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

Office of Nuclear Reactor Regulation

U. S. Nuclear Regulatory Commission Washington, D. C. 20555

ATTN: Mr. Robert A. Purple, Chief

Operating Reactors Branch #1
Division of Operating Reactors

Gentlemen:

REF: Docket 50-305

Operating License DPR-43

Letter to Wisconsin Public Service Corporation

from Mr. R. A. Purple (NRC) dated February 6, 1976

The referenced letter requested that we submit an updated description of our operational QA program for the Kewaunee Plant which describes how our operational QA program provides the controls discussed in WASH-1284, WASH-1309, and WASH-1283.

May 4, 1976

We have investigated the current developments in the area of operational QA programs since receipt of the referenced letter. This investigation indicates that ANSI N18.7 Rev. 1 which has recently been approved is the most current accepted direction for Administrative Controls and operational QA programs. It is also our understanding that Regulatory Guide 1.33 will be revised to correspond to ANSI N18.7 Rev. 1. In addition, we have been informed that the ANS-3 Standards Subcommittee has been repeatedly assured by the NRC staff that the three WASH documents referred to above will become inoperative and obsolete upon revision of Regulatory Guide 1.33 to correspond to ANSI 18.7 Rev. 1.

We intend to revise our Operational QA program to meet the intent of ANSI 18.7 Rev. 1. This revision will be performed upon receipt of ANSI 18.7 Rev. 1 and a review of our program in light of the revised standard. We estimate the effort of restating our program in accordance with the standard format to be a major undertaking encompassing a number of months to complete. Our best estimate considering the review of our present program to ANSI 18.7 Rev. 1, the adjustment to the new format of the Standard Review Plans, the evaluation of our internal review organizations and staff members is that six months would be required to complete the activity.

U. S. Nuclear Regulatory Commission Page 2 May 4, 1976

In the interim, we are now engaging a consultant organization to perform a comprehensive audit of our present QA program. It is our intent that this auditing consultant then would assist in revision of our program as needed.

We are continuing to operate with our existing program which is under continuing review by I/E inspectors for conformance to the requirement of the Regulations. These inspections indicate that the current program provides assurance of quality in the areas examined.

It is our established Corporate policy to comply with the requirements of our Operational Quality Assurance Program which was developed to assure conformance to the requirements of 10 CFR 50 Appendix B and the intent of Safety Guide 33 (Regulatory Guide 1.33).

Very truly yours,

E. W. James

Senior Vice President

Power Supply & Engineering

EWJ:sna