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SUBJECT: Provides supplemental response to violations noted in Insp
 Rept 50-305/91-007.Reorganized engineering organization.
 Administrative Control Directive 5.4, "Work Requests,"
 revised.

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July 18, 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
Supplemental Information to Inspection Report 50-305/91-007 (DRP)

- References: 1) Letter from K.H. Evers (WPSC) to Document Control Desk (NRC) dated June 17, 1991.
- 2) Letter from E.G. Greenman (NRC) to K.H. Evers (WPSC) dated May 10, 1991.

In Reference 1 Wisconsin Public Service Corporation (WPSC) provided our response to violations issued in the inspection report transmitted to WPSC (Reference 2). Subsequent to submitting the response we have recognized that we may not have fully addressed the issues/concerns stated in the cover letter of Reference 2. In addition to transmitting the notice of violation, the cover letter of reference 2 stated "More significantly, supervisory, technical, and management personnel who performed post activity reviews of these maintenance and testing actions also failed to identify the nonconforming condition and to initiate formal corrective actions to resolve them".

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In an effort to increase the technical/engineering expertise associated with the technical review process for work activities, WPSC recently reorganized the engineering organization at the Kewaunee Nuclear Power Plant (KNPP). Engineering personnel were reassigned whereby departments such as maintenance and instrument & control would have engineering resources available within the department to assess and review engineering/technical issues. Previously, engineering expertise to support plant maintenance was primarily contained within a separate department (Technical Support Group).

Administrative Control Directive (ACD) 5.4 entitled, "Work Requests" has been revised to designate the Departmental Engineer/Supervisor as one of the responsible individuals to perform the technical review of work requests. WPSC believes that utilizing the engineering personnel in the affected group provides for a technically qualified review of work activities. This change should assist in identifying non-conforming conditions and to initiate formal corrective actions to resolve them. In addition these engineering resources are used to develop new procedures and revise existing procedures.

An additional concern expressed in reference 2 that warrants further clarification is the concern that the resetting of valve SD1A5 lift setpoint to 1130 psig constituted a change to the facility as described in the USAR without performing a safety evaluation as required by 10 CFR 50.59. As required by ACD 1.12 entitled "Surveillance Procedures" a Surveillance Procedure Exception Report (SPER) shall be written if a problem or out of acceptable tolerance condition is encountered during the surveillance test. In a separate section, ACD 1.12 requires that temporary changes which alter the intent of the procedure shall receive Plant Operations Review Committee (PORC) review and Plant Manager approval prior to implementation. Alterations of acceptance criteria are considered changes of intent.

ACD 1.12 does not provide clear guidance on how to address out of tolerance conditions that cannot be returned to within procedural acceptance criteria. In the case referenced in the inspection report, a SPER was initiated to document the as-left value of 1130 psig. The reviewer documented on the SPER his basis for concluding that no safety significance existed. No temporary change (i.e., markup) was made to the procedure therefore the requirements regarding PORC review were not well defined.

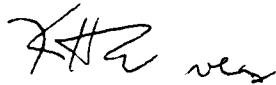
Processing of a SPER alone is not sufficient if the issue involves a change of intent. PORC review and Plant Manager approval should have been required prior to accepting the as-left value. ACD 1.12 will be revised to clearly define the requirements regarding PORC review of a change of intent. The revision will be completed by August 30, 1991.

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In addition to the changes to the ACD, the Plant Manager will generate a memorandum to appropriate personnel emphasizing the fact that PORC review is required in these type of situations. The memo will also address personnel responsibilities for incident report initiation and emphasize the need for supervisory, technical and management personnel to review work activities to ensure nonconforming conditions are properly resolved. This memo will be issued by August 30, 1991.

This information supplements the corrective actions already identified in Reference 1. If you have any further questions or concerns please contact me or a member of my staff.

Sincerely,



K. H. Evers
Manager-Nuclear Power

DSN/mjm

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

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