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SCHROCK,C.A. Wisconsin Public Service Corp.
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Commissioners (Post 750119)

SUBJECT: Forwards response to NRC 920518 ltr re violations noted in insp rept 50-305/92-010 on 920302-30.Corrective actions:new work request sys & independent review of safety-related work requests during plant refueling outages implemented.

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June 19, 1992

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U. S. Nuclear Regulatory Commission
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Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Reply to Notice of Violation

Reference: Letter from E. G. Greenman (NRC) to C. R. Steinhardt (WPSC), dated May 18, 1992 transmitting Notice of Violation

In the reference, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of a special inspection conducted at the Kewaunee Nuclear Power Plant from March 2 through March 30, 1992 and an investigation conducted from December 26, 1990 through January 29, 1992. The inspection included a review of the circumstances surrounding the inoperability of a pressurizer surge line rupture restraint and actions taken in response to an emergency diesel generator exciter cabinet discovered not installed in accordance with its design.

The attachment to this letter provides a response to the Notice of Violation (NOV) issued by the NRC and WPSC's response to additional concerns identified in the referenced cover letter.

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

Sincerely,

C. A. Schrock
Manager - Nuclear Engineering

SLB\jac

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

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ATTACHMENT 1

To

Letter from C. A. Schrock (WPSC)

To

Document Control Desk (NRC)

June 19, 1992

Re: Inspection Report 92-010

NRC NOTICE OF VIOLATION

During an NRC inspection conducted on March 2 through March 30, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violations are listed below:

10 CFR Part 50, Appendix B, Criterion V states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings. Also, the instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

A. Contrary to the above, Kewaunee Nuclear Power Plant Administrative Control Directive 5.4, "Work Request," Revision M, dated January 25, 1989, was not of a type appropriate to the circumstances. Specifically, the procedure failed to contain requirements to ensure that licensee supervisory personnel reviewed and concurred with completed work requests in a timely manner for activities affecting quality.

B. Contrary to the above, on March 16, 1989, the licensee failed to include appropriate quantitative or qualitative acceptance criteria for determining that an important activity was satisfactorily accomplished. Specifically, Maintenance Work Request 44071 failed to include baseplate anchor bolt torque acceptance criteria for pressurizer surge line pipe whip restraint 134-6.

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

Wisconsin Public Service Corporation's (WPSC) Response to Item A

As presented to the NRC during the April 16, 1992 Enforcement Conference, our own event investigation identified the untimely review of work request 4407I as a probable contributor in the failure to identify the inoperable condition of restraint 134-6 during the 1989 refueling

outage. The reason for this untimely review was that in 1989, the practice of delaying work request reviews until after the completion of plant outages was considered acceptable.

The untimely review of work requests, in addition to other weaknesses in our work controls, had been self-identified prior to the issues surrounding the rupture restraint. Even in 1989, a number of improvements to the work control system were being evaluated to address these weaknesses.

In fact, a new electronic work request tracking system was made partially operable in February of 1992. The revised work request procedure, Administrative Control Directive 5.4, has been streamlined by placing some activities in a parallel rather than a sequential review mode and the number of sequential signatures has been reduced by 30 percent. During initial training conducted on the new work request system in January of 1992, maintenance department management conveyed their expectations that work requests under the revised procedure be reviewed in a timely manner and prior to the work being considered complete. WPSC will also provide ongoing training to maintenance personnel, including contractors, on the expectations of timely work request reviews.

As a result of our review of the issues surrounding the surge line restraint event, an independent review of all work requests that have been authorized to start, but not notified for completion, was completed prior to startup from the 1992 refueling outage. This review paid special attention to those items less obvious to the Operations personnel such as inservice inspection

activities and work requests associated with engineering and other inspection activities which could result in the identification of degraded equipment. To avoid further violations, this independent review of safety-related work requests will be proceduralized. The on-shift Shift Technical Advisors are removed from shift during plant refueling outages and will be assigned to work with the outage coordinator and perform this review. In order to assist in the rapid transition to the new work request system, all work requests governed by the old process, with work scope completed, will be closed out prior to the beginning of the 1993 refueling outage.

We believe that full implementation of the new work request system and the independent review of safety-related work requests during plant refueling outages addresses the concern of timely work request reviews identified in this NOV. This, in turn, will result in an enhanced ability to identify and correct nonconforming conditions discovered during the course of work in a timely manner.

WPSC's Response to Item B

As presented to the NRC during the April 16, 1992 Enforcement Conference, our own event investigation identified unclear work instructions for work request 44071 as a possible contributor to the failure to identify the inoperable condition of restraint 134-6 during the 1989 refueling outage. The acceptance criteria for work request 44071 was unclear due to a change

in work scope that resulted in difficulty determining what work remained to be completed, and the work instructions provided by the initiating engineer were not clear, i.e., the work instructions stated "verify torques" versus "verify torques and tighten as appropriate." The reason for this is that in 1989 there was a lack of clear procedural guidance for the initiator to provide work instructions on the work request.

As discussed in response to Item A, an electronic work request tracking system which had been under development since 1989, was made partially operational in February of 1992. Under the new work request system, the work instructions' section is required to be completed by the Group Supervisor using guidance found in the revised procedure. The initial training conducted on the new work request system addressed management's expectations regarding quality of work instructions, change of scope, retest requirements and documentation details. To improve the detail and quality of the work instructions, a new block was created on the work request form to key the use of written instructions and procedures. We believe that the implementation of the new work request system addresses the concerns identified in this NOV.

Additional Concerns Identified by the NRC

The cover letter for "Notice of Violation" (Inspection Report No. 50-305/92010 and Investigation Report NO. 3-90-018) states in part:

> Your corrective actions notwithstanding, the NRC is concerned over these matters because the lack of effective formal controls over your maintenance process establishes an environment in which conditions adverse to quality will not necessarily receive effective, timely, technical and safety review, resulting in the failure of significant safety information to come to management attention. Thus, conditions not resulting in immediate, obvious inoperability can be overlooked. We are also concerned that these weaknesses contributed to two missed opportunities, during the 1989 refueling outage and during a June 1989 maintenance shutdown, to identify the full extent of the restraint's deficiencies and to repair them. Associated with these weaknesses was your staff's apparent insensitivity to the need to make operability determinations when confronted with degraded or nonconforming conditions. These weaknesses were further demonstrated by the failure to evaluate and make a prompt operability determination for the 1A emergency diesel generator when its associated exciter cabinet was discovered in a degraded condition in March 1992.

WPSC's Response

In our analysis of the pressurizer surge line event, we concluded that there were several contributors to the failure to identify the inoperable condition of restraint 134-6 during the 1989 outage, including failure to complete an as-built reconciliation of this restraint at the time of initial plant construction, and weaknesses in our work practices for resolution of identified

discrepant conditions. We recognize that these weaknesses caused us to miss opportunities for earlier discovery of the inoperable condition of the restraint.

In particular, we recognize the past weakness of untimely reviews of work requests, which was complicated by inconsistent standards of documentation. The implementation of a new electronic work request tracking system was started in February of 1992 which we believe takes a major step forward in addressing these concerns. This change was implemented after years of study and preparation; we feel we must allow some time to assess its success.

With regard to the need to make operability determinations when confronted with degraded or nonconforming conditions, we agree that there was a weakness in our past practice that allowed deferral of operability determinations pending analysis of the discrepant condition. Additional rigor will be employed to ensure timely and consistent operability determinations are made. The guidance contained in Generic Letter 91-18 is currently under review and procedures will be developed or modified as appropriate to address this concern.