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EVERS, K.H. Wisconsin Public Service Corp.
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SUBJECT: Responds to NRC 900801 ltr re violations noted in Insp Rept 50-305/90-11.

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August 31, 1990

10 CFR 2.201(a)

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Inspection Report 50-305/90-011(DRS)

Reference 1) Letter from H. J. Miller (NRC) to K. H. Evers (WPSC) dated
August 1, 1990.

The attachment to this letter provides our thirty-day written response to the
Notice of Violation identified in Reference 1.

Sincerely,

A handwritten signature in cursive script that reads "K. H. Evers".

K. H. Evers
Manager-Nuclear Power

DSN/mjm

Attach.

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

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PDR ADDCK 05000301
R PDC

Handwritten initials or a signature, possibly "TE01" with "11" below it.

Attachment 1

To

Letter From K. H. Evers (WPSC) To Document Control Desk (NRC)

Dated

August 31, 1990

Notice of Violation

As a result of the inspection conducted on June 4 through 8, and June 18 through 22, 1990, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1990), the following violation was identified:

10 CFR 50, Appendix B, Criterion XII, as implemented by the Wisconsin Public Service Corporation, "Operational Quality Assurance Program Description", Section 12, Revision 8b, requires that measures be established to assure that tools, gauges, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits.

Contrary to the above:

- a. The Measuring and Test Equipment (M&TE) Program, ACD 7.2, "Measuring and Test Equipment", Revision I, did not address retired (lost, worn-out, or damaged beyond repair) M&TE. As a result, an Ashcroft pneumatic calibrator was used during completion of two surveillance procedures, eleven instrumentation and control procedures, and two work requests, without performing a use history evaluation after the pneumatic calibrator was discovered lost prior to the next scheduled calibration (305/90011-01A).
- b. The acceptance criteria identified in ICP 82B.16, "ICE-Fluke 8050A Digital Multimeters", Revision C, for the Ohms and ac Volts scales did not agree with the vendor identified specifications. As a result, six Fluke instruments were calibrated in a non-conservative direction for these scales (305/90011-01B).
- c. A model 838 Biddle Megger Test Set, ID 92043, was found out-of-tolerance and resulted in NCR 89-191 to evaluate retesting of the equipment checked with this M&TE. However, there was no documented evidence that a review or a use history evaluation was performed. (305/90011-01C).

This is a Severity Level IV violation (Supplement 1).

WPSC Response

Wisconsin Public Service Corporation (WPSC) acknowledges the fact that weaknesses exist in the program for control and calibration of Measuring and Test Equipment (M&TE). WPSC took prompt action to address each of the individual examples of instrumentation calibration concerns identified by the NRC inspection team. This resulted in a prompt resolution of the concerns and the inspection team concluded that "there was a significant weakness in the accuracy and proper control of M&TE; however no safety significant problems were identified."

Item (a)

We have reviewed the NRC concerns and have agreed that improvements are needed in the area of M&TE control. The Measuring and Test Equipment (M&TE) Administrative Control Directive (ACD 7.2) will be reviewed and revised as necessary to ensure that retired and out of specification M&TE is addressed. We expect ACD 7.2 to be revised as necessary to address this concern by December 31, 1990.

Item (b)

The acceptance criteria of ICP 82B.16 entitled "ICE-Fluke 8050A Digital Multimeters" did not agree with the vendor identified specification. When identified an investigation was immediately conducted to determine if the affected test instrument had been used to calibrate any safety-related equipment for the ranges in question. The results of the investigation found that no safety-

related equipment had been calibrated using these instruments. The instruments had been used for the affected ranges on the rod position indication system. As mentioned in the NRC report:

This small error did not have an affect on the overall performance of the rod position system, which is a QA-2 non-safety related system. The licensee tagged all the affected test instruments with a "do not use the Resistance on AC voltage range" sticker until the affected instruments could be recalibrated.

ICP 82B.16 has been reviewed and revised as necessary to address this concern.

Item (c)

A model 838 Biddle Meggar test set, ID 92043, was found out-of-tolerance and resulted in NCR 89-191 to evaluate retesting of the equipment checked with this M&TE. The NRC report concluded that there was no documented evidence that a review or a use history evaluation was performed. Upon identification of this concern WPSC immediately initiated a review which indicated that M&TE was within acceptable limits for the equipment on which the procedures were performed.

In an effort to resolve the concern regarding the control, calibration, and history evaluation for instruments and other M&TE used in activities affecting quality, WPSC is evaluating the entire M&TE control process. Although the specific improvements that will be implemented have not yet been determined, appropriate resources will be dedicated to ensure a timely evaluation which will result in specific recommendations. It is anticipated that this evaluation and a schedule for implementation will be completed by March 1, 1991.