



WISCONSIN PUBLIC SERVICE CORPORATION

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DOCKET
USNRC

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DOCKET NUMBER PR-50
PROPOSED RULE
(53 FR 8924)

OFFICE OF
DOCKETING & SERVICE
BRANCH

April 15, 1988

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
53 FR 8924, Announcement of Inspectors

We have reviewed the subject proposed rule and the draft NUMARC comments to it dated April 11, 1988. WPSC endorses the NUMARC comments as supplemented below.

We are seriously concerned about the health and well-being of any individual admitted to the site with minimal or no familiarity with the site or plant conditions. Changing plant conditions require that personnel consult with various plant departments in order to avoid the hazards of an industrial facility. WPSC could be held liable for injury to an NRC inspector without first having an opportunity for prevention by advising the individual of known hazards.

A second item of concern stems directly from the proposed wording of the rule. The rule states that the licensee shall "ensure" that the arrival and presence of an NRC inspector is not announced or otherwise communicated by its employees to other persons at the facility unless specifically requested to do so. This wording is overly broad and vague and represents an impossible task for the licensee. It is far more reasonable to require a licensee to develop procedures to prohibit intentional notification of the target of the inspection by the site security group for a specified period of time when requested to do so by the inspector in writing.

Thirdly, there is no limit with regard to when NRC could use this audit technique. We view this method as radical and as such should be reserved for situations where the NRC has reasonable suspicions that its regulations that have a direct impact on public health and safety are being intentionally violated.

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Lastly, the nuclear industry has made a concerted effort to maintain a good working relationship with the NRC by maintaining a free and candid dialog through individual licensees, NUMARC, INPO & other groups formed to resolve specific issues. This rule, if promulgated, will tend to introduce an element of unintended antagonism in NRC/Licensee relationships.

Thank you for your consideration of these comments.

Sincerely,

Mark L. Hantz for
D. C. Hintz
Vice President - Nuclear Power

DWS/jms

cc - Mr. Robert Nelson, US NRC
US NRC, Region III
US NRC Document Control Desk