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SESSION NBR: 9308230203 DOC. DATE: 93/08/16 NOTARIZED: NO DOCKET #
 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305

AUTH. NAME AUTHOR AFFILIATION
 SCHROCK, C.A. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 930715 ltr re violation noted in Insp Rept 50-305/93-13. Corrective actions: QA staff involved counseled on importance of following listed procedures & QA Directive 3.2, "Emergency Preparedness Program Audit" will be revised.

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WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

August 16, 1993

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Reply to Notice of Violation, Inspection Report 93-13

- Reference:
- 1) Letter from Bruce L. Jorgensen (NRC) to C. A. Schrock (WPSC) dated July 15, 1993
 - 2) Letter from C. A. Schrock (WPSC) to Document Control Desk (NRC) dated August 4, 1993

In Reference 1, the Nuclear Regulatory Commission (NRC) identified a violation concerning Wisconsin Public Service Corporation's (WPSC) failure to include an evaluation for adequacy of interfaces with state and local governments in its review of the Kewaunee Emergency Preparedness program.

Attachment 1 to this letter contains our response to this notice of violation. 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

BJD/cjt

Attach.

cc - U.S. NRC - Region III
U.S. NRC - Senior Resident Inspector

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Attachment 1

to

Letter from C. A. Schrock (WPSC)

to

Document Control Desk (NRC)

dated August 16, 1993

regarding Inspection Report 50-305/93013

Document Control Desk
August 16, 1993
Attachment 1, Page 1

NRC Notice of Violation

10 CFR 50.54(t) states, in part, that "the licensee shall provide for a review of its emergency preparedness program at least every 12 months. . . The review shall include an evaluation for adequacy of interfaces with State and local governments. . .

Contrary to the above, between January 1992 and February 1993, a period exceeding 12 months, a review of the Kewaunee Emergency Preparedness program did not address the adequacy of the offsite interface.

This is a Severity Level IV violation (Supplement VIII).

WPSC Response

WPSC has reviewed the Notice of Violation and believes that clarification of the circumstances surrounding the violation is necessary. An evaluation of the adequacy of offsite interface was conducted during the period of January 1992 through February 1993; however, during this evaluation state and local representatives were not contacted as required by Kewaunee's procedures. In a letter to the NRC dated July 12, 1991, WPSC committed to revise Quality Assurance Directive (QAD) 3.2, "Emergency Preparedness Program Audit", to direct the auditor to review county round table and Utility Planning Committee meeting minutes annually and contact representatives from Kewaunee and Manitowoc County Emergency Governments and the State of Wisconsin, Division of Emergency Government. This QAD revision was issued on September 30, 1991.

WPSC's evaluation was conducted as a part of Quality Assurance (QA) Audit number 92-118 and consisted of a review of meeting minutes between WPSC and representatives from the Kewaunee and Manitowoc County Emergency Governments and the State of Wisconsin, Division of Emergency Government (WDEG). The results of the review, which are contained in Audit Report 92-118, dated December 23, 1992, state "The Lead Auditor is on distribution for pager test results, training status reports and correspondence with State and Local Emergency Governments, and therefore, reviews these areas throughout the year. The quarterly Utility Planning Committee meetings between affected utilities and various parts of the state government dealing with emergency preparedness, is an excellent method of self assessment. These meetings also promote uniformity among the utilities. No serious problems were noted in the meeting minutes."

Document Control Desk
August 16, 1993
Attachment 1, Page 2

In a letter from David R. Seebart (WPSC) to Garrett A. Nielsen (WDEG), dated December 28, 1992, WPSC forwarded the appropriate page from WPSC Quality Assurance (QA) Audit Report 92-118. The letter also stated that the interface review was accomplished by reviewing Utility Planning Committee (UPC) meeting minutes and County Roundtable meeting minutes. This letter prompted a response from the WDEG, which is discussed below.

Inspection Report 50-305/93013, page 6, states

"No evaluation of the adequacy of the offsite interface was performed, and offsite representatives were not contacted. Audit file documents indicate that on January 8, 1993 the Wisconsin Division of Emergency Government commented that they felt that the evaluation of offsite interfaces was inadequate".

The actual wording from the Wisconsin Division of Emergency Government's (WDEG) January 8, 1993 letter states

". . . WPSC's Q/A reporting format doesn't allow sufficient opportunity for discussion of mutual concerns between WPSC and its related off-site agencies. I want to assure you that we have not had inajor problems in working with your company. Indeed, our relationship with Wisconsin Public Service has always been a positive and constructive one. However we believe that the state and local agencies are directly affected by the way the KNPP operates, and therefore should have a formal opportunity to express whether or not those interactive relationships between us are working and how well they are working".

In response to the WDEG's concern, several discussions were held between EP and QA staff in January, 1993. State and county contacts were provided to the QA Department for conducting a telephone interview to determine their views on the effectiveness of the interaction between the respective EP programs.

In followup discussions between the WDEG and WPSC's QA Department, subsequent to the NRC inspection, the WDEG stated they felt the interfaee with WPSC has been more than adequate; however, the letter was sent to question why an auditor is not sent to the state for feedback on the Emergency Preparedness (EP) program, which is current practice for 2 of the 4 utilities who deal with the WDEG.

WPSC feels very confident of the adequacy of our interface with state and local governments. WPSC meets regularly with state and local governments to discuss the Kewaunee Nuclear Power Plant's Emergency Preparedness program. On the county level, bimonthly round table discussions are held including the participation of Kewaunee County Emergency Government,

Manitowoc County Emergency Government, Wisconsin Electric Company (Point Beach Nuclear Plant), and WPSC emergency planners. During these discussions, topics such as FEMA and NRC exercise findings, equipment needs, common communication systems and methods, and joint training needs are discussed.

On the state level, the UPC was established to meet quarterly. The members of this committee include:

- The State of Wisconsin, Division of Emergency Government
- The State of Wisconsin, Department of Health and Social Services, Section of Radiation Protection.
- Commonwealth Edison Company
- Northern States Power Company
- Wisconsin Electric Power Company
- Wisconsin Public Service Corporation

Many of the same issues covered in the county round table meetings are also covered during the UPC meeting. However, the emphasis at the state level is to resolve state and utility issues in a manner that provides a consistent method of response and support from one state to four individual utilities. These meetings also address technical and common planning issues as well as state budget development and financial support.

WPSC believes its interface with the state and county representatives is more than adequate and ensures a positive and constructive interface, however, we recognize our failure to follow procedures in this matter. WPSC recognized this weakness prior to the NRC inspection and immediately initiated corrective action. Although WPSC does not agree that this event is the result of ineffective corrective actions, we are taking steps to improve our corrective action program as described in Reference 2.

Corrective actions to address this issue that have or will be taken include the following:

1. Failure of the QA Department to contact state and local representatives is a result of personnel error and a failure to follow procedures. The QA staff involved have been counseled on the importance of following procedures.

2. On July 22, 1993, members of WPSC's QA and EP staff met with state representatives in Madison, Wisconsin. Subsequent to conversations held between WPSC's EP staff and the state representatives, the QA staff interviewed the state representatives regarding offsite interface. No weaknesses and/or concerns were expressed by the state representatives.
3. On August 5, 1993, a member of WPSC's QA staff met with both the Manitowoc and Kewaunee County representatives to solicit feedback on interface effectiveness. No weaknesses and/or concerns were expressed by the local representatives.
4. QAD 3.2 will be revised by December 31, 1993 to include a checklist for the evaluation, which includes the results of QA's review of meeting minutes, and QA's interface with state and local representatives.

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 RECIPIENT NAME RECIPIENT AFFILIATION
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	NRR/PMAS/ILPB1	1 1	NRR/PMAS/ILPB2	1 1
	NUDOCS-ABSTRACT	1 1	OE DIR	1 1
	OGC/HDS1	1 1	<u>REG FILE</u> 02	1 1
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EXTERNAL:	EG&G/BRYCE, J.H.	1 1	NRC PDR	1 1
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August 16, 1993

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cc - U.S. NRC - Region III
U.S. NRC - Senior Resident Inspector

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