CENTRAL FILES

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

JUL 07 1978

Docket No. 50-305/78-10

Wisconsin Public Service
Corporation
ATTN: Mr. E. W. James
Senior Vice President
Power Generation and
Engineering
P. O. Box 1200
Green Bay, WI 54305

Gentlemen:

This refers to the inspection conducted by Messrs. C. C. Williams and K. D. Ward of this office on April 24-26 and May 6, 1978, of activities at the Kewuanee Nuclear Power Plant authorized by NRC Operating License No. DPR-43 and to the discussion of our findings with Mr. A. J. Ruege and other members of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as described in the enclosed Appendix A.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within thirty days of your receipt of this notice a written statement or explanation in reply, including for each item of non-compliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in

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the NRC's Public Document Room, except as follows. If the enclosures contain information that you or your contractors believe to be proprietary, you must apply in writing to this office, within twenty days of your receipt of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

R. F. Heishman, Chief
Reactor Construction and
Engineering Support Branch

Enclosures:
1. Appendix A, Notice of Violation
2. IE Inspection Report No. 50-305/78-10

cc w/encls:
Mr. C. Luoma, Plant Superintendent
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC

OFFICE▶	RIII	RIII	RIII	RIII	RIII	
SURNAME▶	Williams/bk	Ward KW	Danielson	Heishman	Choules	
DATE▶	7/3/78		7/5/78	7/6		

Appendix A

NOTICE OF VIOLATION

Wisconsin Public Service Corporation

Docket No. 50-305

Based on the inspection conducted on April 24-26 and May 6, 1978, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. These items are deficiencies.

1. Contrary to 10 CFR Part 50, Appendix B, Criteria XVII, and the Kewaunee Plant Technical Specifications Section 6.8, Administrative Control Directive No. 9.2 (Plant QA Records); the following record deficiencies were identified:

   a. The ultrasonic testing couplant material used during the test is not identified on the ultransonic test report forms; i.e., Westinghouse form No. 45336 (Report form); as is required by Article I-6100(b) of the ASME Section XI.

   b. Ultrasonic test records nor other records did not show that the temperature requirements specified in ASME Section XI Paragraph I-4220, had been adequately complied with.

   c. The Westinghouse (W) inspection report form No. 45336 and Westinghouse procedure No. OPS-NSD-101 required recording of the test specimens, technical specification reference identity. However, at the close of this inspection, none of 50 finalized records reviewed showed compliance to this requirement.

2. Contrary to 10 CFR Part 50, Appendix B, Criteria IX, ASME, Section XI (Summer 1975), and SNT-TC-1A, 1975, the licensee's contracted SNT-TC-1A level III representative (Flour-Pioneer, Inc.) qualification certification documents were expired. Moreover, the Flour-Pioneer, Inc. (FPI) written practice responsive to SNT-TC-1A, 1975 had not been approved by FPI managers nor the licensee.

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-305/78-10

Docket No. 50-305 License No. DPR-43

Licensee: Wisconsin Public Service Corporation
P. O. Box 1200
Green Bay, WI 54305

Facility Name: Kewaunee Nuclear Power Plant

Inspection At: Kewaunee Site, Kewaunee, Wisconsin

Inspection Conducted: April 24-26 and May 6, 1978

Inspectors: C. C. Williams _____ 7/5/78

K. D. Ward K. D. Ward 7/5/78

Approved By: D. H. Danielson, Chief 7/6/78
Engineering Support Section 2

Inspection Summary

Inspection on April 24-26 and May 6, 1978, (Report No. 50-305/78-10)
Areas Inspected: Inservice inspection QA/QC programs, implementing procedures, work activities, i.e., nondestructive examination of reactor coolant and auxiliary system components, and records review. This inspection involved a total of 44 inspector-hours onsite by two NRC inspectors.
Results: Of the three areas inspected, no apparent items of noncompliance or deviations were found in two areas; two apparent items of noncompliance were identified in one area (deficiency - failure to maintain conforming records - Paragraph 5; deficiency - failure to maintain/establish conforming records of personnel qualification records - Paragraph 6.a).

DETAILS

Persons Contacted

*A. J. Ruege, Quality Assurance Engineer
*J. S. Richmond, Plant Engineer

Westinghouse (W) and Subcontractors

B. J. Lefebvre, Engineer
E. Manning, Coordinator

Flour-Pioneer, Inc. (FPI)

*K. Becker, Contracted SNT-TC-1A, Level III

Hartford Steam Boiler Engineering and Insurance Company

F. Russe, Authorized Inspector

*Denotes those present at the exit interview.

Functional or Program Areas Inspected

1. Inservice Inspection (ISI)

   a. Wisconsin Public Service Corporation (WPS) performed inservice examinations during this outage III-IV to the requirements of the ASME Code Section XI through Summer 1975 Addenda.

   b. Westinghouse Company Nuclear Services Department (W), supplied inspection personnel, equipment and services for these examinations of system components through its subcontractors Nuclear Services Corporation (NSC), and Peabody Testing Services (PTS).

   c. A SNT-TC-1A Level III consultant was contracted from Flour-Pioneer Incorporated (FPI) to assist in the development of the Inservice inspection program and its implementation.

   d. The Philips Getschow Company provided weld surface preparation services for certain of the Class II and III components.

2. Review of ISI Programs

The inspectors determined through examination and discussion with the licensee representatives that the programatic requirements for inservice inspection of the reactor coolant system as required by the WPS Technical Specifications, Section 4.2 have been adequately established.

The inspectors reviewed, among others, the WPS Administrative Control Procedures (QCD) Section 9, the Westinghouse NSD QA Program Copy No. 078, the Westinghouse Examination Control Procedure No. OPS-NSD-100, the WPS QA Program Copy No. 18, the WPS Inservice Plan No. SP-55-085, Revision B, dated April 17, 1978, and the W program and procedures developed by W for this outage (Inservice Examination Program for Kewaunee Unit 1). The inspectors also reviewed WPS audit documents relative to this ISI activity.

No items of noncompliance or deviations were identified in the procedures reviewed.

3. Review of ISI Procedures

The procedures applicable to this activity were reviewed with respect to requirements as the ASME Code Section XI, WSP Quality Assurance Commitments, technical content, level of qualification for approval and implementation, evaluation of findings, documentation and its control. There were no adverse findings, with the exception of the related findings outlined below in Paragraph 5. The following procedures were reviewed in detail.

a. OPS-NSP-101, "Inservice Inspection Documentation", Revision 5, April 8, 1975.

b. NSD-ISI-10, "Preservice and Inservice . . . . Ultrasonic Equipment Qualification", Revision 4, June 29, 1975.

c. NSD-ISI-8, "Visual Examination Procedure", Revision 7, April 12, 1976.

d. NSD-ISI-11, "Liquid Penetrant Examination Procedure," Revision 9, May 18, 1976.

e. NSD-ISI-15, "UT Examination of Stud Bolts and Nuts", Revision 6, June 17, 1975.

f. NSD-ISI-47, "UT Examination of Circumferential and Longitudinal Butt Welds . . . .", Revision 2, April 20, 1976.

g. NSD-ISI-70, "Magnetic Particle Examination", Revision 0, November 3, 1975.

h. NSD-ISI-205, "UT Examination of Full Penetration . . . Welds," Revision 2, April 29, 1977.

i. NSD-ISI, "Supplier Qualification Documentation"

j. NSD-ISI-OP-6.3, Revision 0, "Control of Inspection"

No items of noncompliance or deviations were identified during these examinations. However, one item of concern was discussed with the licensee in that each separate procedure as identified above, does not specifically contain within its contents reference to a specific year (Edition) of the Code to which it is responding.

The licensee contended that this information is outlined in the "Cover Sheet" for the approved program and need not be documented in the "unique" procedures. While the inspectors do not share this view because each procedure is utilized separate from the cover sheet, the inspectors could not identify a specific requirement, although standard practice would include clear reference to the Edition of the Code referenced by the procedure within the procedure itself.

4. Observation of Work and Examination Activity

The inspectors observed visual, liquid penetrant, and ultrasonic inspection of various components within the reactor coolant and related auxiliary systems, i.e., chemical volume control tank etc. These observations included preparation, calibration, performance of the examination and its documentation.

No items of noncompliance or deviations were identified in the areas observed.

5. Data Review and Evaluation

Review of both the new data and the final examination reports for the ISI activity, demonstrated that the WPS QA/QC commitments had been complied with, except as follows:

These matters are considered to be in noncompliance with QA/QC commitments. (305/78-10-01)

a. The ultransonic test couplant material used during UT examinations is not identified on the ultrasonic test reports as is required by Article I-6100(b) of Section XI of the ASME Boiler and Pressure Vessel Code. The licensee stated that they possess certifications of conformance for the material used and consider this adequate. However, possession of a material certification document does not relieve the requirements that the examiner identify on the specific report what equipment (couplant) he used for the specific examination.

b. Ultrasonic test records, nor other records at the site, did not document that the temperature requirements specified in ASME Section XI, Paragraph I-4220 for calibration blocks, had been adequately complied with. The code requires that the calibration blocks be within $\pm$ 15°F. of the test specimen. The licensee representative stated that such determinations had been made twice for the many UT examinations performed. However, no documented record of such determinations was available at the close of this inspection. In addition, the NRC inspectors did not observe any such determinations being performed.

c. The Westinghouse (W) inspection report form No. 45336 and Westinghouse procedure No. OPS-NSP-101, Appendix A, require the documentation of the Technical Specification reference for each component examinated. Contrary to this each of approximately 50 such finalized records reviewed by the inspector did not comply with this requirement.

Except as noted, no items of noncompliance or deviations were identified within the data reviewed.

6. Personnel Qualification Documents

During the inspector's examination of the ISI activities, the following personnel qualification documents (performance in some cases) were reviewed in detail.

a. FPI, K. Becker (Contacted Consultant). The SNT-TC-1A Level III certifications for ultrasonic and liquid penetrant examination, for this individual expired on or about April 25, 1978 during the course of these ISI inspections. Subsequently on May 6, 1978, the licensee made his recertification documents available for the inspectors review. The recertifications conformed to the requirements of the

Flour-Pioneer, Inc. written practice as required by SNT-TC-1A, 1975, however, this written practice had not been signed or authorized by anyone within the Flour-Pioneer organization. Moreover, the licensee has not approved this document.

This matter is considered a noncompliance to 10 CFR Part 50, Appendix B, and ASME Section XI. (305/78-10-02)

NOTE: While this individual's performance has not been questioned documented certification of conformance to SNT-TC-1A had not been established at the close of this inspection.

b. W, E. F. Manning, SNT-TC-1A, Level II, UT, PT, MT, and VT.

c. W, P. E. Bukes, SNT-TC-1A, Level II, PT, UT, RT, and VT.

d. W, R. B. Webber, SNT-TC-1A, Level II, UT. MT, PT, and VT.

e. NSC, J. Goots, SNT-TC-1A, Level II MT. PT, UT, ET, and VT.

f. NSC, L. V. Donne, SNT-TC-1A, Level II, UT.

g. NSC, S. W. Levesque, SNT-TC-1A, Level I, UT.

h. NSC, P. Cox, SNT-TC-1A, Level I, UT.

i. NSC, M. H. Delaney, SNT-TC-1A, Level II, UT.

j. PTS, Steve Becker, SNT-TC-1A, Level II, MT, PT, VI: Level 1, RT, and UT.

Except as noted no items of noncompliance or deviations were identified.

7. Material and Equipment Certifications and Calibrations

During the inspections of the ISI activity outlined above, the inspectors examined and verified the adequacy of the calibration and certification documents for the following items:

a. UT Instrument S/N 712003, Certificate No. 8061

b. UT Instrument S/N 711094, Certificate No. 8062.

c. UT Instrument S/N 11615, Certificate date January 18, 1978.

d. Transducers:

(1) S/N B15851
(2) S/N C18815
(3) S/N C18816
(4) S/N C22856
(5) S/N C28828
(6) S/N C28827
(7) S/N B08808
(8) S/N B08811
(9) S/N 7585

e. Ultransonic couplant material Batch No. 11177 (Ultra gell)

f. The inspectors examined and verified the conformance of each calibration (notched) used in these UT examinations.

Exit Interview

The inspectors met with site representatives (denoted in the persons contacted Paragraph) at the conclusion of the inspection on May 6, 1978. The inspectors summarized the scope and findings of the inspection noted in this report.