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Form AEC-93	3 (Rev. May 14, 1947) AECM 0240	Note and return.	For signature.	For Information,
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G. Fiorelli IE:III		Att	ached is a copy	of licensee's reply	dated June 9, 1975,
		to IE Bulletin /5-06.			
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WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

June 9, 1975

U. S. Nuclear Regulatory Commission Office of Inspection and Enforcement Region III 799 Roosevelt Road Glen Ellyn, Illinois 60137

Attention: Mr. James Keppler Regional Director

Dear Mr. Keppler:

Reference: Docket 50-305 Operating License DPR-43 Letter from Mr. J. G. Keppler to Mr. E. W. James dated May 30, 1975

The referenced letter transmitted IE Bulletin No. 75-06, "Defective Westinghouse Type OT-2 Control Switches," which required action by Wisconsin Public Service Corporation.

The following addresses the action taken in regards to OT-2

switches:

On April 16, 1975, Westinghouse transmitted for our information and use Westinghouse Nuclear Service Division Technical Bulletin 75-4 relative to Westinghouse Type OT-2 control switches. Following receipt of this Westinghouse bulletin the use and failure history of the OT-2 switches was investigated by our staff.

Westinghouse OT-2 control switches are used extensively in the Kewaunee Nuclear Power Plant. The use of these switches includes the majority of safety related and non-safety related systems for valve and small motor control.

The defective switches were found at the Sequoyah Station which is currently under construction. The defects appeared to be related to initial manufacturing process problems with the "Sequoyah" switches. The defects did not appear to be wear or use related.

All control switches installed at the Kewaunee Nuclear Power Plant were verified to be functioning properly during initial plant testing in the following manner:

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- 1. Following completion of all terminations on a switch the construction tradesmen check switch operation. This check was not documented in all cases; however, it was a consistent practice due to union agreements and trade practices.
- 2. The proper operations of the switch contacts were verified by a "Construction Test" as specified in Section 13.11 of the FSAR. The verification was documented.
- 3. Proper operation of the switch contacts were verified a second time by the electrical "Preoperational Test" which documented that all operating modes functioned properly.
- 4. Proper operation of the switch was again verified by the system related "Preoperational Test" which functionally demonstrated correct operation.

During this test program defects in OT-2 switches were not discovered and failures of these switches to operate properly were not encountered.

The Kewaunee Plant has been in operation for in excess of one year, in which all safety related gear has been checked per the Technical Specification requirements in addition to normal operating equipment use. Again, failure of OT-2 switches has not been encountered.

Having documented proper operation of each safety related OT-2 switch during Construction and Preoperational Testing at least three times and performed the required surveillance testing during operation without encountering OT-2 switch failures, we believe that proper operation has been adequately demonstrated and documented; therefore, no additional action is warranted at this time.

Sincerely,

E. W. James

Senior Vice President Power Supply and Engineering

EWJ:sna

cc - Mr. Dwane Boyd