

WISCONSIN PUBLIC SERVICE CORPORATION



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

November 3, 1980

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

Dear Sir:

Docket No. 50-305
Operating License DPR-43
IE Inspection Report No. 80-15

- Reference (1) Letter from E. R. Mathews to R. F. Heishman dated August 20, 1980
(2) Letter from J. G. Keppler to E. R. Mathews dated October 6, 1980

This is in response to your letter, Reference (2), which states that your position concerning the apparent time of non-compliance identified in IE Inspection Report No. 80-15 remains as a non-compliance. Although we disagree in principle that this matter warrants a non-compliance, we submit the following in accordance with 10 CFR 2.201. It should be noted that your letter requested a response within 10 days. Through discussions with the resident inspector, this was relaxed to 20 days.

As was stated in our letter, Reference (1), the repairs were made under the review and direction of the Plant Operations Review Committee and the plant manager. The extent and method of repair was known. The isolation for maintenance was properly performed and the functional test verified system operability. The matter in question was our not having in place an approved procedure specifically for this repair. To preclude further problems in this area, the NRC Inspection Report and opinions and discussions therein, will be brought before plant staff involved and they will be made cognizant of the requirements for approved specific repair procedures. This action will be completed by November 10, 1980.

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We would like to take this opportunity to comment on the requests from your office to provide information on short turnaround. As you are well aware, the pressures put on our staff to respond to the multitude of concerns, not only of your department, but of the various NRC groups in Washington, force us to place priorities and work many overtime hours to comply with these requests. I'm sure you feel these pressures on your staff also, noticing the time it takes for your office to turn-around a response. We do not question your right to the information necessary to ensure full compliance with NRC regulations, but we do request that some sort of priority, in terms of safety significance, be applied in determining the time allowed for the licensee to respond.

Very truly yours,

E. R. Mathews

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

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cc - Mr. Robert Nelson, NRC Resident Inspector
RR #1, Box 999, Kewaunee, WI 54216