

WISCONSIN PUBLIC SERVICE CORPORATION



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

November 17, 1983

Mr. J. A. Hind, Director
Division of Radiological and
Materials Safety Programs
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Hind:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
IE Inspection Report 83-13 (DRMSP)

- References:
- 1) IE Inspection Report 83-13 (DRMSP)
 - 2) Letter from C. W. Giesler to J. G. Keppler dated September 12, 1983
 - 3) Letter from J. A. Hind to C. W. Giesler dated October 18, 1983

The attachment to this letter details our response to the unresolved item identified in Inspection Report 83-13 (DRMSP) and further determined to be an item of noncompliance in Reference 3.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Carl W. Giesler".

C. W. Giesler
Vice President - Nuclear Power

DWS/js

Attach.

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

8312280311 831220
PDR ADOCK 05000305
PDR
Q

NOV 21 1983

ATTACHMENTResponse to Item of NoncomplianceIE Inspection Report No. 83013 (DRMSP)Violation:

10CFR50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency Plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). Section IV.B of Appendix E requires that a licensee's emergency plans shall include information to demonstrate compliance with the following:

The means for determining the magnitude and for continually assessing the impact of the release of radioactive material shall be described, including emergency action levels that are to be used as criteria for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety.

10CFR50.47(b)(15) requires that those who may be called on to assist in an emergency be provided radiological emergency response training.

Section 6.4.2 of the Kewaunee Nuclear Power Plant Emergency Plan states in part that the Emergency Director has the authority to recommend protective actions to offsite authorities. Section 5.2.1 states in part that in the event of an incident, the Shift Supervisor is initially the Emergency Director.

Contrary to the above, Shift Supervisors, initially the Emergency Directors, were incapable of determining when and what type of protective measures should be considered outside the site boundary to protect health and safety due to inadequate training in the procedures.

Response:

Wisconsin Public Service accepts the violation as described and furthermore agrees that weaknesses in emergency procedures as identified in the inspection report could have hindered responsible personnel from initiating timely Protective measures. To correct these deficiencies, actions as described in reference 2 have been taken. Specifically, procedures, EP-AD-3 Unusual Event, EP-AD-4 Alert, EP-AD-5 Site Emergency, and EP-AD-6 General Emergency, have been revised to include guidance for the Shift Supervisor in making initial protec-

tive action recommendations to offsite authorities if dose projections or field sample analyses are not available. Additionally, a new procedure, EP-AD-19 Protective Action Guidelines, was issued to consolidate the initial protective action recommendations, the EPA protective action guidelines, and the HEW guidelines for protection against ingestion of contamination. These procedural changes were completed September 29, 1983.

Training in these procedures and protective action guidelines for Shift Supervisors and staff SRO's has been completed with the exception of the simulator Supervisor who has been unavailable due to simulator start-up and validation testing. His training will be completed prior to his next scheduled duty as Shift Supervisor. with the completion of these actions, WPS considers itself in full compliance.

To prevent recurrence, emergency plan and implementing procedures training is being incorporated into the licensed operator requalification training Program. This will provide increased confidence that operators have received the required emergency training.