

Central File

WISCONSIN PUBLIC SERVICE CORPORATION



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

October 13, 1978

*[Handwritten signature]*

Mr. James G. Keppler, Director  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Keppler:

Docket 50-305  
Operating License DPR-43  
I&E Inspection Report No. 50-305/78-10

On August 9, 1978, we responded to the findings of I&E Inspection Report No. 50-305/78-10 which contended that two items of non-compliance (deficiency) existed in the records associated with the in-service inspection program of the Kewaunee Plant. Your letter of September 8, 1978, requested that we provide additional information relative to the first item of that report. The following addresses each of the noted items of that report:

A specific requirement existed for documentation of ultrasonic testing couplant material in the In-service Inspection Procedure OPS-NSD-101. As stated in our letter of August 9, 1978, only one batch of couplant material was employed in the program performed last refueling. The completed data package describing the In-service Inspection Report for the refueling outage III-IV includes identification of the couplant material employed per the requirements of the procedure. Since only one couplant was employed for all inspections of the last refueling, the record is complete in accordance with the procedure requirement by including in the record the manufacture type and batch number of ultrasonic couplant. Future inspections will also record the couplant employed throughout the inspection. Should more than one couplant be utilized, the specific examinations performed with each couplant will be identified in accordance with the standard Westinghouse procedure.

Temperature monitoring was performed by the In-service Inspection personnel in the manner performed by Westinghouse at other facilities and Kewaunee during previous inspections. The purpose of having inspections performed by personnel certified as qualified inspectors is to assure that such requirements as temperature differential are intrinsic to the individual performing the inspection. Since the UT inspections of welds during an inspection program are repetitive

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procedures in which specific recording of conformance to intrinsic limitations does not materially add to the record, conformance to the required  $\Delta T$  between the weld under inspection and the calibration block has not been formally documented. This practice is not inconsistent with 10CFR50 Appendix B of the Regulations. Nevertheless, procedures for future inspections will include a statement identifying the allowed  $\Delta T$  for UT inspections.

The final report on the Cycle III-IV In-service Inspection includes documentation of the Technical Specification reference for each component examined. The required information was included in the record prior to acceptance by WPS.

In retrospect, the contended deficiency that recordkeeping requirements of 10CFR50 Appendix B Criteria XVII and the Kewaunee Plant Technical Specifications were not complied with appears to have been for the most part a misunderstanding of record status at the time of the inspection. The inspection was performed during two separate visits to the plant on April 24-26 and May 6, 1978. At the time of the inspections, the In-service Inspection Program was in progress with our contracted inspection organization, Westinghouse, performing the required activities. Westinghouse was performing the inspections in accordance with the approved inspection plan and detailed inspection procedures which included requirements for documentation of specific technical data per the ASME Boiler and Pressure Vessel Code. While Westinghouse is responsible for acquiring the technical data and assembling a report for the licensee, the responsibility for the record remains that of the licensee. Until such time as a designated employee or designated agent of WPS has accepted the results of an in-service inspection, the records should not be considered complete for the purpose of inspection of non-technical documentation requirements.

Very truly yours,

A handwritten signature in cursive script, appearing to read "E. W. James". Below the signature, the word "For" is written in a smaller, simpler script.

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

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