

## WISCONSIN PUBLIC SERVICE CORPORATION



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

July 6, 1984

Mr. C. J. Paperiello, Chief  
 Emergency Preparedness and  
 Radiological Safety Branch  
 U. S. Nuclear Regulatory Commission  
 Region III  
 700 Roosevelt Road  
 Glen Ellyn, IL 60137

Dear Mr. Paperiello:

Docket 50-305  
 Operating License DPR-43  
 Kewaunee Nuclear Power Plant  
 Inspection Report 84-05

Reference: Letter from C. J. Paperiello (USNRC) to C. W. Giesler (WPSC)  
 dated June 6, 1984, transmitting Inspection Report 50-305/84-05.

The attachment to this letter details our response to the item of noncompliance identified by Mr. R. A. Paul and Ms. N. A. Nicholson of your office in Inspection Report 84-05 (ORMSP).

Very truly yours,

*C. W. Giesler*

C. W. Giesler  
 Vice President - Power Production

CAS:jks

Attachment

cc - Mr. Robert Nelson, US NRC  
 Mr. S. A. Varga, US NRC

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ATTACHMENT

Response to Item of Noncompliance

Inspection Report 84-05

Item of Noncompliance

Technical Specification 6.11 requires that radiation control procedures be maintained and adhered to for all operations involving personnel radiation exposures.

Procedure RC-HP-40J states the multi-source gamma calibrator will receive an annual calibration.

Contrary to the above, according to license records, the gamma calibrator had not been calibrated since July 1982, a period greater than one year.

Response:

The failure to perform the calibration of the multi-source calibrator was primarily the result of events outside of our control. WPSC was evaluating a utility notification made pursuant to 10 CFR 50.55(e) concerning the quality program of the secondary calibration standard supplier.<sup>1</sup> In addition, the secondary calibration standards were damaged during shipment and had to be returned to the vendor for recalibration. When the secondary standards finally were received prior to the 1984 refueling/maintenance outage, the primary calibrator was in use for the calibration of instruments to be used during the outage. Thus the primary calibrator was unavailable, causing a further delay in its calibration. These events were discussed with the NRC inspectors during their inspection.

<sup>1</sup> Letter from J. W. Cook, Consumers Power Company, to J. G. Keppler, USNRC, dated October 15, 1982

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The calibration of the multi-source calibrator was completed on June 27, 1984, placing WPSC in full compliance with this requirement.

To prevent recurrence of similar events, when circumstances arise which prevent compliance with procedural requirements, further action will be taken to obtain compliance or implement an appropriate revision to the procedure, depending on the evaluation of the event.