



EASYLINK 62891993

WISCONSIN PUBLIC SERVICE CORPORATION

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March 1, 1990

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

Gentlemen:

Docket 50-305 Operating License DPR-43 Kewaunee Nuclear Power Plant Response to Generic Letter 90-01: Request for Voluntary Participation in the NRC Regulatory Impact Survey

Generic Letter 90-01 requested WPSC's participation in completing questionnaires to provide the NRC with insight on the time which key nuclear power plant managers spend in responding to the various operational inspections and audits (including those conducted by the company itself) that are imposed upon them. We appreciate the opportunity to participate in this survey.

Attached are completed questionnaires in the areas of NRC team inspections, other NRC inspections, INPO evaluations, ANI, state/local authorities, NRC required quality assurance audits, safety system functional inspection program, and WPSC's independent technical review program.

We have attempted to be as accurate as possible in completing these questionnaires to ensure that the information provided is reasonable, consistent and of the scope and depth to be effective in improving the regulatory process.

WPSC looks forward to receiving a copy of the final survey report.

Sincerely,

vela K. H. Evers Manager - Nuclear Power

BJD/jms Attach. cc - Mr. Patrick Castleman, US NRC US NRC. Region III

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NRC Regulatory Impact Survey Questionnaire Sheet

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of inspection, au	dit or evaluatio	n: <u>Ot</u> ł	ner NRC Ins	pections	
activity conducted	1? The NRC r	esident in	spector on	a continu	Jous
		Set Set - 1			
with the plant mar	nager.				
ations/Construction	areas covered:	N/A			
ections per year we ters' inspectors.	ere conducted for Since February 1	r the year 1, 1989, i	s 1987-198	9 by NRC f from NRC	ead-
quarters conducted	8 inspections fo	or a total	of 54 NRC	man-days	and 82
man-days.					
owing managers must	spend in direct	: involvem	al basis) w ent before	which the , during,	and in
Plant Department He	ads _ 5%	(number	involved)	6	
Plant Manager <u>5%</u>					
Corporate Departmen	t Heads <u>5%</u>	(number	involved)	2	
Corporate Departmen Corporate Vice Pres			involved)		
	d on actual experie activity conducted s audits operations el on a daily basis with the plant mar ations/Construction nt of the activity ections per year we ters' inspectors. quarters conducted man-days. oximate percentage owing managers must onse to the activit Plant Department He	d on actual experience over the paractivity conducted? <u>The NRC restaudits operations throughout the</u> <u>el on a daily basis. Approximately</u> <u>with the plant manager.</u> ations/Construction areas covered: <u>nt of the activity (how many people</u> <u>ections per year were conducted for</u> <u>ters' inspectors. Since February 1</u> <u>quarters conducted 8 inspections for</u> <u>man-days.</u> oximate percentage of total time (co owing managers must spend in direct onse to the activity described in 1 Plant Department Heads <u>5%</u>	d on actual experience over the past several activity conducted? <u>The NRC resident in</u> <u>s audits operations throughout the year and</u> <u>el on a daily basis. Approximately every 45</u> with the plant manager. ations/Construction areas covered: <u>N/A</u> nt of the activity (how many people, for how <u>ections per year were conducted for the year</u> <u>ters' inspectors. Since February 1, 1989, i</u> <u>quarters conducted 8 inspections for a total</u> <u>man-days.</u> oximate percentage of total time (on an annu owing managers must spend in direct involvem onse to the activity described in Item #1. Plant Department Heads <u>5%</u> (number	d on actual experience over the past several years, ab activity conducted? <u>The NRC resident inspector on</u> s audits operations throughout the year and interfaces el on a daily basis. Approximately every 45 days an e with the plant manager. ations/Construction areas covered: <u>N/A</u> nt of the activity (how many people, for how long) <u>ections per year were conducted for the years 1987-198</u> ters' inspectors. Since February 1, 1989, inspectors guarters conducted 8 inspections for a total of 54 NRC man-days. oximate percentage of total time (on an annual basis) o owing managers must spend in direct involvement before onse to the activity described in Item #1. Plant Department Heads <u>5%</u> (number involved)	ations/Construction areas covered:

1. Type of inspection, audit or evaluation: NRC Team Inspections

	ed on actual experience over the past several years, about how often is is activity conducted? <u>Varies from 2-5 per year, depending on</u>
iss	ues.
Ope	rations/Construction areas covered: <u>N/A</u>
Ext	ent of the activity (how many people, for how long) Approximately
	NKC inspections were conducted over the past three years, involving
	NRC inspections were conducted over the past three years, involving
rou	ghly 31 NRC inspectors. For the most part, one WPS employee is dedi-
rou	
cat App fol	ghly 31 NRC inspectors. For the most part, one WPS employee is dedi-
cat App fol	ghly 31 NRC inspectors. For the most part, one WPS employee is dedi- ed for each NRC inspector. roximate percentage of total time (on an annual basis) which the lowing managers must spend in direct involvement before, during, and in
cat App fol res a.	ghly 31 NRC inspectors. For the most part, one WPS employee is dedi- ed for each NRC inspector. roximate percentage of total time (on an annual basis) which the lowing managers must spend in direct involvement before, during, and in ponse to the activity described in Item #1.
App fol a.	<pre>ghly 31 NRC inspectors. For the most part, one WPS employee is dedi- ed for each NRC inspector. roximate percentage of total time (on an annual basis) which the lowing managers must spend in direct involvement before, during, and in ponse to the activity described in Item #1. Plant Department Heads _5% (number involved) _2</pre>
rou cat Appf fol res a. b. c.	ghly 31 NRC inspectors. For the most part, one WPS employee is dedi- ed for each NRC inspector. roximate percentage of total time (on an annual basis) which the lowing managers must spend in direct involvement before, during, and in ponse to the activity described in Item #1. Plant Department Heads _5% (number involved) _2 Plant Manager

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				ons	tru	icti	on	area	as c	cove	red :		N/A									
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mat	tel	<u>y 14</u>	4 п	an-	day	15 (16	peo	ple/	/9da	eople ys). days-	WP:	<u>5 - 8</u>									
Mat (54 App fol	tel 4 m	y 14 han-d	4 m lays te ma	per	day Dep cen	tag	16 lead	peop s/14	ple/ 46 m otal	/9da nan-i l tin	ys).	WPS Supi)) n ann	<u>ap</u>	al t	asi	tel;	y i	ich	ma th	n-d	ays
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App fol res	tel 4 m pro 110 spo P	y 14 man-d xima wing nse	4 m ays te ma to De	per nag the	day Dep cen ers ac	tag mu tiv	16 lead st ity Hea	f to spender	ple/ 46 m otal nd i scri	/9da man- l tin in d ibed	ys). days- ne (c irect in]	WPS Supr n ar inv tem	<u>)</u> ann volve #1.	nu	al t ent	asi bef	s) sore	y i	200 ich dur	th ing	n-d	ays
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Typ	pe of inspection, audit or evaluation	n:AN	NI or NEIL	
				-
	sed on actual experience over the pasis activity conducted? <u>Annually</u>	st severa	al years, about ho	ow often is
Ope	erations/Construction areas covered:	<u>N/A</u>		
	tent of the activity (how many people man-days. Two WPSC personnel - 20 m			nspectors-
fol	proximate percentage of total time (c llowing managers must spend in direct sponse to the activity described in 1	tem #1.	ment before, duri	ng, and in
a.	Plant Department Heads <1%	(number	involved) <u>1</u>	
b.	Plant Manager <u><1%</u>			
c.	Corporate Department Heads <1%	(number	involved) <u>1</u>	
d.	Corporate Vice Presidents	(number	involved)	
	Chief Nuclear Officer			

1.	Type	of	inspection.	audit	or	evaluation:	State/Local	Authorities

- Based on actual experience over the past several years, about how often is this activity conducted? <u>Ongoing for approximately six months out of</u>
- 3. Operations/Construction areas covered: <u>Inservice inspection of ASME,</u> <u>Section 11, all repairs and modifications to pressure vessels, boilers,</u> <u>and power piping in accordance with the Department of Industry, Labor and</u> <u>Human Relations, Section 41 & 42 of the State of Wisconsin Administrative</u> <u>Codes.</u>
- Extent of the activity (how many people, for how long) <u>One inspector</u> on-site for approximately six months per year.
- 5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads <u>5%</u> (number involved) <u>1</u>
 - b. Plant Manager <1%

the year.

- c. Corporate Department Heads <1% (number involved) --
- d. Corporate Vice Presidents _ 0 (number involved) _--
- e. Chief Nuclear Officer _ O

NRC Regulatory Impact Survey Questionnaire Sheet

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	e of inspection, audit or evaluation: NRC Required QA Audits
thi	ed on actual experience over the past several years, about how often i s activity conducted? <u>Approximately 60 audits per year; average of</u> man-hours/audit.
	rations/Construction areas covered: <u>All areas as specified in</u> CFR 50 Appendix B.
Ext	ent of the activity (how many people, for how long) <u>12 people full</u> e.
fol	roximate percentage of total time (on an annual basis) which the lowing managers must spend in direct involvement before, during, and ponse to the activity described in Item #1.
fol res	lowing managers must spend in direct involvement before, during, and
fol res	lowing managers must spend in direct involvement before, during, and ponse to the activity described in Item #1.
fol res a.	lowing managers must spend in direct involvement before, during, and ponse to the activity described in Item #1. Plant Department Heads <u>2%</u> (number involved) <u>6</u> Plant Manager <u>2%</u>
fol res a. b.	lowing managers must spend in direct involvement before, during, and ponse to the activity described in Item #1. Plant Department Heads <u>2%</u> (number involved) <u>6</u> Plant Manager <u>2%</u> Corporate Department Heads <u>2%</u> (number involved) <u>6</u>

.

34

NRC Regulatory Impact Survey Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____NRC audit of Safety System

Functional Inspection (SSFI) Program.

- ?. Based on actual experience over the past several years, about how often is this activity conducted? Annually
- Operations/Construction areas covered: <u>SSFI, company response to find-</u> ings.
- Extent of the activity (how many people, for how long) <u>One inspector</u> for one week.
- Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads <1% (number involved) 1

b. Plant Manager <1%

c. Corporate Department Heads <1% (number involved) 2

d. Corporate Vice Presidents _-_ (number involved) _--

e. Chief Nuclear Officer _--

1.	Type of inspection,	audit or	evaluation:	Safety System Functiona	
	Inspections				

- Based on actual experience over the past several years, about how often is this activity conducted? ______ Average of 14 weeks per year.
- Operations/Construction areas covered: <u>Design</u>, operations, maintenance, QA, training, testing.
- Extent of the activity (how many people, for how long) <u>8 people for</u> 14 weeks.
- 5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads 15% (number involved) 5

- b. Plant Manager _5%
- c. Corporate Department Heads 5-10% (number involved) 6
- d. Corporate Vice Presidents 5% (number involved) 1
- e. Chief Nuclear Officer 9

- Type of inspection, audit or evaluation: <u>Independent Technical Review</u> Program (Critical Self-assessment Program).
- 2. Based on actual experience over the past several years, about how often is this activity conducted? On average eight reviews are conducted each

year.

- Operations/Construction areas covered: <u>All nuclear programs are can-</u> didate for review.
- 4. Extent of the activity (how many people, for how long) <u>In 1989 the</u> <u>average per review was 537.5 man-hours. WPSC staff totaled 3000 hrs.</u> <u>Contracted labor was 1300 hours. Approximately 50 WPSC employees had 1 or</u> more hours of involvement in this program.
- Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads <1% (number involved) 1*
 - b. Plant Manager <1%
 - c. Corporate Department Heads <1% (number involved) 6*
 - d. Corporate Vice Presidents <1% (number involved) 1
 - e. Chief Nuclear Officer <1%
 - *Actual numbers for 1989. Can change from year to year depending upon the areas being reviewed.

Completion of this questionnaire for the Independent Technical Review Program required approximately 24 man-hours.