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 TEINHARDT,C.R. Wisconsin Public Service Corp.
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SUBJECT: Responds to NRC 880713 ltr re violations noted in Insp Rept
 50-305/88-15.Corrective actions:

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October 3, 1988

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Inspection Report No. 88-015

A letter from W. D. Shafer (US NRC) to D. C. Hintz (WPSC) dated July 13, 1988 transmitted Inspection Report No. 88-015.

Though no violations of NRC requirements were identified during the course of that inspection, 4 (four) open items were cited in the inspection report. During the exit interview on June 24, 1988 WPSC agreed to respond to these open items by October 1, 1988.

The attachment to this letter contains additional information and/or clarification regarding each of these open items.

Sincerely,

C. R. Steinhardt
Manager - Nuclear Power

CSS/jms

cc - Mr. Robert Nelson, US NRC
US NRC, Region III

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Attachment to Letter from C. R. Steinhardt

Dated October 3, 1988

Open Item 88015-01

"Licensee representatives stated that they would consider the inspector's concerns, regarding lack of specificity for both secondary and primary action levels and would submit responses stating their goals to Region III on both of these by October 1, 1988."

WPSC Response

Through the awareness afforded by a relatively small staff, plant and corporate management maintain cognizance of all operational aspects, including chemistry. This cognizance permits daily involvement, if necessary, in the chemistry-related decision-making process.

WPSC/KNPP will incorporate the EPRI water chemistry guidelines Action Levels (for both primary and secondary water) in relevant plant procedures; however, the procedures will permit deviation from the specific Action Level responses when based on deliberate approval by the plant manager or his designate. Procedure revisions will be completed by January 1, 1989.

Open Item 88015-02

"The Licensee will determine the concentrations of the analytes in each of the samples and send the results to Region III for comparison with the values determined by BNL."

WPSC Response

The requested spiked sample analyses results were submitted by letter dated July 7, 1988 from W. G. Flint (WPSC) and K. H. Evers (WPSC) to R. B. Holtzman (US NRC-RIII).

Open Item 88015-03

"Progress in the implementation of ion chromatography, iron, silica, and boron analyses, will be followed in subsequent inspections..."

WPSC Response

No response required.

Open Item 88015-04

"The Licensee representatives agreed to address several of these concerns, including the implementation of bias control charts for the IC and AAS analyses and to set up a program for stocking independent control standards in the stockroom, and make access of the older control charts easier by storing them in the laboratory instead of the office. They also agreed to consider the inspector's concerns on revision of the control charts..."

WPSC Response

Four (4) specific concerns were cited in this open item. Each is addressed, in turn, as follows:

--Chemistry analyses schedules for IC (ion chromatography) and AAS (atomic absorption spectrophotometry) analyses will be revised to incorporate both precision and accuracy checks; this revision will implement the necessary bias control charts. Procedure revisions will be completed by January 1, 1989.

- Warehouse inventory control methods permit minimum stock (automatic re-order point) and re-order quantity to be specified separately. Changes to chemistry control standards inventory control have been initiated which would call for increasing the minimum in-stock quantity, while reducing the re-order quantity. This will effect a more frequent re-order of smaller quantities of control standards. This should reduce the probability of receiving identical lot number control standards.
- Previous control charts will be made available in the laboratory. Chemistry Technologists will be instructed to perform a review of older control charts when performing analyses. Procedure revisions to implement this change, are not planned at this time.
- The inspector's concerns on revision of control charts should be satisfied by making the previous (older) control charts readily accessible (i.e., in the laboratory).