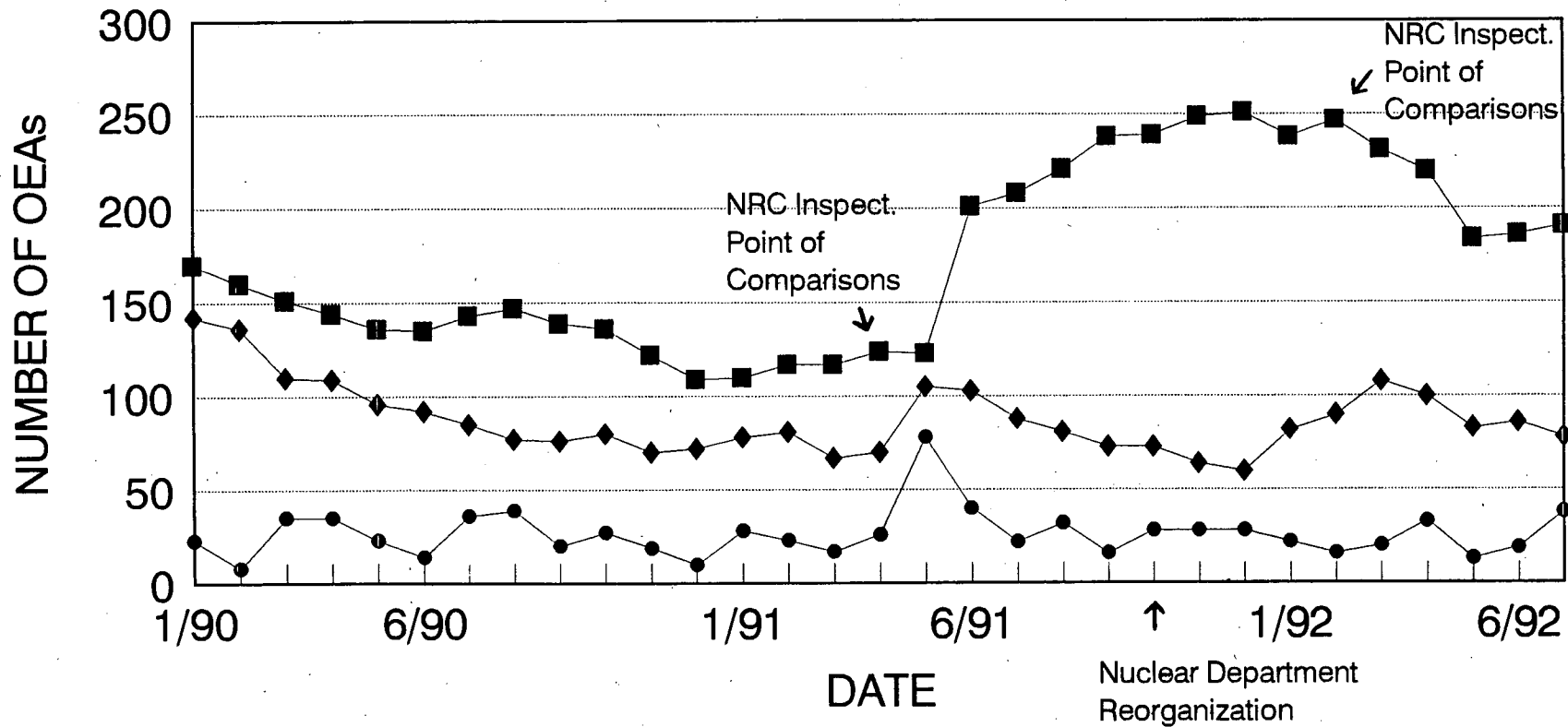
Document Control Desk (NRC)

Dated

August 10, 1992

OEA TREND DATA

JANUARY 1990 - JULY 1992



- OEAs Awaiting Evaluation
- OEAs Issued per Month
- ◆ OEAs with Incomplete Recommendations