

WISCONSIN PUBLIC SERVICE CORPORATION



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

November 23, 1977

Mr. A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

REF: Docket 50-305
Operating License DPR-43
Quality Assurance Program Description, Rev. 1

Enclosed are twenty (20) copies of our revised Quality Assurance Program Description for the Kewaunee Nuclear Power Plant. The revision incorporates those concerns expressed by the staff in the letter to Mr. E. W. James from Mr. A. Schwencer dated August 10, 1977, and also those concerns expressed via telephone conversations by members of your staff.

We understand that in order for you to make an evaluation of our Operational Quality Assurance Program you must have some basis for comparing our program. We have mutually agreed that ANSI N18.7-1976 provides that basis. You have requested that we commit to ANSI N18.7-1976, those specific standards adopted by ANSI N18.7-1976 and those specific Regulatory Guides which endorse these standards. We have agreed to these requests with particular exceptions and alternate provisions contained in Appendix A of our submittal.

Also expressed in our conversation was the mutual understanding that the daughter standards addressed in item 410.33a and b of your letter apply to maintenance and modification activities the extent of which it is the obligation of the operating quality assurance organization to make a conscientious decision to apply. A commitment to these standards and Regulatory Guides provides a foundation from which to establish and operate our quality assurance program, but does not limit or prohibit satisfying the IOCFR50 Appendix B criteria by some other means not specified in these standards. When a short term or one-time contradiction to an above commitment

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exists, a non-conformance action will be taken within the quality assurance organization to assure a conscientious effort to maintain a quality level equivalent to the safety significance of the activity involved. When a long term or permanent contradiction to an above commitment exists, a program change will be implemented and sent to the staff for review.

Very truly yours,



E. W. James
Senior Vice President
Power Supply & Engineering

EWJ:sna
Enc.

bcc - Mr. E. R. Mathews
Mr. R. A. Solboe
Mr. C. W. Giesler
Mr. C. R. Luoma
Mr. M. E. Stern
Mr. E. D. Novak

Mr. J. N. Morrison ✓
Mr. G. A. Splering
Mr. C. R. Steinhardt
Mr. R. W. Lange
Mr. J. S. Richmond