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 EVERS, K.H. Wisconsin Public Service Corp.  
 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 910708 ltr re deviations/open items noted in  
 Insp Rept 50-305/91-13. Corrective actions: Operations  
 Engineering Instruction OEI-7 re documentation program will  
 be revised prior to issuance of future EOP revs.

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August 7, 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  
Response to Inspection Report 91-013

Reference: Letter From Geoffrey C. Wright (NRC) to K H Evers (WPSC), dated  
July 8, 1991.

In the reference, the Nuclear Regulatory Commission (NRC) transmitted to Wisconsin Public Service Corporation (WPSC) the results of a routine inspection of Kewaunee's Emergency Operating Procedures. The inspection identified 1 deviation and 2 open items. The attachment to this letter provides WPSC's response to these items.

Sincerely,

A handwritten signature in dark ink, appearing to read "KHE" followed by a flourish.

K. H. Evers  
Manager-Nuclear Power

TJW/mjm  
Attach.

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

LIC\NRC\N501

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Attachment

To

Letter from K H Evers (WPSC) to Document Control Desk (NRC)

Dated

August 7, 1991

Re:

Inspection Report 91-013

### NOTICE OF DEVIATION

As a result of the inspection conducted on June 3-20, 1991, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1991) (Enforcement Policy) the following deviation was identified:

By letter dated December 13, 1989, from C.R. Steinhardt (WPSC) to NRC, the licensee responded to Open Item No. 305/89012-01. In the response, the licensee committed to complete step deviation documentation for the EOPs by June 1990. Further, commitments in the original PGP submittals, specifically a letter dated December 28, 1983, from C. W. Giesler (WPSC) to D.G. Eisenhut (NRC), stated in part that the completed step documentation would be maintained as a source document to assist in the EOP revision, review, and approval process.

Contrary to the above, the licensee failed to meet these commitments as indicated by less than half of the EOPs having complete step document files including review and approval as of June 1991, and the existing documentation reflected the 1989 EOP revision which was not consistent with the current EOPs implemented in May 1991.

#### Wisconsin Public Service Corporation (WPSC's) Response

Prior to the NRC's inspection of Kewaunee's emergency operating procedures (EOPs) in 1989, WPSC did not believe that the step deviation document needed to be maintained as a living document. During the inspection, WPSC recognized the NRC's concern and subsequently committed, in our December 13, 1989 letter, to maintain the document as a living document. The step deviation document for the 1989 revision to the EOP's was initially drafted in August of 1989. The document was revised again in April of 1990 to reflect the 1990 EOP revision. However due to the scope of the changes made in the 1989 revision, Kewaunee Plant management decided that the step deviation document should be independently reviewed prior

to final approval. The independent review turned out to be significantly more time consuming than originally anticipated and resulted in the delay. The independent review was subsequently completed on June 25, 1991.

The purpose of the step deviation document is to assure that deviations from the generic EOPs are technically justified. Although WPSC does not plan on providing a step deviation document for the current revision of the EOPs, we have the utmost confidence that the revision is technically sound. We base this conclusion on the following:

1. Prior to issuing the current revision of the EOPs, it was independently reviewed to ensure that none of the changes resulted in an unreviewed safety question.
2. The type of changes made for the 1991 revision to the EOPs were not likely to result in technical deviation from generic EOPs. These changes included:
  - a. changes in formatting,
  - b. editorial changes,
  - c. changes to reflect completion of Kewaunee's Integrated Plant Emergency Operating Procedure Setpoint Document,
  - d. changes to reflect plant specific modifications.

3. A Multi Disciplinary Review team has completed its review of all but the function restoration guidelines (FRGs) and is in the process of reviewing the FRGs. To date, no technical inadequacies have been found.

Based on the non-technical nature of the changes made to the EOPs and on the extensive review these changes have received, there is no reason to doubt the technical adequacy of the current revision.

Since the current revision of the EOPs is technically adequate, a step deviation document for the current revision should not be required. Instead WPSC proposes to update the step deviation document with the next revision of the EOPs, scheduled for May of 1992.

Document Control Desk  
August 7, 1991  
Attachment 1, Page 4

NRC Open Item

Operations Engineering Instruction OEI-7, "IPEOP Step Documentation Program," provided guidance for the preparation of the step document files; however, it lacked guidance for controlling the document to meet the 1983 commitment. This issue will be tracked as an Open Item (304/91013-02a(DRS)).

WPS Response

To ensure that the step deviation document is revised prior to issuance of future EOP revisions, Operations Engineering Instruction-7 (OEI-7) will be revised. The revision will require completion of the step deviation document prior to issuing a new revision to the EOPs. OEI-7 will be revised by September 30, 1991.

Document Control Desk  
August 7, 1991  
Attachment 1, Page 5

NRC Open Item

The EOP Writers Guide is used to develop and maintain the EOPs. While the deficiencies in the Kewaunee EOP Writer's Manual identified by the NRC in the 1989 team inspection and the 1990 Safety Evaluation appeared to have been resolved by the December 1990 revision to the Writer's Manual, the document and its revisions were not formally controlled as a quality record. Formal control and maintenance of the Writer's Manual is necessary so that it is available to those who use it, such as reviewers and trainers. The licensee concurred with the inspector and planned to revise the guidance for preparing the Writer's Manual contained in Administrative Control Directive ACD 4.15, "Writer's Manual for Emergency Operating Procedures." This issue will be tracked as an Open Item (305/91013-2b(DRS)).

WPS Response

As stated in the inspection report WPSC will be revising ACD 4.15 to include the Writer's Guide. The revision is scheduled to be issued by September 30, 1991.

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