

## WISCONSIN PUBLIC SERVICE CORPORATION

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



February 8, 1985

Mr. William S. Little  
 Chief, Operations Branch  
 Region III  
 U.S. Nuclear Regulatory Commission  
 799 Roosevelt Road  
 Glen Ellyn, IL 60137

Dear Mr. Little:

Docket 50-305  
 Operating License DPR-43  
 Kewaunee Nuclear Power Plant  
 Inspection Report No. 50-305/84-20 (DRS)

References: 1) W. S. Little to D. C. Hintz, January 8, 1985, Inspection Report  
 No. 50-305/84-20 (DRS)

On January 15, 1985, Wisconsin Public Service Corporation (WPSC) received a  
 Severity Level V violation regarding failure to respond internally to internal  
 Quality Assurance audit findings within 30 days (reference 1).

Enclosed is WPSC's response to that notice of violation including the corrective  
 actions taken, results achieved, and corrective actions planned to prevent  
 further noncompliance.

Very truly yours,

D. C. Hintz  
 Manager - Nuclear Power

GWH/js

Enc.

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

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Attachment to Letter

From

D. C. Hintz to W. S. Little

Reply To

Inspection Report No. 50-305/84-20 (DRS)

February 3, 1985

Response to Item of Non-Compliance

Routine safety inspections of activities at the Kewaunee Nuclear Power Plant (KNPP) on November 27-30 and December 10-13, 1984 and inspection of activities at WPSC's corporate office on December 4-6, 1984 identified the following violation:

"10 CFR 50, Appendix B, Criterion V as implemented by Section 5 of the WPSC Operational Quality Assurance Program (OQAP) requires that activities affecting quality be prescribed by procedures and accomplished in accordance with the procedures. Procedure QAD 11.2 requires that the responsible supervisors respond to audit open and nonconformance items in writing to the Audit Team Leader within 30 days of the receipt of the audit finding.

Contrary to the above, 13 items on the "Audit Report Open Items and Nonconformance Report," dated November 16, 1984, were not responded to within 30 days.

This is a Severity Level V violation." (reference 1)

Upon identification of this violation all responsible personnel with overdue replies to Audit Report Open Items or Nonconformance Items were notified of the NRC's issuance of a Severity Level V violation and asked to respond in a timely manner. The Plant Manager also discussed the significance of expedient replies to Audit Report Open Items and Nonconformance Items at a morning plant staff meeting. As a result, responses have been received for all the 13 instances of overdue replies noted by the NRC in reference 1.

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To prevent future noncompliance Quality Assurance Directive (QAD) 11.2 will be revised to require:

- The audit team to request a response to open items at the audit exit interview
- A reminder memo be sent to the responsible party prior to the 30-day reply deadline
- A memo be sent to the responsible party and their supervision should the 30-day deadline be exceeded.

These corrective actions will be implemented by March 2, 1985.

Response to Open Item 305/84-20-03

The inspectors identified a concern in regards to the Offsite Review Committee (Our Nuclear Safety Review and Audit Committee) that "there is minimal evidence in both the charter and meeting minutes that the committee is cognizant of the audit program." The inspector requested a review of this and a revision to the charter which would outline the committee's responsibilities regarding the audit program.

This item was reviewed and discussed during meeting 51 of the Nuclear Safety Review and Audit Committee, which was held on February 5 and 6, 1985. It was the consensus of the committee that a charter revision is unnecessary in this regard. This consensus is based on the fact that item IV of the existing charter states "The Committee shall review and audit in accordance with Sections 6.5.3.7 and 6.5.3.8 of the Technical Specifications." These Sections of the Technical Specifications clearly define the Committee's responsibilities.

It was also the consensus of the committee that it is sufficiently cognizant of the audit program. To address the inspector's concern, the committee chose to group the various Quality Assurance items (which are routinely discussed at each meeting) into a standard agenda item. This item will include a report on the QA Audit schedule, audit summaries, and the status of QA open items and non-conformances.

We believe that this action adequately addresses your concern.