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SUBJECT: Responds to NRC 901221 ltr re violations noted in Insp Rept
 50-305/90-20 on 901021-1130. Corrective actions: plant
 manager to hold meetings to review event & written procedure
 being developed.

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January 21, 1991

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
Notice of Violation

Reference 1) Letter from R.C. Knop (NRC) to C.R. Steinhardt (WPSC) dated
December 21, 1990 (Inspection Report 90-020).

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

Sincerely,

for K. H. Evers
Manager-Nuclear Power

DSN/jms

Attach.

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

LIC\NRC\N455

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Attachment to Letter

From

K. H. Evers (WPSC)

To

Document Control Desk (NRC)

Dated

January 21, 1991

Notice of Violation

Attachment to January 21, 1991 Letter

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

NOTICE OF VIOLATION

NRC Violation

As a result of the inspection conducted from October 21 through November 30, 1990, and in accordance with the "General Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the following violation was identified:

Kewaunee Nuclear Power Plant (KNPP) Technical Specification 6.8 requires that activities affecting safety shall be described by written procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures. Additionally, the Wisconsin Public Service Corporation Operational Quality Assurance Program requires that corrective maintenance affecting safety related functions of nuclear power plant systems shall be initiated in accordance with a formal work request.

Contrary to the above, on November 14, 1990, corrective maintenance on the 1A Emergency Diesel Generator Safety Injection Load Sequencer was performed without the use of a procedure, and without a formal work request having been implemented to control the maintenance activity. The failure to use a procedure to guide the corrective maintenance, combined with the failure to formally control the work, resulted in the unintended automatic actuation of engineered safety feature equipment.

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

WPSC Response

Wisconsin Public Service Corporation (WPSC) has reviewed the Nuclear Regulatory Commission's (NRC's) concerns and agrees that the work control process needs improvement. WPSC has been successful in the past by providing workers with a sense of ownership and responsibility for the tasks that they perform. This in turn has led to the highly skilled, stable, and experienced work force that is responsible for Kewaunee's successful operation. We recognize the need however for more formally controlling the work process when the work being performed becomes complex and non-routine. Therefore the following actions will be taken:

- The Plant Manager will be holding meetings with the appropriate plant personnel to review this event. At the meeting, he will emphasize the need for thorough job planning prior to commencing work on equipment that can affect plant safety or reliability. He will also address the importance of communications and of understanding the scope of an equipment problem prior to taking corrective actions.

- To address the particular event described in the violation, a written procedure is being developed which will enable maintenance personnel to troubleshoot problems with the load sequencer without requiring a start of the diesel generator. The procedure will provide for resetting and stepping through the sequencer without the diesel running. This procedure will reduce the potential for inadvertently starting ESF components during load sequencer troubleshooting. This procedure is expected to be written and available for implementation by January 31, 1991.

LIC\NRC\N455