UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TELEPHONE
(312) 858-2660

MAR 2 8 1974

Wisconsin Public Service Corporation
ATTN: Mr. E. W. James
Senior Vice President
Power Generation and Engineering
P. O. Box 1200
Green Bay, Wisconsin 54305

Docket No. 50-305

Gentlemen:

This will acknowledge receipt of your letter dated February 20, 1974, in answer to our letter dated January 28, 1974.

With respect to your response to the item of noncompliance identified by our letter of January 28, 1974, we are in agreement with your statement that the inspection report was vague and lacking specificity as to the deficiencies identified last December with three preoperational tests. However, the specific deficiencies were discussed with Messrs. Giesler and Luoma during the inspection on December 16, and 21, 1973 and it was our view that they were fully cognizant of the details associated with the violation.

The need for further corrective action with respect to evaluation of preoperational tests was discussed with Messrs. Giesler and Luoma following a subsequent inspection on February 6, 1974. We believe that the corrective action described in your letter of February 8, 1974, should resolve our concerns in this area. We will examine these matters further during a subsequent inspection.

Sincerely yours,

James G. Keppler
Regional Director

cc: C. W. Giesler, Superintendent
Nuclear Power

bcc w/ltr dtd 2/20/74:
RO Chief, FS&EB
RO:HQ (4)
Licensing (4)
DR Central Files
RO Files
PDR
Local PDR
NSIC
DTIE
OGC, Beth, P-506A
R. Renfrow, GC (2)

CB

WISCONSIN PUBLIC SERVICE CORPORATION

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

February 20, 1974

U. S. Atomic Energy Commission
Directorate of Regulatory Operations
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attention: Mr. James G. Keppler
Regional Director

Dear Sir:

Reference: Docket 50-305
Letter from Mr. J. G. Keppler to Mr. E. W. James
Dated January 28, 1974, transmitting ROIR 050-305/73-31

This response is submitted in answer to the apparent violation of AEC Regulation indicated and identified in Regulatory Operations Inspection Report 050-305/73-31.

The activities that appear to be in violation of an AEC Regulation as identified below are in reference to 10 CFR 50, Appendix B, Criteria XVI.

1. Item 7b

The inspector indicated that several deficiencies were identified in three pre-operational tests which were not addressed to in the test summary. The detailed report (050-305/73-31) is so vague and lacking of specifics that it is difficult to determine which items in the pre-operational test were judged to be deficiencies. The test procedures are prepared with the latest information available and this information is then interpreted by the test procedure writer. The purpose of the procedure, as we see it, is to have a documented guide in the performance of the test, but we also recognize that one of the prime purposes for the test is to determine whether the equipment or system will perform properly and in accordance with design specifications. If it comes about that something cannot be performed the way the procedure says it should, it does not necessarily mean that there is a deficiency; it may be that the writer's interpretation of how it should work is not correct. The system or equipment will still function as designed.

There were several notes and comments entered into the three procedures which will be discussed below. It may be that some of these were considered to be deficiencies. They are discussed herein.

PT-FH-05 Fuel Transfer System Functional Test

a. The handling tool operates as designed. Operations wants to use a scale in line with the tool; this makes the tool too long. The tool will be machined for use with a scale; but we believe that this is a change in operational procedure and not a design deficiency.

b. There is a single limit switch on the conveyor car. It was decided to determine what happens should the limit switch fail. This was done by bypassing the switch and the conveyor car undercarriage chain was damaged which was subsequently repaired prior to commencing the test. We do not believe this to be a deficiency.

c. A note was entered into the procedure, that a special tool should be built for remote unbolting. This will be done by WPS but we believe that the work can be done, has been done by others, without the special tool and, therefore, is not a deficiency.

PT-FH-06 Manipulator Crane and RCC Change Fixture Functional Test

a. This procedure uncovered several operating procedural changes and items which we do not believe were deficiencies, since the purpose of the test was to uncover such items as misalignment.

b. Deficiency Report 153 was issued against this procedure and test. The report noted that a cable for remote operation of RCC change fixture carriage car strips and cable and clamp stops were missing. These were covered by equipment transfer deficiency, therefore, already reported and documented in the master test file. This item has since been corrected.

PT-FH-07 Manipulator Crane Indexing

a. Several notes were made regarding operation of the manipulator crane indexing and suggested changes to the operating procedure. We do not believe these are design deficiencies.

b. There is a record of vendor repair work in the test file which documents any and all changes which were made in the field during the testing (indexing).

We have selected items which were noted as notes or comments in the procedures and which the inspector questioned during his review of the procedures. Without having specific items identified so that we can address ourselves to them, we do not feel that we are in violation of Criteria XVI and there were no conditions adverse to quality identified, since there is ample documentation of the events that occurred during the performance of the tests.

Sincerely,

E. W. James
Senior Vice President
Power Generation & Engineering

EWJ:sna

cc - Dr. D. F. Knuth