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March 10, 1992

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

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Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Comments on the Proposed Training Rule

Reference: 57FR537 Publication of the Proposed Training Rule

This provides WPSC's comments on the above referenced Proposed Rule. In general, WPSC is in agreement with the proposed rule, especially in that, it recognizes the industry's effort to improve training through the use of performance based training programs and it endorses a systems approach to training (SAT).

While WPSC agrees with the proposed rule, we suggest an additional step be taken to review 10 CFR 55 to ensure that it complements this rule in its entirety. It is our opinion that certain prescriptive features of 10 CFR 55 may be eliminated by embracing the SAT process, thus improving the quality of training provided under 10 CFR 55.

In conclusion, we agree that the proposed rule is consistent with existing industry practice for personnel training and should be promulgated. We suggest 10 CFR 55 be reviewed in light of this rule.

Sincerely,

C. A. Schrock  
Manager-Nuclear Engineering

djm

cc - Mr. Patrick Castleman, US NRC  
US NRC - Region III  
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