

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

OCT 21 1975

Wisconsin Public Service Corporation

Docket No. 50-305

ATTN: Mr. E. W. James
Senior Vice President
Power Generation and
Engineering

P. O. Box 1200
Green Bay, Wisconsin 54305

Gentlemen:

Thank you for your letter dated September 16, 1975, informing us of the steps you have taken to correct the items which we identified as items of noncompliance in our letter dated August 21, 1975. We will examine these matters at a subsequent inspection.

Further discussions concerning our findings were conducted with Messrs. Luoma, Lange and Richmond of the Kewaunee Nuclear Plant on September 29, 1975 and with Mr. Stern, your Licensing Coordinator, on September 26 and October 6, 1975. It is our understanding that, based on these discussions and further evaluation by your staff, you concur with the findings of our letter and report of August 21, 1975.

Should you have any further questions concerning this inspection, we will be glad to discuss them with you. Your cooperation with us is appreciated.

Sincerely yours,

Gaston Fiorelli, Chief
Reactor Operations Branch

bcc w/ltr dtd 9/16/75:
PDR
Local PDR
NSIC
TIC

Dr

WISCONSIN PUBLIC SERVICE CORPORATION



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

September 16, 1975

U. S. Nuclear Regulatory Commission
Directorate of Regulatory Operations
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

ATTN: Mr. Gaston Fiorelli, Chief
Reactor Operations Branch

Gentlemen:

REF: Docket 50-305
Operating License DPR-43
Letter from Mr. G. Fiorelli to
Mr. E. James dated August 21, 1975

This response is submitted in answer to three apparent violations of NRC requirements indicated and identified in IE Inspection Report No. 050-305/75-13.

The items which were identified in the inspection report are addressed below by Enforcement Item.

Enforcement Item A

Contrary to the requirement of Technical Specification 6.4.a.9, the licensee did not adhere to the stipulations of Administrative Control Directive 13.2 for a monthly frequency of training meetings for the plant fire brigade, in that since January, 1974, such meetings were documented only in March and May, 1974. This deficiency was identified by the inspector.

Response

Administrative Control Directive 13.2 addresses training of the fire brigade and is titled "Fire Brigade Training." Section 6.4 of the Technical Specifications clearly relate to implementing procedures, procedures which control and direct specific actions or evaluations, i.e., unit startup, surveillance testing of safeguard components, control of radioactive releases, or notification of off site support groups as part of a response to an emergency. There is no direct interrelation between ACD 13.2 and "Emergency Plan Procedures," as specified in Section 6.4 of the Technical Specifications. We, therefore, do not consider conformance to the stipulations of ACD 13.2 required by Section 6.4

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of the Technical Specifications. We do, however, consider training of the plant fire brigade an activity which is in the interest of plant safety and an activity in keeping with our company's established safety practices.

To assure that a proper training program for the fire brigade was established an instructor from Northeast Wisconsin Technical Institute was contacted during the month of April in regards to developing such a program. During the month of May the training program outline was developed to formalize the objectives. In June a quality assurance audit noted the need to institute a formal program of fire brigade training in agreement with ACD 13.2. A contract has since been signed with the qualified instructor and this training program will begin during September, 1975.

Enforcement Item B

Contrary to the requirements of Technical Specification 6.4.a.9, the requirement of Administrative Control Directive 13.2 stipulating a quarterly frequency of training drills for members of the plant Fire Brigade was not adhered to during the period from January 1974 to the time of this inspection. Available documentation establishes the conduct of such drills only in July 1974. This deficiency was identified by the inspector.

Response

The first paragraph of the response to Enforcement Item A applies to this enforcement item also.

The instructor addressed in the response to Enforcement Item A will be involved in the planning of fire drills as part of the training activity. These drills will be held on a semi-annual interval. ACD 13.2 is being revised to reflect this interval change. Revision to ACD 13.2 will be completed by October 1, 1975.

Enforcement Item C

Contrary to the requirements of Technical Specification 6.4.a.9, the requirement of Administrative Control Directive 13.4 stipulating a monthly communications check with off-site agencies was not adhered to during the period from January 1974 to the time of this inspection. Available documentation establishes communications checks only with the office of the Kewaunee County Sheriff. This deficiency was identified by the inspector.

Response

Administrative Control Directive 13.4 entitled "Emergency Plan Training" is not an implementing procedure and in our opinion is not addressed by Section 6.4.a.9 of the Technical Specifications. (See response to Enforcement Item A above.) The Emergency Plan for the Kewaunee Nuclear Power Plant will be

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revised in the near future to agree with a revised State of Wisconsin Emergency Plan being developed by the Department of Emergency Preparedness to conform to the guidelines of WASH-1293. Until this State Emergency Plan and organization and associated local government plans are formalized, it would be improper for Wisconsin Public Service to update its Emergency Plan and impossible to perform communication checks without causing confusion during this interim updating period. During this interim period we will continue to perform the drills and training exercises noted in our Emergency Plan which in the past has verified the existence of proper communications channels to off-site governmental agencies. Only one communications problem was encountered in previous emergency drills, which was an internal government communications problem which has since been rectified.

Administrative Control Directive 13.4 is currently being revised to reflect current practices and may be revised pending the direction the State and local governments provide on communications checking activities. Revisions to Administrative Control Directive 13.4 will be completed by October 1, 1975.

The referenced letter requested information in regards to other items requiring further action. These further action items are addressed below by item number.

Further Action Items 1 & 2

- 1) Emergency Plan implementing procedures currently contain some incorrect, out-of-date, or incomplete information.
- 2) Training and orientation related to the Kewaunee Emergency Plan has not been provided to all primary off-site agency personnel whose assistance may be needed in the event of an emergency.

Response

The Kewaunee Nuclear Plant Emergency Plan and its associated implementing procedures have been undergoing revisions based on in-plant experience and critique items from the site drills and training exercises with various off-site support agencies. The interfacing with the local, state, and federal support agencies cannot be defined until the local and state emergency preparedness agencies review and revise their respective plans in light of the NRC guidance given in WASH-1293 and the recent instructional meeting in Battle Creek, Michigan. When the necessary interfaces are defined through the state and local radiological emergency response plans, the Kewaunee Emergency Plan will be revised to reflect these requirements.

We estimate that 60 days would be required to revise the Kewaunee Nuclear Power Plant Emergency Plan and associated implementing documents following definitive direction from the responsible state and local governmental agencies.

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Within 60 days our emergency plan implementing procedures will be revised to reflect the modifications necessary to remove inaccuracies discovered during the recent emergency drills.

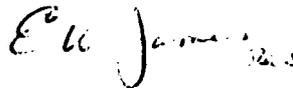
Further Action Item 3

Procedural controls do not exist for specifying and auditing a minimum availability of medical equipment and supplies in the ambulance and first aid rooms.

Response

Informal reviews of medical equipment and supplies in the ambulance and first aid rooms have been performed since plant operation commenced. This informal program has been formalized to include a monthly inventory check of the ambulance and a monthly general survey of the first aid room. This program is now in effect with the inspection and inventory current.

Very truly yours,



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

EWJ:sna

cc - Mr. Dwane Boyd, US NRC