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 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305  
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 HINTZ, D.C. Wisconsin Public Service Corp.  
 RECIP. NAME: RECIPIENT AFFILIATION  
 THOMPSON, H.L. Division of Licensing

SUBJECT: Transmits completed surey form & provides comments on  
 integrated living schedule (ILS) per Generic Ltr 85-07.  
 Declines participation in ILS program present communication  
 between util & NRC flexible.

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**WISCONSIN PUBLIC SERVICE CORPORATION**

P.O. Box 19002, Green Bay, WI 54307-9002



July 31, 1985

Mr. H. L. Thompson Jr., Director  
 Office of Nuclear Reactor Regulation  
 Division of Licensing  
 U. S. Nuclear Regulatory Commission  
 Washington, D.C. 20555

Gentlemen:

Docket 50-305  
 Operating License DPR-43  
 Kewaunee Nuclear Power Plant  
Implementation of Integrated Schedules for  
 Plant Modifications (Generic Letter 85-07)

The above referenced letter describes the staff's intentions with respect to implementing integrated schedules and solicits participation to place the priority for modification at individual plants. It also requests that we complete the survey form included as Enclosure 2.

This letter serves to transmit our completed survey form and provides comments on the Integrated Living Schedule (ILS) concept.

The accident at Three Mile Island Unit 2 resulted in investigation which produced an array of mandated plant modifications, including implementation schedules, virtually without industry comment on the need for modification or achievability of schedular requirements. The years since the accident have proven that many schedules were not achievable due to considerations such as manpower requirements (both licensee and NRC) for design and review, unavailability of qualified equipment and suppliers, unproven technology, physical limitations and changing requirements.

In response to this widespread inability to respond to mandated schedules, NRC has changed its philosophy by allowing schedules to be negotiated with the Project Manager. See for example Generic Letter 83-28 "Required Actions Based on Generic Implementations of Salem ATWS Events."

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We feel that this approach provides the necessary flexibility to address regulatory concerns while allowing the latitude necessary to provide sound engineering procurement, installation and testing. Even when such schedules are confirmed by order, such orders usually allow schedular changes due to changing circumstances.

While we disagree with the need to confirm a licensee's response by order, we perceive this method as allowing flexibility equal to an ILS while requiring less administrative maintenance.

The ideal program for issue resolution is one in which a solution and schedule are negotiated between the interested parties and maintained or adjusted by open and frank dialogue. It is a situation in which candor and trust play equal roles. While the regulatory process has at times been adversarial we intend to keep adversity to its present low levels and to strive toward this ideal.

This informal process is workable and balanced as follows: Plant and Corporate management desire to maintain schedules in order to reduce costs and retain a favorable working relationship with NRC; the regulator has the ability to confirm progress through the inspection process and informational requests. This balance is upset when the Commission mandates deadlines which do not consider plant specific concerns.

To summarize, we agree that flexibility in regulation is a necessity which can be achieved in a variety of ways. We have chosen to decline participation in the ILS program because we feel that needed flexibility exists in the current manner in which NRC carries out its regulatory responsibilities and is maintained by candid communication between WPSC and NRC.

Very truly yours,



D. C. Hintz  
Manager - Nuclear Power

DWS:jks

cc - Mr. S. A. Varga, US NRC  
Mr. Robert Nelson, US NRC

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-

PLANT NAME: Kewaunee Nuclear Power Plant

UTILITY: Wisconsin Public Service Corporation

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS \_\_\_\_\_
- B. Have reservations that must be resolved before developing ILS \_\_\_\_\_
- C. Do not presently intend to negotiate an ILS with the staff. X \_\_\_\_\_
- D. Plan to implement an informal ILS only \_\_\_\_\_

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One:      Yes              No

If yes, select best description:

- Engineering judgement \_\_\_\_\_
- Analytic Hierarchy process \_\_\_\_\_
- Risk based analysis \_\_\_\_\_
- Cost-benefit analysis \_\_\_\_\_
- Other (please describe) \_\_\_\_\_

If no, provide estimated date for selecting a methodology: \_\_\_\_\_  
Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: \_\_\_\_\_

2. What is your estimated date for making a submittal to the NRC- \_\_\_\_\_

or

If not presently available, planned date for scheduling a submittal to the NRC \_\_\_\_\_

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

\_\_\_\_\_  
(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame \_\_\_\_\_

Phone Number \_\_\_\_\_

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One:                      Yes                      No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact David W. Sauer

Time Frame July 31, 1985

Phone Number (414)433-1315

If no, any constructive comments you have would be appreciated.

### III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.