

## WISCONSIN PUBLIC SERVICE CORPORATION



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

February 6, 1981

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

Gentlemen:

Docket No. 50-305  
Operating License DPR-43  
Health Physics Appraisal, IE Inspection Report 80-26

The referenced report has been received and reviewed. The attachment to this letter provides our response to the Significant Appraisal Findings of the referenced report.

Very truly yours,

A handwritten signature in cursive script, appearing to read "E. R. Mathews".

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

snf

Attach.

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

Subscribed and Sworn to  
Before Me This 6th Day  
of February 1981

A handwritten signature in cursive script, appearing to read "J. J. [unclear]".  
Notary Public, State of Wisconsin

My Commission Expires

Dec. 19, 1982

ATTACHMENT

Response to Significant Appraisal Findings

1. Staffing

The station health physics staff is small and lacking in technical depth. There is no professionally trained health physicist in the company to provide technical support or a technical review of the health physics program. As a result, there is overreliance on consultants. Strong capability is needed in such areas as dosimetry, ALARA review, technician training, and emergency planning.

Additional manpower is needed to maintain the station's generally good contamination control. Prompt decontamination is possibly the most significant feature of the health physics program.

More technicians may be needed to allow for increased specialization to develop more expertise in such areas as exposure control and respiratory protection and to accommodate a stronger retraining program.

RESPONSE: In response to the overall staffing and retraining program for our health physics staff the following steps have been taken or, in fact, were previously provided for in the staff manning budget for the 1981 fiscal year prior to the health physics team appraisal:

- A radiation protection man is being transferred to the training department to provide written training/retraining requirements.
- An additional HP man has been authorized.
- A supervisory position on the plant staff to provide for radwaste control, dosimetry and ALARA review is under consideration at the corporate level.

Decontamination control is provided by plant staff janitor/ plant helpers. This group is augmented with contract personnel as needed.

- We are currently seeking a professionally trained Health Physicist for our Corporate Staff which would provide additional technical depth to our organization.

A plan to address any additional needed personnel will be developed and evaluated for the 1982 budget consistent with the corporate principles for staffing.

## 2. Respiratory Protection

The respiratory protection program needs upgrading to correct the following weaknesses:

- a. Absence of a quality control program to ensure breathability of service air,
- b. Possibility of misusing hoses connected to service air system,
- c. Allowing respirator use with beards,
- d. Inappropriate location of the respirator cleaning station, and
- e. The availability of unapproved Chemix respirators.

RESPONSE: a. A program and procedures will be developed to implement service air monitoring by April 1, 1981.

- b. This potential problem will be resolved by installing special fittings to service air hoses used for respirators and by color coding the hoses.

- c. Our current policy concerning facial hair is being revised at this time. We will institute a program which

shall not permit facial hair which intrudes into the area where a respirator seals against the face.

- d. Funds have been budgeted for the 1981-1982 construction budget year to relocate our respiratory cleaning station.
- e. Chemox respirators will be removed from use.

3. Solid Radwaste

Solid radwaste is beset with equipment breakdowns that require direct operator intervention to keep the solidification system operating. With processing of freshly spent resins, solid radwaste has become the most significant source of exposure during normal running of the plant. The operation suffers from too little management attention to ensure that equipment problems are corrected, that operational practices are appropriate and ALARA, and that adequate health physics controls are being applied.

RESPONSE: The supervisory position under the Plant Services Superintendent (see Response #1) will be directly responsible for the solid radwaste program. The radwaste operator, currently reporting to the operations department, will be transferred to this supervisor.

4. Post Accident Sampling/Monitoring

The significance of the following matters related to post-accident sampling and monitoring should be evaluated:

- a. Post-accident sampling of containment atmosphere may not be feasible at the proposed locations, particularly if the SV zone filter becomes loaded with radioactivity.
- b. There is no monitor on the shield building input to the containment vent.
- c. The auxiliary building extended range monitor reading could be affected significantly by radioactivity loading on the nearby SV zone filter.

The licensee has initiated discussion with the Office of Nuclear Reactor Regulation regarding these matters.

- RESPONSE:
- a. The containment sample point has been relocated and personnel are being trained in its use.
  - b. A design change is in progress to correct this problem. See our November 14, 1980 letter to Mr. Darrell G. Eisenhut.
  - c. Our Architect Engineer, Fluor Power Services, has evaluated this problem and developed a preliminary design to resolve it. We expect to modify the location of the monitor by March 20, 1981, as indicated in our November 14, 1980 letter referenced above.