



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,

A handwritten signature in dark ink, appearing to read "K. H. Evers".

K. H. Evers
Manager - Nuclear Power

BJD/jms

Attach.

cc - Mr. Patrick Castleman, US NRC
US NRC, Region III

**NRC Regulatory Impact Survey
Questionnaire Sheet**

1. Type of inspection, audit or evaluation: Other NRC Inspections
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2. Based on actual experience over the past several years, about how often is this activity conducted? The NRC resident inspector on a continuous basis audits operations throughout the year and interfaces with WPSC personnel on a daily basis. Approximately every 45 days an exit meeting is held with the plant manager.
3. Operations/Construction areas covered: N/A
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4. Extent of the activity (how many people, for how long) An average of 8 inspections per year were conducted for the years 1987-1989 by NRC headquarters' inspectors. Since February 1, 1989, inspectors from NRC headquarters conducted 8 inspections for a total of 54 NRC man-days and 82 WPSC man-days.
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 5% (number involved) 6
- b. Plant Manager 5%
- c. Corporate Department Heads 5% (number involved) 2
- d. Corporate Vice Presidents -- (number involved) --
- e. Chief Nuclear Officer --

**NRC Regulatory Impact Survey
Questionnaire Sheet**

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

2. Based on actual experience over the past several years, about how often is this activity conducted? Varies from 2-5 per year, depending on
issues.

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long) Approximately
ten NRC inspections were conducted over the past three years, involving
roughly 31 NRC inspectors. For the most part, one WPS employee is dedi-
cated for each NRC inspector.

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 5% (number involved) 2
 - b. Plant Manager --
 - c. Corporate Department Heads -- (number involved) --
 - d. Corporate Vice Presidents -- (number involved) --
 - e. Chief Nuclear Officer --

**NRC Regulatory Impact Survey
Questionnaire Sheet**

1. Type of inspection, audit or evaluation: INPO Evaluations

2. Based on actual experience over the past several years, about how often is this activity conducted? Once every 18 months - varies on our performance.

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long) INPO - approximately 144 man-days (16 people/9days). WPS - approximately 200 man-days - (54 man-days - Dept Heads/146 man-days-Supr)

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

**NRC Regulatory Impact Survey
Questionnaire Sheet**

1. Type of inspection, audit or evaluation: ANI or NEIL

2. Based on actual experience over the past several years, about how often is this activity conducted? Annually

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long) Two Inspectors-
10 man-days. Two WPSC personnel - 20 man-days.

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 <1% (number involved) 1
 - b. Plant Manager <1%
 - c. Corporate Department Heads <1% (number involved) 1
 - d. Corporate Vice Presidents -- (number involved) --
 - e. Chief Nuclear Officer --

**NRC Regulatory Impact Survey
Questionnaire Sheet**

1. Type of inspection, audit or evaluation: State/Local Authorities
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2. Based on actual experience over the past several years, about how often is this activity conducted? Ongoing for approximately six months out of the year.
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3. Operations/Construction areas covered: Inservice inspection of ASME, Section 11, all repairs and modifications to pressure vessels, boilers, and power piping in accordance with the Department of Industry, Labor and Human Relations, Section 41 & 42 of the State of Wisconsin Administrative Codes.
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4. Extent of the activity (how many people, for how long) One inspector on-site for approximately six months per year.
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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 5% (number involved) 1
- b. Plant Manager <1%
- c. Corporate Department Heads <1% (number involved) --
- d. Corporate Vice Presidents 0 (number involved) --
- e. Chief Nuclear Officer 0

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC Required QA Audits
2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 60 audits per year; average of 90 man-hours/audit.
3. Operations/Construction areas covered: All areas as specified in 10 CFR 50 Appendix B.
4. Extent of the activity (how many people, for how long) 12 people full time.
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 2% (number involved) 6
 - b. Plant Manager 2%
 - c. Corporate Department Heads 2% (number involved) 6
 - d. Corporate Vice Presidents 1% (number involved) 1
 - e. Chief Nuclear Officer --

**NRC Regulatory Impact Survey
Questionnaire Sheet**

1. Type of inspection, audit or evaluation: NRC audit of Safety System
Functional Inspection (SSFI) Program.

2. Based on actual experience over the past several years, about how often is this activity conducted? Annually

3. Operations/Construction areas covered: SSFI, company response to find-
ings.

4. Extent of the activity (how many people, for how long) One inspector
for one week.

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 <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 --

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Safety System Functional
Inspections
2. Based on actual experience over the past several years, about how often is this activity conducted? Average of 14 weeks per year.
3. Operations/Construction areas covered: Design, operations, maintenance, QA, training, testing.
4. Extent of the activity (how many people, for how long) 8 people for
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

**NRC Regulatory Impact Survey
Questionnaire Sheet**

1. Type of inspection, audit or evaluation: Independent Technical Review 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.

3. Operations/Construction areas covered: All nuclear programs are candidate for review.

4. Extent of the activity (how many people, for how long) In 1989 the average per review was 537.5 man-hours. WPSC staff totaled 3000 hrs. Contracted labor was 1300 hours. Approximately 50 WPSC employees had 1 or more hours of involvement in this program.

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 <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.