

WISCONSIN PUBLIC SERVICE CORPORATION



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

December 14, 1984

Mr. L. R. Greger, Chief
Emergency Preparedness and
Radiological Protection Branch
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Greger:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Inspection Report 84-17

Reference: Letter from L. R. Greger (US NRC) to D. C. Hintz (WPSC) dated
November 14, 1984, transmitting Inspection Report 50-305/84-17 (DRSS)

The attachment to this letter details our response to Emergency Preparedness
weaknesses identified in Inspection Report 50-305/84-17 (DRSS).

Very truly yours,

Charles A. Schrock for

D. C. Hintz
Manager - Nuclear Power

DSN/js

Attach.

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

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ATTACHMENT

Emergency Preparedness Exercise Weakness

1. The current practice of making shift augmentation notifications prior to the notification of offsite agencies of an emergency classification does not ensure that offsite agencies will be notified within 15 minutes as required by 10 CFR Part 50, Appendix E, Section IV.D.3. Changes should be made in the notification procedure to ensure offsite agencies will be notified within 15 minutes. (Open Item No. 305/84-17-01) (Section 4.a)

Response:

This weakness was a result of the communicator being required to make all the shift augmentation notifications prior to notifying offsite authorities.

The procedures will be revised to require notification of offsite authorities prior to the staff augmentation notifications. This will ensure that offsite agencies will be notified within 15 minutes.

The procedure will be revised in accordance with our annual procedure revision program. The procedure revision is expected to be completed by February 15, 1985.

Emergency Preparedness Exercise Weakness

2. The current practice of using sequential telephone calls in lieu of the pager system, and of having all personnel initially report to the Site Access Facility resulted in an excessive amount of time to activate the Technical Support Center. The licensee should re-examine the methodology for shift augmentation. (Open Item No. 305/84-17-02) (Section 4.b)

Response:

Procedure revisions will be made to provide more dedicated use of the pager system and negate the use of sequential telephone calls when a rapid activation of the Emergency Response Organization is required. This change will require substantial procedure revisions and may necessitate the recoding of pagers.

The revised procedures will be incorporated into the annual Emergency Plan Training Program prior to implementation. We will complete training and implement the revised procedures by October 1, 1985.

The procedures for processing personnel through the Site Access Facility (SAF) prior to entering the plant site are currently under review. A procedure revision to "streamline" the activities at the SAF will be performed in accordance with our annual procedure revision program. We expect the streamlined access procedures to be completed by February 15, 1985.

Emergency Preparedness Exercise Weakness

3. To solve recurring problems with the post accident sampling system, the following changes should be incorporated into EP-RET-3C, "Post Accident Operation of the High Radiation Sampling Room":

- Include in the procedure a method to ensure that the vacuum in the sample bottle is not lost before the sample and dilution volumes are injected into the bottle.

- Include in the procedure a method to obtain different dilution factors for the sample as desired or required.

Response:

Procedure revisions will be made to ensure that the vacuum in the sample bottle is not lost before the sample and the dilution volumes are injected into the bottle. This procedure change will be implemented by February 28, 1985.

The sampling system is designed such that a predetermined dilution will be obtained if the vacuum in the sample bottle is maintained. Therefore, the procedure revision mentioned above should ensure that the proper dilution is performed. As a precautionary measure, we will modify the procedure to provide operator guidance in the event of an "incorrect" dilution. This change will be implemented by February 28, 1985.

WISCONSIN PUBLIC SERVICE CORPORATION



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

December 17, 1984

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Emergency Preparedness Communicator Position

- References:
- 1) Letter from C. W. Giesler to D. G. Eisenhut dated April 15, 1983
 - 2) Letter from J. A. Hind to C. W. Giesler dated August 6, 1984
 - 3) Letter from D. C. Hintz to J. A. Hind dated September 20, 1984
 - 4) Letter from L. R. Greger to D. C. Hintz dated November 14, 1984

In reference 1 we informed you of our plans to add an additional Senior Reactor Operator (SRO) to the shift control room staff by January 2, 1984. It was also noted that with the addition of the extra SRO on shift, that the dedicated communicator position would be eliminated.

A routine safety inspection was conducted by Mr. W. Snell and others from the NRC Region III office on July 9-13, 1984. The resulting Inspection Report (Reference 2) indicated that information regarding the elimination of the Communicator position was not reviewed as part of the April 15, 1983 submittal and therefore the Commission Order dated June 12, 1984 did not address the issue of minimum staffing levels. The Inspection Report stated, "the licensees proposed shift staffing levels are under review by the NRC staff."

In our letter dated September 20, 1984 (reference 3), we responded to the Emergency Preparedness weaknesses identified in reference 2 and also addressed your concerns regarding the minimum shift crew size at KNPP. We concluded that "WPSC has implemented an on shift organization which is sufficient to carry out the actions required by the emergency plan".

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Inspection Report 84-17 (reference 4) provided results of a routine safety inspection conducted at KNPP on October 22-24, 1984 during the implementation of our annual emergency preparedness exercise. The report recommended that we reevaluate the practice of designating the Control Room Supervisor as the Communicator during emergency evolutions as it appeared to be an under utilization of his expertise.

We have reevaluated our position and have developed a method to perform initial notification to offsite authorities in a timely manner and not utilize on-shift control room personnel except for short term technical related communication.

Our proposed notification scheme will include the use of designated security personnel to provide immediate support to the Shift Supervisor in the event of an emergency declaration, except when the emergency is declared for security reasons.

The Shift Supervisor will be responsible for the immediate communications which must be made based on current plant conditions (i.e. NAWAS notification including protective action recommendations, briefing Emergency Director designate on plant status, notifying fire team if warranted, etc.) A designate from the security Force will immediately report to the Control Room and perform non-technical notifications such as pager activation for staff augmentation.

The staff augmentation process will be revised to include the notification of a designated Communicator. We have evaluated our personnel availability and expertise and have developed a list of personnel with plant operations experience who can be contacted to relieve the Shift Supervisor and the Security Force notifier of any long term communications. The personnel selected to fill the designated Communicator position have plant operations experience and live in close proximity to the plant, therefore response time should be minimal.

Should emergency declaration occur due to a security related event, the designated security force notifier position will not be activated. It is anticipated that during security related events the on shift control room staff will be available to perform the initial notifications until relieved by a designated Communicator.

In all cases, the Technical Support Center (TSC) Staff will relieve the Control Room Staff of the offsite communication responsibilities following TSC activation.

Since these procedural and organizational changes are major in scope, the revised procedures will be incorporated into the annual Emergency Plan Training Program prior to implementation. We will complete training and implement the procedures by October 1, 1985.

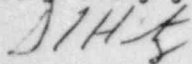
WPSC has exercised our procedures and emergency plan on several occasions (graded exercises and drills) utilizing an on shift staff that is equal in number to the current staff level. We have demonstrated the ability to implement the required provisions of the emergency plan on each of these occasions thus demonstrating the sufficiency of the current staffing level. We feel the proposed revisions will provide additional capabilities to our existing effective program.

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December 17, 1984

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Very truly yours,



D. C. Hintz

Manager - Nuclear Power

DSN:jks

cc - Mr. S. A. Varga, US NRC
Mr. Robert Nelson, US NRC
Mr. William Snell, US NRC
Mr. C. F. Riederer, PSCW