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 SCHROCK, C.A. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 920324 ltr re violations noted in Insp Rept
 50-305/92-03. Corrective actions: all control room alarm
 response sheets reviewed & inconsistencies between response
 sheets & existing procedure reconciled.

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WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

April 23, 1992

10 CFR 2.201

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
Reply to Notice of Violation 92-003-01

Reference: 1) Letter from R. C. Knop (NRC) to C. A. Schrock (WPSC) Dated
March 24, 1992

In the reference, the Nuclear Regulatory Commission (NRC) identified a violation concerning the manner in which Wisconsin Public Service Corporation controlled the alarm response sheets for the Kewaunee plant. Attachment 1 to this letter contains our response to this notice of violation. If you have any questions concerning this issue, please contact me or a member of my staff.

Sincerely,

A handwritten signature in cursive script that reads "C. A. Schrock".

C. A. Schrock
Manager - Nuclear Engineering

jac

Attach.

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

LIC\NRC\N17.WP

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ATTACHMENT 1

To

Letter from C. A. Schrock (WPSC)

To

Document Control Desk (NRC)

Re: Inspection Report 92-003

Document Control Desk
April 23, 1992
Attachment 1, Page 1

NRC Notice of Violation:

Kewaunee Nuclear Power Plant (KNPP) Technical Specification (TS) 6.8.1 requires that activities affecting safety shall be described by written procedures of a type appropriate to the circumstances. Additionally, KNPP Administrative Control Directive (ACD) 2.6, "Plant Procedures," requires that procedures which control safety related activities be designated as safety related, and that these procedures be reviewed by the Plant Operations Review Committee (PORC) and approved by the Plant Manager.

Contrary to the above, on February 29, 1992, it was determined that the licensee did not designate control room alarm response sheets which direct activities affecting safety as safety related procedures, and that these alarm response sheets did not receive PORC review and Plant Manager approval.

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

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

A typical alarm response sheet is provided in Attachment 2 to this letter. The sheet provides the operator with technical information and recommended action that can be taken in response to a particular alarm. WPSC has always considered the alarm response sheets as guidance and

not a procedure. For those actions which could be considered safety related, the alarm response sheets re-iterated the immediate action steps the operators are required to commit to memory and references the applicable procedure.

However, to address the concern identified in the inspection report, WPSC has taken the following actions:

1. All control room alarm response sheets were reviewed to determine which ones could be considered safety related.
2. Those sheets identified as safety related were reviewed to verify that none of the recommended action provided, if taken, would place the plant in an unsafe condition.
3. Inconsistencies between safety-related alarm response sheets and an existing procedure have been reconciled to ensure the operators are supplied with consistent instructions.
4. The safety-related alarm response sheets have been incorporated into the two-year review cycle for safety-related procedures. This will ensure PORC review and Plant Manager approval for the safety-related alarm response sheets.

ATTACHMENT 2

To

Letter from C. A. Schrock (WPSC)

To

Document Control Desk (NRC)

Dated

April 23, 1992

Re: Inspection Report 92-003

ANNUNCIATOR NUMBER 47019-43

SETPOINT See Below
SYSTEM RC-36
FLOW DWG. XK100-10
LOGIC DWG. E2040
S.E.R. PT. 820, 822
COMPUTER PT. NONE
FUNCT. DESC. NONE
OTHER E731, E2871

PZR
SAFETY
OPEN

COMMENTS: 1. ANNUNCIATOR IS ACTIVATED BY AN ACCELEROMETER MOUNTED ON EACH PRESSURIZER SAFETY VALVE. IF EITHER SAFETY VALVE OPENS THE ANNUNCIATOR WILL ALARM, WILL GET HIGH ALARM LIGHT ON ITS MODULE, AND WILL GET RED LIGHT FOR THAT SAFETY VALVE IN CONTROL ROOM.

THE DRAWER FOR THE ACCELEROMETERS IS LOCATED AT BOTTOM OF THE WEATHER CHARTS CABINET. THERE IS A MODULE FOR EACH SAFETY VALVE AT LEFT OF DRAWER AND A RESET BUTTON FOR EACH SAFETY AT THE EXTREME RIGHT.

TO CLEAR ANNUNCIATOR, HIGH ALARM LIGHT ON MODULE, AND RED LIGHT ON THE CONSOLE AFTER THE SAFETY VALVE CLOSSES, MUST PUSH RESET BUTTON ON RIGHT SIDE OF DRAWER.

2. IF A PRZ SAFETY HAS OPENED, THE RUPTURE DISC DOWNSTREAM OF THE VALVE HAS RUPTURED. THE PLANT MUST BE SHUT DOWN TO REPLACE THE DISC AND INSPECT THE SAFETY VALVE.

- RECOMMENDED ACTION: 1. IF LEAKAGE EXCEEDS THE CAPACITY OF THE CHARGING SYSTEM OR SAFETY INJECTION ACTUATION ON LOW RCS PRESSURE IS IMMINENT, THEN:
- a. MANUALLY INITIATE A REACTOR TRIP
 - b. MANUALLY INITIATE SAFETY INJECTION
 - c. GO TO E-0, REACTOR TRIP OR SAFETY INJECTION.
2. REFER TO A-RC-36D.

REVISION DATE 7-07-89