

UNITED STATES  
ATOMIC ENERGY COMMISSION  
DIRECTORATE OF REGULATORY OPERATIONS  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

August 8, 1972

TELEPHONE  
(312) 858-2660

RECEIVED

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U.S. ATOMIC ENERGY COMM.  
REGULATORY  
MAIL & RECORDS SECTION

Docket No. 50-305

Wisconsin Public Service Corporation  
ATTN: Mr. E. M. James, Senior Vice President  
Power Generation and Engineering  
P. O. Box 700  
Green Bay, Wisconsin 54305

Gentlemen:

This refers to the inspection conducted by Mr. Feierabend of this office on June 27-28, 1972, of your activities at the Kewaunee Nuclear Plant authorized by AEC Construction Permit No. CPER-50 and to the discussion of our findings at the conclusion of the inspection with Mr. Giesler and others of your staff on June 28, 1972.

Areas examined during this inspection included the status of preparation of plant operating procedures and preoperational test procedures, and the provisions for supplementing the plant staff during preoperational and startup testing operations. Within these areas, the inspection consisted of selective examination of representative records and procedures, interviews with plant personnel, and observations by the inspector.

No items of noncompliance with AEC requirements were identified within the scope of this inspection.

We recognize that at the time of this inspection you had not received our communication in conjunction with the previous inspection. We understand that actions have been initiated to resolve the deficiencies identified during the last inspection, communicated to you with our letter dated August 8, 1972, and that flushing of the nuclear steam supply systems will not be resumed until those deficiencies have been resolved. This matter will be examined further during a subsequent inspection.

August 1, 1972

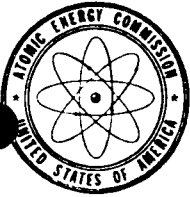
No reply to this letter is necessary; however, should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely yours,

Boyce H. Grier  
Regional Director

cc: C. W. Giesler, Superintendent, Nuclear Power  
E. R. Mathews, Manager, Power Engineering  
L. O. Remsett, Quality Assurance Supervisor

bcc: J. G. Keppler, RO  
R. H. Engelken, RO  
A. Giambusso, L  
J. B. Henderson, RO  
H. D. Thornburg, RO  
P. A. Morris, RO  
RO Files  
DR Central Files  
PDR  
Local PDR  
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UNITED STATES  
ATOMIC ENERGY COMMISSION  
DIRECTORATE OF REGULATORY OPERATIONS  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

TELEPHONE  
(312) 858-2660

July 17, 1972

J. G. Keppler, Chief, Reactor Testing and Operations Branch  
Directorate of Regulatory Operations, Headquarters

WISCONSIN PUBLIC SERVICE CORPORATION (KEWAUNEE)  
DOCKET NO. 50-305

The attached inspection report of a routine, unannounced inspection at this facility on June 27 - 29, 1972, is forwarded for information. No items of noncompliance were identified.

A review of several preoperational test procedures and operating procedures indicated that approximately 50% of the preoperational test procedures were complete. About 90% of the operating procedures, including abnormal and emergency operating procedures, were completed to the "first draft" stage.

The Nuclear Safety Review and Audit Committee (NSRAC) structure presently includes two personnel who have line responsibility. This type of organization may reduce the effectiveness of the NSRAC, unless adequate procedures and controls are established to assure independent monitoring, auditing and evaluation of test performance and test results. This committee and its performance will be closely followed during subsequent inspections.

The licensee stated that supplementary staffing will be included, as needed during the preoperational testing program.

*D. M. Hunnicutt*  
D. M. Hunnicutt, Chief  
Reactor Testing and Startup Branch

Attachment:

RO Rpt No. 050-305/72-10  
by C. D. Feierabend

cc: J. B. Henderson, RO  
R. B. Minogue, RS (3)  
R. S. Boyd, L (2)  
R. C. DeYoung, L (2)  
D. J. Skovholt, L (3)  
H. R. Denton, L (2)  
P. A. Morris, RO  
R. H. Engelken, RO  
H. D. Thornburg, RO  
RO Files  
DR Central Files

U. S. ATOMIC ENERGY COMMISSION  
DIRECTORATE OF REGULATORY OPERATIONS

REGION III

RO Inspection Report No. 050-305/72-10

Subject: Wisconsin Public Service Corporation  
Kewaunee Nuclear Power Plant  
Kewaunee, Wisconsin

License No. CPPR-50  
Priority: N/A  
Category: B

Type of Licensee: PWR - 560 Mwe (Westinghouse)

Type of Inspection: Routine, Unannounced

Dates of Inspection: June 27 - 29, 1972

Dates of Previous Inspection: June 13 - 15, 1972

Principal Inspector: *D. M. Hunnicutt*  
C. D. Feierabend

*7/14/72*  
(Date)

Accompanying Inspectors: None

Other Accompanying Personnel: None

Reviewed By: *D. M. Hunnicutt*  
D. M. Hunnicutt, Chief  
Reactor Testing and Startup Branch

*7/14/72*  
(Date)

Proprietary Information: None

## SECTION I

Enforcement Action: None

### Licensee Action on Previously Identified Enforcement Matters

The licensee had not yet received the letter that communicated enforcement action as a result of the previous inspection. Cleaning and flushing of the nuclear steam supply system (NSSS) will be resumed after the deficiencies have been resolved. (Paragraph 4)

Unresolved Items: None

### Status of Previously Reported Unresolved Items

Not included in the scope of this inspection.

Unusual Occurrences: None

### Persons Contacted

#### Wisconsin Public Service Corporation (WPS)

- \*C. Giesler, Superintendent, Nuclear Power
- \*C. Luoma, Plant Superintendent
- \*T. Meinz, Startup Group Test Coordinator
- W. White, Startup Group Test Engineer
- H. Bundy, Supervisor, Training and Procedures
- J. Richmond, Construction Test Coordinator

\*Attended Management Interview

### Management Interview

A management interview was conducted at the conclusion of the inspection on June 29, 1972.

The inspector stated that this inspection was to review the status of preoperational test procedures and operating procedures. He stated that his evaluation of the status of procedures was that approximately 50% of the preoperational test procedures were essentially complete, and the operating procedures, including abnormal and emergency operating procedures were about 90% completed to the "first draft" level. Mr. Giesler concurred.

The inspector stated that his review of several preoperational test procedures did not identify any significant deficiencies, and that the results of the reviews were discussed with the cognizant test engineers. Mr. Meintz stated that the inspector's comments would be considered for inclusion in the next revisions of the tests.

The inspector stated that, from his discussion with Messrs. Giesler and Luoma, it appeared that quality assurance (QA) functions during preoperational and startup testing may be performed by the Plant Operational Review Committee (PORC) and the Nuclear Safety Review and Audit Committee (NSRAC) if adequate procedures and controls are implemented. Mr. Giesler stated that action will be initiated to provide QA surveillance of the testing program.

The inspector stated that his discussions with Mr. Giesler concerning supplementary staffing for the testing programs indicated that directives for assigning responsibilities and authority for efficient utilization would be necessary. Mr. Giesler stated that general plans for control and utilization of the supplementary personnel are being formulated, and that directives would be issued.

The inspector stated that his discussions with Mr. Richmond indicated that suspension of cleaning and flushing of the nuclear steam supply systems continues, and that these operations will not be resumed until the deficiencies discussed during the last inspection have been resolved.

## SECTION II

### Additional Subjects Inspected, Not Identified in Section I, Where No Deficiencies or Unresolved Items Were Found

#### 1. General

There has been no significant change in the status of plant construction or testing since the last inspection.

#### 2. Preoperational Test (PT) Procedures

Review of the status of preparation of PT procedures indicated that approximately 15% have been approved and about 35% have drafts completed, being reviewed. Only about 15% have not been started, awaiting additional design information.

Three PT procedures were reviewed. The procedures reviewed were in draft stage. Licensee reviews and approvals were not yet completed. Procedures will again be reviewed when licensee reviews and approvals are complete.

##### a. PT-MS-01, Main Steam Safety Valve Tests, Draft, dated 6-16-72

This test is performed during hot functional testing when the system is stabilized at approximately 800 psig. The test utilizes a hydroset testing apparatus, specified by the valve manufacturer. The specified pressure settings agree with those prescribed in Section 10 of the FSAR.

The inspector commented that addition of a requirement to record each valve serial number during testing and a review of precautions for performing the test for assurance of maximum protection for test personnel in case of any malfunctions appeared to be appropriate.

##### b. PT-MS-02, Steam Dump Control, Draft, dated 5-5-72

The draft did not appear to provide a test to verify that the power operated relief valve will relieve automatically with the mode of control in "manual." The test engineer will review the logic to verify the desired mode of operation and will amend the test accordingly.

c. PT-CI-01, Functional Testing of Chemical Injection System

No deficiencies were identified; however, one referenced prerequisite was not readily available for review. This reference was WPS Administrative Procedure AD-03, Cleanliness and Chemistry requirements for Pre-op and Startup Testing.

3. Operating Procedures

Operating procedures, including checklist where applicable, have been prepared for normal, abnormal and emergency conditions. This inspection included review of procedure preparation, not of content of individual procedures. Of approximately 220 procedures, including checklists, between 85% and 90% are in draft form. Drafts are being reviewed in accordance with a planned review program, prior to approval by licensee management. No procedures have yet been approved.

Details of Subjects Discussed in Section I

4. Cleaning and Flushing of the Nuclear Steam Supply Systems

The inspector discussed the status of cleaning and flushing of the NSSS with Mr. Richmond, NSP Construction Test Coordinator. The procedures are being revised to eliminate the deficiencies observed during the previous inspection. The target date for completion of revisions and approvals of the procedures was July 3. Cleaning and flushing operations will not be resumed until the procedures have been reviewed and approved in accordance with the WPS Kewaunee QA Procedures Manual.

5. Quality Assurance Functions During Preoperational and Startup Testing

The inspector discussed the subject of QA with Messrs. Giesler and Luoma. The inspector stated that, in his view, the Nuclear Safety Review and Audit Committee (NSRAC) could not perform an objective audit of testing operations with the present committee structure. The current Chairman and Vice Chairman have line responsibility. The inspector stated that the committees may be able to adequately perform the QA function if the structure is revised and adequate procedures and controls are established to assure independent monitoring, auditing, and evaluation of test performance and test results.

6. Supplementary Staffing

The inspector discussed with Mr. Giesler the provisions for obtaining and utilizing personnel to supplement the licensee's operating and



engineering staffs during the test program. Mr. Giesler stated that a test engineer from the Startup Group had been assigned responsibility for all supplementary personnel to coordinate supervision and control of the personnel onsite. He stated that two PS&E engineers and four Westinghouse Instrument Company instrument and control (I&C) personnel were now onsite. He stated that current arrangements provide for the following additional personnel at the plant to support the test program.

Pioneer Services and Engineering Company: Three (total of 5) by July 15

Four (total of 9) later

(Additional design personnel  
on call)

Southern Nuclear Engineering, Inc.: Seven (as needed) All have written  
PT procedures.

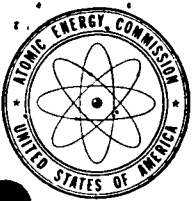
Westinghouse Electric Corporation: Seven provided in contract in advisory  
capacity (core physics, NSSS process,  
computer, etc.)

Westinghouse Instrument Company: Two (total of 6) I&C technicians

Foxboro: One I&C Engineer

Mr. Giesler stated that in addition the construction personnel, both licensee and contractor, remaining onsite will be available for assistance throughout the test program.

The inspector commented that a program document providing for supervision and control, assignment of responsibilities, etc., would be essential for efficient management in integrating the support personnel into the test program.



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TELEPHONE  
(312) 858-2660

July 17, 1972

J. G. Keppler, Chief, Reactor Testing and Operations Branch  
Directorate of Regulatory Operations, Headquarters

WISCONSIN PUBLIC SERVICE CORPORATION (KEWAUNEE)  
DOCKET NO. 50-305

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U. S. ATOMIC ENERGY COMMISSION  
DIRECTORATE OF REGULATORY OPERATIONS

REGION III

RO Inspection Report No. 050-305/72-10

Subject: Wisconsin Public Service Corporation  
Kewaunee Nuclear Power Plant  
Kewaunee, Wisconsin

License No. CPPR-50  
Priority: N/A  
Category: B

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Dates of Inspection: June 27 - 29, 1972

Dates of Previous Inspection: June 13 - 15, 1972

Principal Inspector: *D. M. Hunnicutt*  
C. D. Feierabend

*7/14/72*  
(Date)

Accompanying Inspectors: None

Other Accompanying Personnel: None

Reviewed By: *D. M. Hunnicutt*  
D. M. Hunnicutt, Chief  
Reactor Testing and Startup Branch

*7/14/72*  
(Date)

Proprietary Information: None

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Unresolved Items: None

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capacity (core physics, NSSS process,  
computer, etc.)

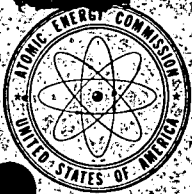
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REGION III  
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TELEPHONE  
(312) 858-2660

August 2, 1972

Wisconsin Public Service Corporation  
ATTN: Mr. E. W. James, Senior Vice President  
Power Generation and Engineering  
P. O. Box 700  
Green Bay, Wisconsin 54305

Docket No. 50-305

Gentlemen:

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No items of noncompliance with AEC requirements were identified within the scope of this inspection.

We recognize that at the time of this inspection you had not received our communication in conjunction with the previous inspection. We understand that actions have been initiated to resolve the deficiencies identified during the last inspection, communicated to you with our letter dated August 9, 1972, and that flushing of the nuclear steam supply systems will not be resumed until these deficiencies have been resolved. This matter will be examined further during a subsequent inspection.

RECEIVED

1972 AUG 11 AM 10

U.S. ATOMIC ENERGY COMMISSION  
DIVISION OF COMPLIANCE

August 9, 1972

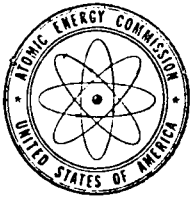
No reply to this letter is necessary; however, should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely yours,

Boyce H. Grier  
Regional Director

cc: C. W. Giesler, Superintendent, Nuclear Power  
E. R. Mathews, Manager, Power Engineering  
L. O. Ramsett, Quality Assurance Supervisor

bcc: J. G. Keppler, RO  
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September 13, 1972

Wisconsin Public Service Corporation  
ATTN: Mr. E. W. James, Senior Vice President  
Power Generation and Engineering  
P. O. Box 700  
Green Bay, Wisconsin 54305

Docket No. 50-305

Gentlemen:

Thank you for your letter dated September 5, 1972, informing us of the steps you have taken to correct the items of apparent noncompliance which we brought to your attention in our letter dated August 8, 1972. We have no further questions on these items at this time. We will examine these items further during subsequent inspections.

Your cooperation with us is appreciated.

Sincerely yours,

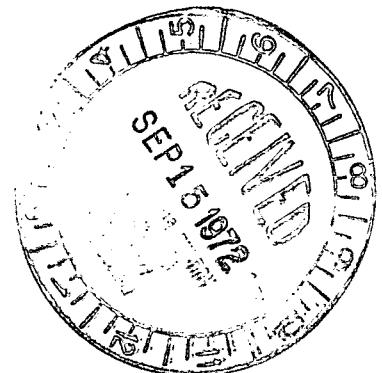
Boyce H. Grier  
Regional Director

cc: C. W. Giesler, Superintendent, Nuclear Power  
E. R. Mathews, Manager, Power Engineering  
L. O. Ramsett, Quality Assurance Supervisor

bcc w/ltr dtd 9-5-72:

J. G. Keppler, RO  
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# WISCONSIN PUBLIC SERVICE CORPORATION



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

September 5, 1972

Mr. Boyce H. Grier, Regional Director  
Directorate of Regulatory Operations - Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Grier:

Subject: Docket 50-305  
Ref: Letter 8/ 8/72  
E. W. James from B. H. Grier

This correspondence is in response to your letter of August 8, 1972, indicating non-conformances referenced by Mr. Feierabend on his visit of June 13-15, 1972. The response shall be directed by non-conformance numbers consistent with those used in your enclosure to the referenced letter.

- A.1 The duties and responsibilities of persons and organizations performing quality assurance functions during pre-operational testing have been established and delineated in writing in the Quality Assurance Program for Operations. The specific procedures for pre-operational test program is procedure QC1P 11.01 which addresses the general description of methods to be used or carrying out the quality assurance surveillance and audit functions.
- A.2 The Quality Control Procedure, QC1P-572 entitled "Procedure & for Surveillance of NSSS Cleaning and Flushing Operations"
- A.3 was written and approved dated 7/12/72. This procedure established the program implementation and surveillance procedures to be utilized for the NSSS cleaning and flushing operations along with the required documentation. More specifically, this procedure identifies for each flush path the following:
  - a) Test pre-requisites
  - b) Test flow rates
  - c) Valve alignments
  - d) Tagging requirements to identify the flush paths and placement of "Danger" and "NSSS Clean" tags being placed upon completion of the test to prevent inadvertent contamination
  - e) Documentation of flush water source and final water analysis
  - f) Documentation forms to verify compliance with the above lettered items.

SEP 11 1972

All Construction Test Procedures now incorporate the above.

- B.1 Construction tests for piping systems contain a valve positioning check-off sequence instead of a total system valve check list as the tests progress on a line-by-line basis. Test boundary tagging is done by the test engineer as guided by the WPS Safety Rules and the AD-01 tag procedures. Placement of safety tags and test tags may not be simultaneous depending on the type of testing being performed. The NSSS cleaning procedure tagging has been revised and defined in QCIP-572.
- B.2 The WPS Construction Group is so structured to utilize contractor personnel and PS&E personnel to help in the performance of their responsibilities. As such the contractors and PS&E people perform part of this surveillance effort. QCIP-572 forms now in service require sign off by these people. A chemical analysis of all final flush water is performed by people in WPS Operations employ.

Your letter of August 8, 1972, asked us to further comment on our Nuclear Safety Review and Audit Committee, our nuclear engineering group and any other changes that have been made or will be made to improve our quality assurance program for pre-operational testing.

In the area of the Nuclear Safety Review and Audit Committee, we feel the committee present structure is very adequate. In that it further fulfills the requirements of ANS 3.2, we do not contemplate changes at this time. Some avenues of inter-company participation are being explored but no immediate change is planned.

Our nuclear engineering group presently stands as described in the FSAR Section 12. In the Start-Up area we have presently five engineers and one technician functioning plus help from three PS&E people who have worked on plant design. More of these types of people will be brought in as activity in pre-op testing increases.

Very truly yours,



E. W. James, Senior Vice President  
Power Generation and Engineering

EWJ:mem