

UNITED STATES  
ATOMIC ENERGY COMMISSION  
DIVISION OF COMPLIANCE  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

TELEPHONE  
(312) 858-2660

February 16, 1972

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

Docket No. 50-305

Gentlemen:

This refers to the inspection conducted by Messrs. Jones, Vandel, Sutton, and Erb of this office on January 11-12, 1972, at the Pioneer Service and Engineering corporate offices, related to construction activities at the Kewaunee site authorized by AEC Construction Permit No. CPPR-50 and to the discussion of our findings on January 27, 1972, with Messrs. Ramsett, Dreher, Knutzen, and Geisler of your staff.

The area examined during the inspection was limited to the implementation of the Kewaunee Quality Assurance Program with specific emphasis on the area of program responsibility being implemented by Pioneer Service and Engineering personnel. Within this area, the inspection consisted of selective examination of procedures and representative records maintained by the Pioneer Service and Engineering Company at their corporate offices and interviews with both Pioneer Service and Engineering and Wisconsin Public Service personnel.

During this inspection, it was found that one of your activities appears to be in nonconformance with statements in the Kewaunee Quality Assurance Manual. The item and reference to the pertinent requirements are listed in the enclosure to this letter. Please provide us within 30 days, in writing, with your comments concerning this item, any steps which have been or will be taken to correct it, any steps that have been or will be taken to prevent recurrence, and the date all corrective action or preventive measures were or will be completed. Your reply should emphasize, in particular, any appropriate changes that have been or will be made to improve the effectiveness of your quality assurance program to prevent recurrence.

February 16, 1972

With regard to questions raised during this inspection, we understand that you intend to revise the Kewaunee Quality Assurance Manual to define more clearly the line organization responsibility of the Pioneer Service and Engineering Quality Assurance Manager, i.e., to identify a line of communication between the Quality Assurance Manager and Pioneer Service and Engineering corporate management. Our inspectors will examine your action on this matter during our next routine inspection.

Should you have questions concerning this inspection, we will be glad to discuss them with you.

Sincerely yours,

Boyce H. Grier  
Regional Director

Enclosure:  
Description of  
Nonconformance Item

cc: E. R. Mathews, Manager  
Power Engineering  
L. O. Ramsett, Quality  
Assurance Supervisor

bcc: J. B. Henderson, CO  
J. G. Keppler, CO  
L. Kornblith, CO  
R. H. Engelken, CO  
P. A. Morris, DRL  
CO Files  
DR Central Files  
PDR  
Local PDR  
NSIC  
R. L. Shannon, DTIE

ENCLOSURE

Docket No. 50-305

One of your activities appears to be in nonconformance with the Kewaunee Nuclear Power Plant Quality Assurance Procedures Manual as indicated below.

Plan No. QA 1-42 of Section 12 provides that the Pioneer Service and Engineering (PS&E) Quality Assurance Engineer and the Wisconsin Public Service Company (WPS) Quality Assurance Supervisor shall periodically meet with responsible PS&E Engineers to review approaches taken to achieve quality and to evaluate the quality assurance program, and that the highlights of these meetings shall be reported to both WPS and PS&E management.

Contrary to the above, documentary evidence was not available during the inspection to establish that periodic quality assurance meetings were held nor to establish that the results of such meetings were reported to WPS and PS&E management.



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(312) 858-2660

February 11, 1972

J. B. Henderson, Chief, Reactor Construction Branch  
Division of Compliance, Headquarters

WISCONSIN PUBLIC SERVICE CORPORATION (KEWAUNEE)  
DOCKET NO. 50-305  
A-E QUALITY ASSURANCE PROGRAM AUDIT (PIONEER SERVICES AND ENGINEERS)

The attached report of a special quality assurance program inspection at the subject facility Architect-Engineers' corporate offices on January 10 - 12, 1972, and a subsequent management interview at the licensee's corporate offices on January 27, 1972, is transmitted for information.

The results of the inspection indicates that: (1) the Kewaunee QA Manual (one manual serves both the licensee and the A-E) did not adequately establish independence of the Pioneer Service and Engineers' QA organization, and (2) internal, periodic audits of the Kewaunee Quality Assurance Program were not being accomplished as required by the Quality Assurance Manual. The latter matter is to be called to the attention of corporate management in the letter (Enclosure) to the licensee summarizing the results of the inspection.

W. E. Vetter  
Senior Reactor Inspector

Attachment:  
CO Rpt No. 050-305/72-02 by C. E. Jones

cc: J. G. Keppler, CO  
E. G. Case, DRS (3)  
R. S. Boyd, DRL (2)  
R. C. DeYoung, DRL (2)  
D. J. Skovholt, DRL (3)  
H. R. Denton, DRL (2)  
L. Kornblith, CO  
R. H. Engelken, CO  
CO Files  
DR Central Files

U. S. ATOMIC ENERGY COMMISSION  
DIVISION OF COMPLIANCE

REGION III

CO Inspection Report No. 050-305/72-02

Subject: Wisconsin Public Service Corporation  
Green Bay, Wisconsin  
Kewaunee Nuclear Power Station  
Kewaunee, Wisconsin

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

Type of Licensee: PWR (W) - 560 Mwe

Type of Inspection: Special, Announced Quality Assurance Inspection  
(Pioneer Service and Engineering Company)

Dates of Inspection: January 11 - 12, 1972  
January 27, 1972 (Management Interview)

Dates of Previous Inspection: January 10 - 12, 1972 (Test and Startup Unit)

Principal Inspectors: C. E. Jones

*J. W. Sutton for*  
2-11-72  
(Date)

*J. W. Sutton*  
J. W. Sutton

2-11-72  
(Date)

Accompanying Inspectors: T. E. Vandel

*T. E. Vandel*  
2-11-72  
(Date)

*C. M. Erb*  
C. M. Erb

2/11/72  
(Date)

Other Accompanying Personnel: None

Reviewed By: *J. W. Sutton for*  
W. E. Vetter, Senior Reactor Inspector

2-11-72  
(Date)

Proprietary Information: None

## SECTION I

### Enforcement Action

Verbal and documented information available during the inspection indicated that the Quality Assurance Program requirements for review and audit of the effectiveness of the program had not been implemented. (Paragraph 4)

Licensee Action on Previously Identified Enforcement Matters: Not applicable

### Unresolved Items

During the inspection, it was found that the PS&E Quality Assurance Program Manual was inconsistent with the requirements of 10 CFR 50, Appendix B, Section I (Organization). (Paragraph 3)

Status of Previously Reported Unresolved Items: Not applicable

Unusual Occurrences: Not applicable

### Persons Contacted

#### Wisconsin Public Service Corporation (WPS)

L. O. Ramsett, Quality Assurance Supervisor

#### Pioneer Service and Engineering Company (PS&E)

D. M. Leppke, Vice President, Engineering  
I. (NMI) Nelson, Project Manager, Kewaunee  
H. (NMI) Hollingshaus, Manager, Nuclear Engineering  
J. J. Poer, Manager, Quality Assurance  
J. K. Leipper, Quality Assurance Engineer  
R. E. Hawes, Quality Assurance Engineer

### Management Interview

A management interview was held at the WPS corporate offices, Green Bay, Wisconsin, on January 27, 1972, with the following people in attendance:

#### Wisconsin Public Service Corporation (WPS)

L. O. Ramsett, Quality Assurance Supervisor  
M. F. Dreher, Quality Control Supervisor (Site)  
N. E. Knutzen, Construction Supervisor  
C. W. Geisler, Superintendent, Nuclear Power

Pioneer Service and Engineering Company (PS&E)

I. (NMI) Nelson, Project Manager  
J. J. Poer, Manager, Quality Assurance

Discussion during the management interview included:

- A. The inspector expressed concern for the apparent lack of authority and organizational freedom of the PS&E Quality Assurance Manager. Mr. Nelson responded that the organization chart (No. 1.0) has been revised, following the inspection, to identify a direct channel of communication between the PS&E Quality Assurance Manager and the PS&E President.
- B. The second area of concern discussed was the lack of documented audits to establish PS&E implementation of the PS&E QA program internal audit requirements identified in the PS&E QA manual.

Mr. Nelson commented that a new procedure had been prepared since the inspection on January 11 - 12, 1972, which provides for documentation and reporting to management of all audits performed. This, he explained, is opposed to past practice wherein informal audits were conducted but were not documented.

## SECTION II

### Additional Subjects Inspected, Not Identified in Section I, Which Were Found to be Free of Deficiencies or Unresolved Problem Areas

#### 1. General

With the start of the Kewaunee project, PS&E represented WPS in the areas of architect - engineering, construction management, and quality assurance/quality control. A Kewaunee Nuclear Power Plant Quality Assurance Manual was prepared by PS&E for which a Compliance review was performed and reported in CO Report No. 305/69-5. Within the last year, however, the site QA/QC responsibilities were re-assigned and are now retained by WPS.

This report is an evaluation of (1) the PS&E implementation of the requirements of the Kewaunee QA Manual and, (2) compliance with Appendix B of 10 CFR Part 50 in those areas presently the responsibility of PS&E.

2. Sections II through XVIII of the PS&E Quality Assurance manual were found to be consistent with the requirements of 10 CFR Part 50, Appendix B.

### Details of Subjects Discussed in Section I

#### 3. Section I - Organization

PS&E provided the inspector with a copy of an organization chart, No. 1.0, dated November 3, 1971, as evidence of compliance to 10 CFR Part 50, Appendix B, Section I. This chart provides, in addition to the in-line staff organization reporting to the President, Mr. C. R. Barthelemy, the Kewaunee project staff reporting to the Project Manager, Mr. I. Nelson.

It was found that the Manager of Quality Assurance reports directly to the Kewaunee Project Manager, apparently without provision for sufficient authority and organizational freedom, to initiate solutions or to verify implementation of solutions of quality problems.

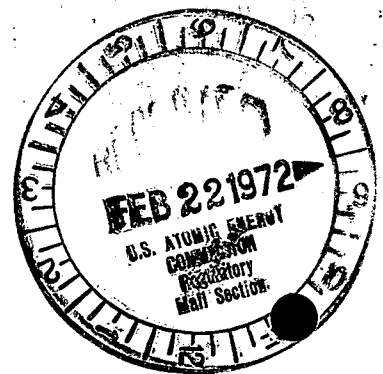
This area of concern was discussed with the licensee during the management interview meeting and the PS&E representative identified changes in the organization chart which appear to provide the needed consistency with 10 CFR Part 50, Appendix B, Criterion I.

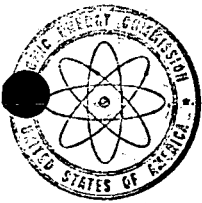


4. Section XVIII - Audits

Documentation of planned and periodic audits performed for in-house QA activities was requested for review. The review of available documents indicated that only a single QA audit for each design branch (i.e., mechanical, electrical, and structural) was accomplished and that these audits occurred approximately 18 months ago. This lack of planned and periodic QA program audits was discussed with the licensee during the management interview meeting in terms of the fact that the Kewaunee Quality Assurance Manual requires that the WPS and PS&E Quality Assurance personnel shall periodically and jointly hold conferences to evaluate the efficiency of the Quality Assurance Program and shall report the results of conferences to both WPS and PS&E corporate management.

The apparent failure to accomplish this activity is to be called to the attention of corporate management in the letter (Enclosure) to the licensee summarizing the results of the inspection.





UNITED STATES  
ATOMIC ENERGY COMMISSION  
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REGION I  
970 BROAD STREET  
NEWARK, NEW JERSEY 07102

201 645-3942

FEB 23 1972

Maine Yankee Atomic Power Company  
Attention: Mr. D. E. Vandenberg  
Vice President  
20 Turnpike Road  
Westboro, Massachusetts 01581

Docket No. 50-309

Gentlemen:

This letter refers to the inspection conducted by Mr. Fasano of this office on January 18-21, 1972, of activities authorized by AEC Construction Permit No. CPPR-55, and to the discussions of our findings held by Mr. Fasano with Mr. J. B. Randazza of your staff at the conclusion of the inspection.

Areas examined during the inspection included preoperational test procedures, flush procedures, startup and test procedures and the security plan. Within these areas, the inspection consisted of selective examinations of procedures and representative records, discussions with plant personnel and observations by our inspector.

Within the scope of this inspection, no items of noncompliance were observed.

As a result of the inspection, we wish to confirm our understanding of items which were discussed at the conclusion of the inspection. These items, with clarifying comments, as appropriate, are as follows:

1. The preoperational test procedures will be modified to assure verification of pump capacities that relate to safety. The preoperational test procedure will include verification that the opening and closing time of safety valves meet design requirements.
2. The implementing procedures for the overall security program will be prepared, approved and issued in the near future.

The items identified in our letter to you, dated November 24, 1971, have been reviewed by our inspector. We have no further questions on these items.

The items identified in our letter, dated October 27, 1971, continue to receive our attention. The inspector has verified that Item 3 of the referenced letter, the area monitor, has been relocated in the sample room. We have no further questions concerning this item. We note that your Amendment No. 32 of November 30, 1971 provided DRL with detailed information on the items remaining. These items remain outstanding pending DRL review and inspection by this office.

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

Very truly yours,

James P. O'Reilly  
Director

bcc: L. Kornblith, CO  
R. H. Engelken, CO  
P. A. Morris, DRL  
J. G. Keppler, CO  
J. B. Henderson, CO  
CO Files  
DR Central Files ✓  
PDR  
Local PDR  
NSIC  
DTIE, (T. Laughlin)

cc: Mr. J. B. Randazza  
Maine Yankee Atomic Power Co.  
Wiscasset, Maine

WISCONSIN PUBLIC SERVICE CORPORATION -  
CO REPORT NO. 050-305/72-01

A review of the subject report and the related letter to the licensee prompts the following comments:

The subject report indicates that a deficiency may exist in the licensee's review of pre-operational test procedures. In our view, this should have been listed as an unresolved item. In addition, the letter to the licensee was not used to confirm the licensee commitment in this area, as suggested in Manual Chapter 1000, Attachment to Section 1045.

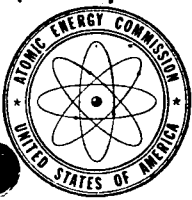
D. M. Hunnicutt X  
Region III

cc: B. H. Grier, CO:III

bcc: M. Hildreth, CO

50-305  
map

OFFICE ▶	CO	7 CO	7 CO		
SURNAME ▶	MSHildreth:nw	FJNolan	JGKepler	J. G. Kepler, CO	2/15/72
DATE ▶	2/15/72				



UNITED STATES  
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799 ROOSEVELT ROAD  
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TELEPHONE  
(312) 858-2660

January 27, 1972


J. G. Keppler, Chief, Reactor Testing and Operations Branch  
Division of Compliance, Headquarters

WISCONSIN PUBLIC SERVICE CORPORATION (KEWAUNEE)  
DOCKET NO. 050-305

The attached report is forwarded for information.

The inspection was primarily to observe initial preoperational testing in progress. Testing observed by the inspector appeared to be technically correct; however, there were deficiencies in documentation that included lack of adequate signoff for some prerequisites and initial conditions and some entries contained only check marks or initials with no references to identify the person performing the test. A list of test equipment used had not been included. The test had not been completed and information to correct the identified record deficiencies appears to be retrievable.

It appears that the licensee may have had a discontinuity in communications within the organization. The inspector reviewed the scope of the QA requirements with the licensee. This item will be further pursued during subsequent inspections.

  
D. M. Hunnicutt  
Senior Reactor Inspector

Attachment:

CO Rpt No. 050-305/72-01 by  
C. D. Feierabend

cc: J. B. Henderson, CO  
E. G. Case, DRS (3)  
R. S. Boyd, DRL (2)  
R. C. DeYoung, DRL (2)  
D. J. Skovholt, DRL (3)  
H. R. Denton, DRL (2)  
A. Giambusso, CO  
L. Kornblith, CO  
R. H. Engelken, CO  
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U. S. ATOMIC ENERGY COMMISSION  
DIVISION OF COMPLIANCE

REGION III

CO Inspection Report No. 050-305/72-01

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

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

Type of Licensee: PWR - 550 Mwe (Westinghouse)

Type of Inspection: Routine, Unannounced

Dates of Inspection: January 10-12, 1972

Dates of Previous Inspection: December 6-8, 1971

Principal Inspector:

*C. D. Feierabend*  
C. D. Feierabend

1/26/72  
(Date)

Accompanying Inspectors: None

Other Accompanying Personnel: None

Reviewed By: *J. H. Snieszko for*  
D. M. Hunnicutt, Senior Reactor Inspector

1/26/72  
(Date)

Proprietary Information: None

SECTION I

Enforcement Action: None

Licensee Action on Previously Identified Enforcement Matters: None

Unresolved Items: None

Status of Previously Reported Unresolved Items: None

Unusual Occurrences: None

Persons Contacted

Wisconsin Public Service Corporation (WPS)

C. Giesler, Superintendent, Nuclear Power  
C. Luoma, Plant Superintendent  
H. Bundy, Operating Procedures Coordinator  
T. Meinz, Startup Group Test Coordinator  
W. White, Startup Group Test Engineer  
M. Dreher, Quality Control Supervisor  
D. Mc Swain, Instrument Supervisor  
L. Ryan, Startup Group Test Technician

Pioneer Services and Engineering Company (PS&E)

J. Nagl, Field Engineer, Electrical

Multi-Amp Engineering Services Corporation

L. Hyde, Electrical Test Engineer

Management Interview

A meeting with WPS management was held at the conclusion of the inspection.  
Licensee personnel present were:

C. Giesler, Superintendent, Nuclear Power  
T. Meinz, Startup Group Test Coordinator



The inspector stated that the purpose of the inspection was to observe the status of preoperational testing. The inspector stated that he had observed some electrical testing in progress and that the technical adequacy of this testing appeared to be sufficient, but that some deficiencies in test procedure documentation were observed. Mr. Mainz stated that the tests were not yet complete and that the documentation would be upgraded to assure that the test records meet the criteria for Quality Assurance records. The inspector discussed the apparent deficiencies, and stated that test records of completed tests would be inspected during subsequent inspections to verify that the tests satisfy all requirements.

The inspector stated that discussions with test engineers and quality assurance personnel indicated that there may be a deficiency in communication concerning the scope of reviews of preoperational test procedures. Mr. Giesler stated that the Startup Test Program, which assigns responsibilities for the scope of review, is being revised. He stated that the revision should clarify the scope of review assignments and that he would follow up to assure that a communications problem does not exist.

The inspector stressed the requirement that the test records meet the criteria for Quality Assurance records specified in 10 CFR 50, Appendix B, Section XVII.

In response to a question concerning the status of the makeup water system, Mr. Giesler stated that a decision had been made to change the design of the makeup water system by using a prefilter system upstream of the present makeup system. Temporary cartridge type filters will be installed until a permanent system can be designed and placed in service.

## SECTION II

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

1. System for preparing, reviewing, and approving operating procedures.
2. Plant Instrumentation and Control Test Procedure Manual.

### Details of Subjects Discussed in Section I

#### 3. Observation of Testing

The inspector observed a portion of test PT-EHV-03, Phasing Verification Test of the 4160V Supply and Distribution System. The portion observed included phasing verification of protective relaying for the tertiary auxiliary transformer. Test equipment was examined for calibration data. Each piece of test equipment had a current calibration sticker covering access to calibration adjustments. Calibration records were available onsite.

Review of the test procedure in use identified some apparent deficiencies in recording the data. This included a lack of adequate signoff for some prerequisites and initial conditions. Some entries were only check marks or initials, with no reference to identify initials to the person performing the test. The references used for the test were not identified by date or revision. A list of test equipment used had not been included. The test was not yet complete. Some of the information was included in a test log maintained by the Test Engineer.

The inspector discussed the deficiencies with the Test Engineer, the Startup Test Coordinator, and the Superintendent of Nuclear Power. Information to eliminate the record deficiencies appears to be retrievable. The licensee will review the completed test records for assurance that they meet 10 CFR 50 criteria during evaluation of the test.

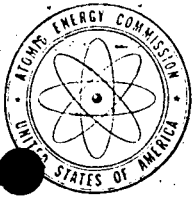
#### 4. Review of Test Procedures

The inspector reviewed test procedures for two additional electrical tests that had been partially completed. The same deficiencies identified in paragraph 3, above, also existed in the partial tests of the DC system and the 4160V switchgear tests; however, a detailed

summary of the switchgear timing tests prepared by a Multi-Amp technician provided a good record of the testing performed, including identification of the test equipment, identification of deficiencies found and corrected during the test, and identification of minor maintenance deficiencies remaining after the test was complete.

5. Licensee Review of Test Procedures

Discussion of licensee reviews of test procedures with Startup Group personnel and with members of the Quality Assurance staff indicated that there were differences of opinion concerning the scope of the review assignments. This subject was discussed with Mr. Giesler. Mr. Giesler stated that the Startup Program Manual is being revised and that the revision will clarify the scope of review assignments.



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TELEPHONE  
(312) 858-2660

January 26, 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:

This refers to the inspection conducted by Mr. Feierabend of this office on January 10-12, 1972, of your activities at the Kewaunee Nuclear Power Plant authorized by AEC Construction Permit No. CPPR-50 and to the discussion of our findings at the conclusion of the inspection with Mr. Giesler and other representatives of your staff at the company's corporate office on January 12, 1972.

Areas examined during this inspection included preoperational testing in progress, and review of the provisions for preparing operating procedures. 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.

During the inspection, some apparent deficiencies in documentation of preoperational test results were observed which involved incomplete record of test results. We understand that action is being taken to assure that the documentation of test results will be complete. This matter will be examined further during a subsequent inspection.

January 26, 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. Ramsatt, Quality Assurance Supervisor

bcc: J. G. Keppler, CO  
L. Kornblith, CO  
R. H. Engelken, CO  
P. A. Morris, DRL  
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