

# WISCONSIN PUBLIC SERVICE CORPORATION

Service

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

October 24, 1980

Mr. James G. Keppler, Director  
Office of Inspection & Enforcement  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Keppler:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
IE Inspection Report 50-305/80-10

Reference: Letter from Mr. E. R. Mathews to Mr. J. G. Keppler dated  
October 10, 1980.

Responding to Item 2 of Inspection Report 80-10, we stated our interpretation of 10 CFR 50.72 item (7) in our letter of October 10, 1980. In discussions with our Resident Inspector, we understand that our response may not be acceptable. To eliminate further conflicts in this regard, we intend to adhere to the guidance provided in your supplement to Information Notice No. 80-06 issued July 29, 1980.

We would like to pursue further interpretive guidance concerning events considered reportable under Item 7 of 10 CFR 50.72. We feel the intent was not meant to include the start of a safeguards component during plant conditions which do not require that component to be operable.

We request that further interpretive guidance be provided in this matter, and that NRC reviewers responsible for 10 CFR 50.72 be informed of this request.

Very truly yours,

*E. R. Mathews*

E. R. Mathews, Vice President  
Power Supply & Engineering

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cc - Dir - Office of Inspection & Enforcement  
US NRC - Washington, D. C. 20555  
- Mr. Robert Nelson, NRC Resident Inspector  
RR #1, Box 999, Kewaunee, WI 54216

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