

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

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 AUTH.NAME AUTHOR AFFILIATION  
 CHROCK,C.A. Wisconsin Public Service Corp.  
 RECIP.NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 920131 ltr re violations noted in Insp Rept  
 50-305/91-24. Corrective actions: steam exclusion doors at  
 plant posted w/signs stating that doors should not be  
 blocked open w/o shift supervisor permission.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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March 2, 1992

10CFR2.201

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 91-024

Reference: Letter to C. A. Schrock (WPSC) From R. C. Knop (NRC) Dated  
January 31, 1992

The reference provided Wisconsin Public Service Corporation (WPSC) with the results of a routine inspection conducted by Messrs. P I Castleman and K G O'Brien of the NRC. Attached to this letter is our response to the notice of violation contained in the reference.

If you have any questions concerning this matter, please contact a member of my staff.

Sincerely,

*C. A. Schrock*

C. A. Schrock  
Manager-Nuclear Engineering

TJW/car

Attach.

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

LIC\NRC\N2.WP

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PDR ADOCK 05000305  
G PDR

*TEC 1*

Attachment

To

Letter from C A Schrock (WPSC) to Document Control Desk (NRC)

Dated

March 2, 1992

Re:

Inspection Report 91-024

Document Control Desk  
March 2, 1992  
Attachment 1, Page 1

Notice of Violation

Kewaunee Nuclear Power Plant (KNPP) Technical Specification (TS) 6.8.I requires that activities affecting safety shall be described by written procedures of a type appropriate to the circumstances.

Contrary to the above, on December 3, 1991, the Turbine Driven Auxiliary Feedwater Pump (TDAFWP) room steam exclusion doors were blocked open from 1058 to 1115 hours, defeating their steam exclusion function. The root cause of the doors being blocked open was the licensee's failure to establish procedural controls to ensure that the steam exclusion boundary would not be defeated.

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

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

Wisconsin Public Service Corporation concurs that this event was caused by a lack of administrative guidance. To address this issue, steam exclusion doors in the plant have been posted with signs stating that the doors should not be blocked open without the Shift Supervisor's permission. This action addresses the concern identified by the inspection report.

In late 1972, towards the end of construction of the Kewaunee plant, the NRC first identified concerns with high energy line breaks (HELB) outside of containment. The issue continued to evolve through the end of plant construction. Since the environmental consequences of a HELB outside of containment had not been addressed during initial plant design, the steam exclusion system had to be designed around existing equipment and systems. The evolving nature of the issue and the necessity to design around existing installation, have obfuscated the design assumptions and basis of the steam exclusion system. During early plant operation,

administrative guidance for removal of steam exclusion equipment from service was not developed; this in conjunction with lack of original design information has further hindered present day efforts.

To correct this, nuclear department personnel have begun to reconstruct the design basis for the steam exclusion system to support a safety system functional inspection (SSFI) scheduled for May, 1992. The SSFI will identify all steam exclusion boundaries and verify that the system can function as designed. After the SSFI has been completed, additional training will be provided to ensure personnel are cognizant of steam exclusion system requirements. These actions should prevent recurrence of this event. The SSFI is tentatively scheduled for completion in July of 1992. Training will be provided to personnel prior to January 1993.

#### Notice of Violation

KNPP TS 6.8.1 requires that written procedures shall be implemented. KNPP administrative control directive (ACD) 2.16, "Incident Report," requires that an incident report be prepared for any condition which is potentially reportable as an immediate notification per the requirements of 10CFR 50.72.

Contrary to the above, on December 3, 1991, the licensee failed to immediately initiate an incident report upon discovery that the TDAFWP room steam exclusion doors were blocked open, an event reportable to the NRC within one hour per 10CFR 50.72(b)(1)(ii)(B). This failure resulted in the required notification being made approximately 23 hours after the discovery of the doors being blocked open.

This is a Severity Level IV violation (Supplement I)

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

As stated in the previous discussion, the assumptions used to design the steam exclusion system are not well understood. Therefore when the control room personnel were made aware of the blocked doors, they did not understand the significance of the event. As a result, an incident report was not generated in a timely manner.

To prevent recurrence of this event, WPSC's response to this violation and the associated LER (LER 91-012) will be included in the operations department's required reading. Additional training will be provided to operation's personnel following the SSFI on the design basis of the steam exclusion system. The training is scheduled for completion prior to January 1993.