MEMO ROUTE SLIP
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TO (Name and unit)	INITIALS	DATE	REMARKS
IE Chief, FS&EB IE:HQ(4) Licensing(4) DR Central Files J. Rizzo, IE:HQ			Wisconsin Public Service Corporation Kewaunee 50-305
A/D for Info. Processing Region I Region II PDR Local PDR			
NSIC TIC OGC, Beth-P-506A R. Renfrow, GC(2)			

FROM (Name and unit)	REMARKS
G. Fiorelli IE:III	Attached is licensee's reply dated April 23, 1975, to IE Bulletins 75-04 and 75-04A.

PHONE NO.	DATE
	4-25-75

USE OTHER SIDE FOR ADDITIONAL REMARKS

GPO : 1971 O - 445-469

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WISCONSIN PUBLIC SERVICE CORPORATION

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

April 23, 1975

U. S. Nuclear Regulatory Commission
Directorate of Regulatory Operations
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attention: Mr. James G. Keppler
Regional Director

Dear Mr. Keppler:

Reference: Docket 50-305
Operating License DPR-43
Letter from Mr. Keppler to Mr. James
of April 3, 1975

The referenced letter transmitted IE Bulletins No. 75-04 and 75-04A requiring a review of certain of our activities as they may relate to the Browns Ferry Fire Incident.

In regards to IE Bulletin No. 75-04 the following responses are provided by item number:

1. Review your overall procedures and system for controlling construction activities that interface with reactor operating activities, with particular attention to the installation and testing of seals for electrical cables between compartments of the reactor building, e.g., control room to cable spreading room.

Response

All maintenance, modification and construction activities at the Kewaunee Nuclear Power Plant are controlled by an administrative system referred to as the "Maintenance Work Request." Prior to performance of work of any nature upon plant equipment the documentation required by the Maintenance Work Request (MWR) system is completed. (During emergency conditions this requirement is waved to expedite activities necessary for the safety of the public and the plant.) The required documentation and administrative processing includes:

(1) A review of the work to be performed by the originating supervisor to assure that the work is necessary.

(2) A review of the work to be performed by the Maintenance Coordinator to determine the requirements necessary to perform the work. Any special requirements are noted on the documentation package which comprises the MWR.

(3) A review of the work required and special requirements by the Maintenance or I&C Supervisor to assure that proper procedures are provided. Radiation Work Permits and necessary documentation to authorize changes are also acquired by this reviewer and added to the documentation package.

(4) A review by the Plant Performance Engineer (QA) to assure that the work is in conformance with the plant QA standards.

(5) Procedures required to perform the work are subject to PORC review in accordance with Section 6.0 of the Technical Specifications.

(6) Prior to initiation of the work the Shift Supervisor reviews the data package and performs the appropriate system alignments. The Shift Supervisor is responsible for assuring that the plant is in a safe configuration to perform the required work.

Prior to initiation of any work the above reviews assure an evaluation by at least two SRO's and possibly the PORC.

The particular seal design employed in the Kewaunee Plant is seal the electrical cables between the relay room (cable spreading), control room and remainder of the plant is described in 2. below. The installation of additional cables will be accomplished by core drilling the installed seal and resealing the installed new cable with RTV in a manner similar to the initial installation.

Leak tests are not considered necessary for the type of seal utilized at Kewaunee, although an inspection of the seal is performed and documented.

2. Review the design of floor and wall penetration seals, with particular attention to the flammability of materials.

Response

The barriers in the electrical penetrations at Kewaunee Nuclear Plant consist of RTV-124 used as dams with RTV-511 poured into the penetration to make the sealed barrier. This sealed barrier is spray coated with a fire resistant material, Dyna-Therm Flamemastic 71A. The removable plates underneath the control room consoles are spray coated with Dyna-Therm Flamemastic 71A.

Documentation exists in our QA file provided by the vendor which confirms that the RTV supplied to Kewaunee Nuclear Power Plant is a flame retardant product. The documentation indicates that the RTV material was flame tested in accordance with UL subject 94 Standard for flammability tests. The RTV material was classified as type SE-0 or a self-extinguishing rating. Materials classified as Type SE-0 must meet the following tests:

(1) Not have any specimens burn with flaming combustion for more than 10 seconds after each application of the test flame.

(2) Not have a total flaming combustion time exceeding 50 seconds for the 10 flame applications for each set of 5 specimens.

(3) Not have any specimens which burn with flaming or glowing combustion up to the holding clamp.

(4) Not have any specimens which drip flaming particles that ignite the dry absorbent surgical cotton located 12 inches below the test specimen.

(5) Not have any specimens with glowing combustion which:

a. Persists beyond 30 seconds after the second removal of the test flame.

b. Ignites dry absorbent surgical cotton beyond 10 seconds after the second removal of the test flame.

Documentation also exists describing the performance of the Flamemastic 71A coating. The Flamemastic coating has a fire resistant characteristic of no burn-through of a 1/16" coating after 15 minutes exposure to a propane torch. (The flame temperature of 2050°F and the torch distance of 2 inches.) Flamemastic will not propagate a fire, and surface non-flammability characteristics are superior.

3. Evaluate your procedures for the control of ignition sources which may be used for leak testing or other purposes in areas containing flammable materials.

Response

Ignition sources such as candles, matches, torches, etc., are not employed at the Kewaunee Nuclear Power Plant for leak testing in areas containing flammable materials.

Consistent with established WPS policy, the control of ignition sources is affected by the "Wisconsin Public Service Corporation Safety Rules" Section 5, Steam Plants. These rules require good housekeeping and vigilance in inspecting, detecting and correcting faults, defects, and failures of equipment or methods. The rules require a fire watch as necessary when burning or welding is in progress and utilization of insulation around critical or flammable equipment and the presence of fire extinguishing equipment. Other ignition sources are not employed at the Kewaunee Nuclear Power Plant in presence of flammable materials.

In regards to IE Bulletin No. 75-04A the following responses are provided by item number:

2. Review your policies and procedures relating to construction or maintenance and modification work to assure that activities which might affect the safety of a unit in operation, including the ability to shut down and cool the unit, are properly controlled. Your review should consider particularly your policy on deferring construction, maintenance or modification work on a unit until a shutdown period except for emergency maintenance vital to continued safe operation or safe shutdown of the unit.

   Response

   The response to IE Bulletin 75-04, Item 1, addresses our policy and procedure relating to maintenance or modification work performed at the Kewaunee Nuclear Power Plant. It is our practice to avoid activities which would disable one of the safeguard trains or components during normal operation although the Technical Specifications allow such activity for a specific period of time provided the redundant component or train is verified operable. Our policy is that "safety is first and foremost." No essential modifications and maintenance to safeguard equipment is normally deferred until unit shutdowns. On the other hand, maintenance and modification work which has no direct impact upon the safety system or overall plant safety is performed as soon as possible, including during plant operation to assure maximum plant operability.

   A recent plant staffing addition was the position of Maintenance Coordinator. A primary function of this position is to keep an on-going plan and program of maintenance work to be put into effect in case of an unplanned outage. This very action of planning allows maintenance work to be performed during the outage which otherwise would have to be performed during operation.

3. Review your policies and procedures to assure that for construction or modification and maintenance activities during plant operation, particular attention is given to the following areas:

   a. The degree of safety significance of affected and nearby cabling and piping.

   b. The use and control of combustible materials.

   c. The use and control of equipment that may be an ignition source.

   d. The assignment of personnel, knowledgeable of plant arrangement and plant operations, whose sole temporary responsibility is monitoring the safe performance of construction or maintenance and modification work, including attention to otherwise unattended areas adjacent to the work areas.

e. Provisions of installed or portable equipment to provide the monitoring personnel with prompt communication with the operating staff in the control room.

f. Provision of adequate fire prevention and fire suppression equipment, installed or portable, for the following locations:

(1) Areas where work is being performed.

(2) Areas where occurrence of a fire has high safety significance even though the probability of occurrence is relatively small.

g. Recognition that a fire, even one involving electrical equipment, may, if of sufficient intensity, require water as the ultimate suppression medium.

Response

A response will be provided by May 12, 1975.

4. Review your emergency procedures to assure that consideration for alternate methods for accomplishing an orderly plant shutdown and cooldown are provided in case of loss of normal and preferred alternative shutdown and cooldown systems for any reason (e.g., a fire). In this connection, assure that the minimum information necessary to assist the operators in such shutdown actions, the minimum protection system actions required (e.g., scram) and the spectrum of alternative paths available to the operators to supply cooling water and remove decay heat dependent on plant conditions are included in your emergency procedures.

Response

A response will be provided by May 12, 1975.

Very truly yours,

E. W. James
Senior Vice President
Power Generation & Engineering

EWJ:sna

cc - Mr. Dwane Boyd