AUG R'MRA

Docket No. 50-305

Wisconsin Public Service Corporation ATTN: Mr. C. W. Giesler Vice President Nuclear Power Post Office Box 1200 Green Bay, WI 54305

Gentlemen:

This refers to the routine safety inspection conducted by Mr. W. Snell and others of this office on July 9-13, 1984 of activities at the Kewaunee Nuclear Power Plant authorized by NRC Operating License No. DPR-43 and to the discussion of our findings with Mr. D. Hintz and others of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in non-compliance with NRC requirements, as specified in the enclosed Appendix A. A written response is required.

Weaknesses that were identified in this inspection are summarized in the attached Appendix B to this letter. Please advise us within 45 days of the date of this letter of the action you plan to take showing the estimated date of completion, with regard to these weaknesses.

We are concerned about the elimination of one of the specified individuals from your minumum shift crew, namely, the communicator. Although this change was presented by you in your letter of April 15, 1983, responding to Supplement 1 of NUREG-0737, minimum shift staffing was not reviewed as part of that submittal. Accordingly, the Commission Order dated June 12, 1984, was issued

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to confirm your commitments to implement Supplement 1 requirements, which do not specify minimum staffing levels. Since being informed by your staff that you plan to reduce your staffing levels, we have reviewed your April 15, 1983, correspondence and determined that there is insufficient information to justify that your proposed minimum shift staff meets the requirements of 10 CFR 50.47(b)(2). Please provide this office, within 45 days, additional information as to what studies you have performed to indicate that your proposed staffing levels meet the requirements of 10 CFR 50.47(b)(2). Based upon a telephone conversation between Mr. C. Schrock of your office and Mr. W. Snell of this office, we also learned that the "trainees" described in Figure 5-2, Revision 3, of your Emergency Plan are not always on shift. Our review of this figure was utilized to determine that minimum staffing levels which met the requirements of 10 CFR 50.47(b)(2) were in effect. Since 10 CFR 50.54(q) requires NRC approval of any change to the Emergency Plan which would downgrade its effectiveness prior to its implementation, please provide clarification on the shift status of these trainees within 45 days so that we may determine whether the conclusions reached in our evaluation of Revision 3 of your Emergency Plan which were sent to you by letter dated June 1, 1984, are still valid.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosures, and your responses to this letter will be placed in the Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

J. A. Hind, Director Division of Radiation Safety and Safeguards

Enclosures:

- Appendix A, Notice of 1. Violation
- Appendix B, Emergency Preparedness Weaknesses
- Inspection Report No. 50-305/84-07(DRSS)

cc w/encls:

D. C. Hintz, Plant Superintendent DMB/Document Control Desk (RIDS) Resident Inspector, RIII John J. Duffy, Chief Boiler Section Ness Flores, Chairperson Wisconsin Public Service Commission D. Matthews, EPB, OIE W. Weaver, FEMA, Region V

07/30/84

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