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# WISCONSIN PUBLIC SERVICE CORPORATION



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

September 19, 1980

Mr. J. G. Keppler, Regional Director  
Office of Inspection & Enforcement  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
IE Bulletin 80-20; Failures of Westinghouse Type  
W-2 Spring Return to Neutral Control Switches

In answer to IE Bulletin No. 80-20, and the recommended actions discussed therein, the following response is submitted. Numbering is consistent with the referenced bulletin.

1. We have determined that Westinghouse Type W-2 control switches with spring return to neutral position are used in safety-related applications at KNPP. A total of 27 (twenty-seven) W-2 switches are used in safety-related applications in the following systems:
  - 4150 V Supply & Distribution
  - Diesel Generators
  - Component Cooling
  - Containment Spray
  - Residual Heat Removal
  - Safety Injection
  - Service Water
  - Reactor Building Vent
  - Feedwater & Auxiliary Feedwater
2. To date, a continuity check on all Westinghouse Type W-2 switches used in safety-related applications has been performed 3 (three) times - once within ten days of the receipt of the referenced bulletin, and once each fourteen days thereafter - with no failures.

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A continuity check "after each manipulation of the switch from its neutral position" is considered unwarranted for the following reasons. First, a failure of the type described in the referenced bulletin has not occurred at KNPP since the fall of 1976. Previous to that time, several failures of a similar nature had been observed and reported. Our investigation revealed correct operation is to allow the switch to snap back to the neutral position. No failures have been noted since the defective switches were replaced and the operators trained in the correct use of the switch.

Second, a majority of the Westinghouse Type W-2 switches are manipulated only during the monthly surveillance testing to demonstrate equipment (and switch) operability. A continuity check every fourteen days is considered sufficient redundancy to verify switch performance.

Third, procedures dictate that the operators verify, by safeguards status lights and/or annunciation, proper equipment actuation sequence. The safeguards status lights act in a manner similar to annunciation as an active alert to the operator that a piece of equipment has failed to activate when called upon during an SI or blackout sequence.

3. By October 10, 1980 24 (twenty-four) of the 27 (twenty-seven) Westinghouse Type W-2 switches identified as having safety-related applications are expected to have modifications completed which will continuously indicate contact continuity through the position indicator lights. The three remaining switches for 1A auxiliary feedwater (AFW) pump, 1B AFW pump, and main steam to turbine-driven AFW pump, have been partially modified. Each of these switches has two sets of contacts controlling auto start of the designated AFW pump and its corresponding lube oil pump. Modifications on these three switches have been made to indicate contact continuity for the AFW pump auto start circuit.

Modification of the second set of contacts on each switch (for the lube oil pumps) will require the installation of status lights on the control board. These final modifications will be accomplished by the completion of the 1981 refueling outage.

Continuity checks on these three switches will be continued until modifications are complete.

The system review design change preparation, drawing revision, and preparation of this report involved approximately 200 (two hundred) manhours. Implementation of the DCR actions are expected to require approximately 240 (two hundred forty) manhours.

Very truly yours,

*E. R. Mathews*

E. R. Mathews, Vice President  
Power Supply & Engineering

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cc - Mr. Robert Nelson, NRC Resident Inspector  
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