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SCHROCK, C.A.    Wisconsin Public Service Corp.  
RECIP.NAME    RECIPIENT AFFILIATION  
Region 3 (Post 820201)

SUBJECT: Provides response to violations noted in NRC Insp Rept  
50-305/93-09 on 930503-07. Corrective actions: licensed  
individual does not have to physically perform manipulation  
provided individual involved in performance of manipulation.

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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June 28, 1993

U.S. Nuclear Regulatory Commission  
Regional Administrator, Region III  
799 Roosevelt Road  
Glen Ellyn, Ill 60137

Ladies/Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Reply to Open Item, NRC Inspection Report 50-305/93009(DRS)

Reference: 1) Letter from T. O. Martin (NRC) to C. A. Schrock (WPSC) dated  
May 27, 1993

Pursuant to your request in reference 1, the attachment to this letter provides our written response to the open item identified during the NRC inspection conducted during the week of May 3-7, 1993. This response indicates the actions included in our licensed operator requalification program which ensures that licensed operators have the ability to perform plant control manipulations in lieu of actual performance.

If you have any questions concerning this issue, please contact me or a member of my staff.

Sincerely,

*C.A. Schrock*

C. A. Schrock  
Manager-Nuclear Engineering

RTS/jms  
Attach.

cc - US NRC Senior Resident Inspector  
NRC Document Control Desk  
NRC Director Division of Reactor Safety, Region III

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PDR ADOCK 05000305  
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**Attachment**

**to**

**Letter from C. A. Schrock (WPSC) to NRC Regional Administrator, Region III**

**Dated**

**June 28, 1993**

**Regarding**

**NRC Inspection Report No. 50-305/93009(DRS)**

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NRC Concern

O-LRQ-TP Rev. F, section 7.2.1.b, NOTE stated, "The licensed individual does not have to physically perform the manipulation provided the individual is directly involved as a team member in the performance of the manipulation."

10 CFR 55.59.c.3.i requires, in part, that each licensed operator of a utilization facility manipulates the plant controls and each licensed senior operator either manipulates the controls or directs the activities of individuals during plant control manipulations for items described in paragraphs c.3.i (A) through (L) on an annual basis and all other items on a two-year cycle.

10 CFR 50.54.i-1 states in part that the licensee shall have in effect an operator requalification program which must as a minimum, meet the requirements of 55.59(c).

The records reviewed by the inspectors indicated that all licensed operators had been given credit for all required plant control manipulations. However, the inspectors could not conclude from the records reviewed that all licensed ROs manipulated the controls and that all licensed senior reactor operators (SROs) either manipulated the controls or directed the activities of the individuals during the plant control manipulations. All individuals on a particular crew are given credit for all plant control manipulations performed during each simulator training session they attend by virtue of being a member of the crew.

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The inspectors identified an instance when six individuals each received credit for four plant control manipulations exercised during a single simulator training session they attended. A separate instance was identified when five individuals each received credit for six plant control manipulations exercised.

The inspectors concluded that generally the licensee's program was in accordance with 10 CFR 55.59 requirements, however, the inspectors requested the licensee to provide a written response indicating what actions are taken by their program to verify that licensed operators have the ability to perform plant control manipulations in lieu of actual performance.

#### Wpsc Response

The Kewaunee Licensed Operator Requalification Training Program (O-LRQ-TP, Rev. F) states that "The licensed individual does not have to physically perform the manipulation provided the individual is directly involved as a team member in the performance of the manipulation." 10 CFR 55.59 (c)(3)(i) states in part, "... However, the requalification programs must contain a commitment that each individual shall perform or participate in a combination ..." Therefore the current program satisfies the licensed operator control manipulations requirement of 10 CFR 55.59. The Kewaunee Nuclear Power Plant requalification program also includes other provisions to aid in maintaining the proficiency of the operators, as discussed below.

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Kewaunee currently has 25 different plant specific Plant Control Manipulations (PCMs) available which are performed to satisfy 10 CFR 55.59(c)(3)(i) requirements A through L. As an example, a review of Cycle 10/Year 1 Simulator Exercise Plans (SEPs) showed that there were actually 84 total PCM performances during the year's requalification training sessions. Due to crew rotation alone during these training sessions, on the average, each licensed individual performed approximately 70% of the 25 PCMs available (with a higher percentage for SROs directing PCMs).

It should be noted that PCMs credited in a given SEP are presented in a structured manner. This includes review prior to the exercise as well as post-exercise discussions and critiques. All crew members are required to participate to ensure a complete understanding of the specific exercise presented, including a discussion of any problems encountered with PCMs during the performance of the SEP.

In addition to the performance statistics noted, additional manipulations were performed during weekly simulator dynamics, annual operating exam practice sessions (dynamics and Job Performance Measures (JPMs)), and annual operational examinations (dynamics and JPMs). Each simulator exam and practice session contained at least two PCMs. Although not documented, performance of these additional manipulations provides another opportunity to verify operator performance.

The requalification program training responsibility extends to the Assistant Manager - Plant Operations who ensures that the on-shift Operations staff maintains the necessary training to perform their assigned tasks. While on-shift, additional manipulations (undocumented), subject to Operations Management observation, were performed during this past year as plant conditions allowed. The on-shift training required by O-LRQ-TP also requires all JPMs (which include various PCMs) to be reviewed by each operator once every two year cycle. This aspect of the program provides another mechanism for operator training and feedback into the requalification training program.

The requalification program is also complemented by a series of plant programs, procedures, and directives which are in place at the Kewaunee Plant to allow for continuous verification of operators' abilities to perform plant control manipulations, and to initiate appropriate corrective actions upon identification of any deficiencies. Procedures, such as Nuclear Training Procedures and Administrative Directives, provide methods for monitoring on-the-job performance and for offering feedback into the training program. Various programs, such as the Incident Report (IR) program and the Operating Experience Assessment (OEA) program, identify weaknesses or potential weaknesses and provide feedback into the training program.

By combining formal requalification training sessions with on-shift performance verification, evaluations using proactive and reactive procedures and programs, and by obtaining feedback from each, Wisconsin Public Service Corporation is confident that the licensed operators have the ability to perform all plant control manipulations.