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January 25, 1988

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Attn: Docketing Service Branch  
Washington, D.C. 20555

Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Comments on Integrated Schedules for Implementation of Plant  
Modifications (52 FR 45344)

On November 27, 1987 in 52 FR 45344 the Nuclear Regulatory Commission (NRC) requested comments on a proposed policy statement addressing integrated scheduling. This letter contains our comments.

Presently the NRC allows Licensees and their NRC Project Managers to negotiate schedules for NRC mandated changes. See for example Generic Letter 83-28 "Required Action Based on Generic Implementation of Salem ATWAS Events." This improvement in scheduling was implemented in response to the wide spread inability of Licensees to achieve NRC mandated schedules.

The present approach has increased and opened the communication between the NRC and the Wisconsin Public Service Corporation (WPSC), resulting in an "informal living schedule." Through a posture of open communication and trust, WPSC has successfully integrated NRC mandated initiatives into a timely and achievable schedule. This has accomplished the purpose of an integrated schedule without an accompanying drain on NRC and Licensee resources. If a Licensee is still unable or unwilling to complete NRC mandates in a timely manner, NRC has recourse under current rules and policy, which it can take on a plant specific basis.

WPSC is opposed to the integrated schedule because it would require additional NRC and licensee resources to write, process, and review a license amendment or integrated schedule amendment when the schedule is revised. Therefore, coercing the majority of utilities into adopting an integrated schedule would increase the demand on the NRC's and the licensee's resources without a commensurate increase in plant safety or reliability.

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Secretary of the Commission  
January 25, 1988  
Page 2

Attachment 1 contains our responses to specific questions posed by the NRC on 52 FR 45346.

If you have any questions concerning any of our comments please feel free to contact me or a member of my staff.

Sincerely,



C. Hintz  
President - Nuclear Power

Attach.

TJW/cmg

cc - Mr. Robert Nelson, US NRC  
US NRC, Region III

Attachment 1  
to the Letter

Dated:  
January 25, 1988

From:  
D. C. Hintz (WPSC)

To:  
Secretary of the Commission

RE:  
Integrated Scheduling  
(52 FR 45344)

Q1. What is the value of integrated schedules as a planning tool for utilities?

A1. WPSC supports the purpose of an integrated of schedule, i.e., timely but achievable schedules for NRC mandated changes. The majority of nuclear utilities already develop long and short term schedules in order to optimize their resources and to run their nuclear plants safely and economically. Open and frank communications between the NRC and these utilities will accomplish this purpose without increasing the demand on the NRC's and Licensee's resources.

WPSC does not deny that some plants have not completed NRC mandated changes in a timely manner. In these few cases, integrated scheduling might be an effective method of improving plant performance.

However, the present approach to scheduling can work efficiently for the majority of plants. There is no safety or economic reason to impose additional scheduling requirements on these plants.

Q2. What are the advantages and disadvantages of a negotiated commitment on scheduling of the implementation of regulatory requirements?

A2. The widespread inability of licensees to respond to the mandated schedules following the accident at the TMI-2 plant demonstrate that NRC imposed schedules are often unachievable. As a result, the present method of allowing the Licensee and the NRC Project Manager to negotiate schedules was developed. This method ensures proper priority is placed on the requirement while ensuring there is sufficient NRC and Licensee resources to support the schedule. The integrated schedule, as described in the

Federal Register, would not change this method of negotiating schedules but would increase the administrative burden. Therefore, there is a disadvantage to adopting the integrated scheduling process.

Q3. What is the value of having the schedule become a license amendment?

A3. Making the integrated schedule a license amendment would be disadvantageous for the majority of plants. The majority of nuclear utilities develop long and short term schedules in order to optimize their resources. Imposing the additional requirement of a license amendment would divert the licensee's resources from scheduling and implementation of plant improvements to filing and implementing License amendments. It would also divert the NRC's resources from auditing plant modifications to reviewing license amendments.

#### Conclusions

In conclusion the present system of scheduling NRC mandated changes can work for the majority of nuclear utilities. In those few cases where a management breakdown occurs, an integrated schedule may be an effective regulatory tool. However, encouraging implementation industry wide would place greater demands on the NRC's and the Licensee's resources without a commensurate improvement in safety.