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U.S. NUCLEAR REGULATORY COMMISSION
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Attention Mr. James G. Partlow
Associate Director for Projects

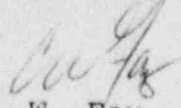
Gentlemen:

GENERIC LETTER NO. 90-01
NRC REGULATORY IMPACT SURVEY

NRC Generic Letter No. 90-01, "Request for Voluntary Participation in NRC Regulatory Impact Survey," dated January 18, 1990, requested that nuclear utilities complete a questionnaire to provide the NRC with insight on the time which key nuclear power plant managers spend in responding to the various operational inspection and audits that are imposed upon them. Attached to this letter are our responses to that questionnaire. As directed in Item 1 of the enclosure to the generic letter, we have separated our responses into the categories of inspection, audit, or evaluation as you identified. Please note that under Item 5 of the questionnaire, we have listed total manhours in the categories, not percentage of total time. This is consistent with the additional clarifying information we received from NUMARC enclosed with Mr. Joe F. Colvin's letter dated February 16, 1990.

We wish to clarify that we have responded to this survey from the viewpoint of our nuclear power department managers. As a corporation, we are subjected to additional inspections and audits by agencies identified in these questionnaires which involve other departments at Wisconsin Electric. The impacts on other departments have not been estimated in our response.

Very truly yours,


C. W. Fay
Vice President
Nuclear Power

Copy to NRC Regional Inspector, Region III
NRC Resident Inspector
Mr. Joe Colvin (NUMARC)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
NRC Team Inspections
2. Based on actual experience over the past several years, about how often is this activity conducted? _____
Two team inspections each year.
3. Operations/Construction areas covered: _____

4. Extent of the activity (how many people, for how long) _____
Teams typically are 4-6 people and are on-site for one
to two weeks.

5. Approximate ~~percentage of~~ total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 190 MH (number involved) 6
 - b. Plant Manager 20 MH
 - c. Corporate Department Heads 66 MH (number involved) 3
 - d. Corporate Vice Presidents 10 MH (number involved) 1
 - e. Chief Nuclear Officer (same as d)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
NRC Resident Inspections
2. Based on actual experience over the past several years, about how often is this activity conducted? _____
Two resident inspectors are assigned/approximately 430 MH/year.
3. Operations/Construction areas covered: _____

4. Extent of the activity (how many people, for how long) _____
See item two.

5. Approximate ~~percentage of~~ total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 243 MH (number involved) 6
 - b. Plant Manager 60 MH
 - c. Corporate Department Heads 71 MH (number involved) 3
 - d. Corporate Vice Presidents 15 MH (number involved) 1
 - e. Chief Nuclear Officer (same as d)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
Other NRC Regional and Headquarters
2. Based on actual experience over the past several years, about how often is this activity conducted? _____
One inspection every 2-3 weeks.
3. Operations/Construction areas covered: _____

4. Extent of the activity (how many people, for how long) _____
Typically 1-3 people for 2-4 days.

5. Approximate ~~percentage of~~ total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 355 MH (number involved) 6
 - b. Plant Manager 80 MH
 - c. Corporate Department Heads 200 MH (number involved) 3
 - d. Corporate Vice Presidents 20 MH (number involved) 1
 - e. Chief Nuclear Officer (same as d)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
INPO Evaluations
2. Based on actual experience over the past several years, about how often is this activity conducted? _____
One INPO evaluation each year, one training accreditation.
3. Operations/Construction areas covered: _____

4. Extent of the activity (how many people, for how long) _____
Evaluation 15-17 people for two weeks.
Accreditation 2 people for 2-3 days.

5. Approximate ~~percentage of~~ total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 530 MH (number involved) 6
 - b. Plant Manager 85
 - c. Corporate Department Heads 155 MH (number involved) 3
 - d. Corporate Vice Presidents 20 MH (number involved) 1
 - e. Chief Nuclear Officer (same as d)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
Insurers
2. Based on actual experience over the past several years, about how often is this activity conducted? _____
One resident inspector. Other inspections every other month.
3. Operations/Construction areas covered: Fire protection, pressure vessel inspections, property coverage, liability coverage, and machinery inspections
4. Extent of the activity (how many people, for how long) _____
One or two inspectors for 2-3 days
Resident Inspector on site about 15-20 days/month
5. Approximate ~~percentage of~~ total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 50 MH (number involved) 6
 - b. Plant Manager 15 MH
 - c. Corporate Department Heads 26 MH (number involved) 3
 - d. Corporate Vice Presidents 80 MH (number involved) 1 Note 1
 - e. Chief Nuclear Officer (SAME AS d)

1. Corporate VP is member of advisory committee of mutual nuclear insurance concerns.

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: EPA
2. Based on actual experience over the past several years, about how often is this activity conducted? No on-site or Nuclear Power Department inspection in the past two years.
3. Operations/Construction areas covered: NA
4. Extent of the activity (how many people, for how long) None
5. Approximate ~~percentage of~~ total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- a. Plant Department Heads 0 (number involved) 6
- b. Plant Manager 0
- c. Corporate Department Heads 0 (number involved) 1
- d. Corporate Vice Presidents 2 MH (number involved) 1
- e. Chief Nuclear Officer (same as d)

MRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
OSHA
2. Based on actual experience over the past several years, about how often is this activity conducted? _____
One/year or less
3. Operations/Construction areas covered: _____
Safety inspection and incident investigation
4. Extent of the activity (how many people, for how long) _____
One inspector for two days
5. Approximate ~~percentage~~ of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 45 MH (number involved) 6
 - b. Plant Manager 7 MH
 - c. Corporate Department Heads 0 MH (number involved) 3
 - d. Corporate Vice Presidents 2 MH (number involved) 1
 - e. Chief Nuclear Officer (same as d)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
Department of Transportation
2. Based on actual experience over the past several years, about how often is this activity conducted? _____
No inspections in past several years.
3. Operations/Construction areas covered: _____
Spent fuel shipping procedures and equipment. LLW shipping.
4. Extent of the activity (how many people, for how long) _____
During spent fuel shipping activities, we experienced
several inspections each year. Typically one inspector for
one day.
5. Approximate ~~percentage of~~ total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 0 MH (number involved) 6
 - b. Plant Manager 0 MH
 - c. Corporate Department Heads 0 MH (number involved) 3
 - d. Corporate Vice Presidents 0 MH (number involved) 1
 - e. Chief Nuclear Officer (Same as d)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
State/Local Authorities
2. Based on actual experience over the past several years, about how often is this activity conducted? _____
Two to three inspections per year/one audit per year.
3. Operations/Construction areas covered: _____
Discharge permit compliance, elevator inspections, machinery inspections for state certification, accounting practices and generation forecasting.
4. Extent of the activity (how many people, for how long) _____
One or two inspectors for one or two days on site.
One auditor for 3-4 days at corporate office.

5. Approximate ~~percentage of~~ total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 24 MH (number involved) 6
 - b. Plant Manager 8 MH
 - c. Corporate Department Heads 60 MH (number involved) 3
 - d. Corporate Vice Presidents 8 MH (number involved) 1
 - e. Chief Nuclear Officer (same as d)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
NRC required QA audits
2. Based on actual experience over the past several years, about how often is this activity conducted? _____
Approximately ten inspections/audits per year
3. Operations/Construction areas covered: _____
Fire protection, technical specification audit, modification
audit, emergency planning, ALARA.
4. Extent of the activity (how many people, for how long) _____
One or two people for 2-3 days, response to findings
require many manhours.
5. Approximate ~~percentage of~~ total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 510 MH (number involved) 6
 - b. Plant Manager 45 MH
 - c. Corporate Department Heads 120 MH (number involved) 3
 - d. Corporate Vice Presidents 10 MH (number involved) 1
 - e. Chief Nuclear Officer (Same as d)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
Self-assessments
2. Based on actual experience over the past several years, about how often is this activity conducted? _____
Once per year
3. Operations/Construction areas covered: _____
Electrical distribution, RHR design, containment design
4. Extent of the activity (how many people, for how long) _____
Three to four people for two weeks
5. Approximate ~~percentage of~~ total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 330 MH (number involved) 6
 - b. Plant Manager 60 MH
 - c. Corporate Department Heads 130 MH (number involved) 3
 - d. Corporate Vice Presidents 16 MH (number involved) 1
 - e. Chief Nuclear Officer SAME AS D)