

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

TELEPHONE  
(312) 858-2660

A. RO Inspection Report No. 050-305/74-05

Transmittal Date : March 27, 1974

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DR Central Files  
Regulatory Standards (3)  
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B. RO Inquiry Report No. \_\_\_\_\_

Transmittal Date : \_\_\_\_\_

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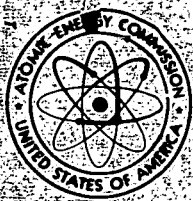
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C. Incident Notification From: \_\_\_\_\_  
(Licensee & Docket No. (or License No.))

Transmittal Date : \_\_\_\_\_

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TELEPHONE  
(312) 858-2660

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

Docket No. 50-305

Gentlemen:

This refers to the inspection conducted by Mr. C. D. Feierabend of this office on February 4-6, 1974, of Test and Startup activities at Kewaunee Nuclear Power Plant authorized by AEC Operating License No. DPR-43 and to the discussion of our findings with Messrs. Giesler and Luoma at the conclusion of the inspection.

A copy of our report of this inspection is enclosed and identifies the areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, interviews with plant personnel, and observations by the inspector.

No violations of AEC requirements were identified within the scope of this inspection.

In accordance with Section 2.790 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the AEC's Public Document Room. If this report contains any information that you or your contractors believe to be proprietary, it is necessary that you make a written application to this office, within twenty days of your receipt of this letter, to withhold such information from public disclosure. Any such application must include a full statement of the reasons for which it is claimed that the information is proprietary, and should be prepared so the proprietary information identified in the application is contained in a separate part of the document. Unless we receive an application to withhold information or are

Wisconsin Public Service  
Corporation

- 2 -

MAR 27 1974

otherwise contacted within the specified time period, the written material identified in this paragraph will be placed in the Public Document Room.

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

Sincerely yours,

James G. Keppler  
Regional Director

Enclosure:

RO Inspection Rpt No. 050-305/74-05

bcc: RO Chief, FS&EB  
RO:HQ (4)  
Licensing (4)  
DR Central Files  
RO Files  
PDR  
Local PDR  
NSIC  
DTIE  
OGC, Beth, P-506A  
R. Renfrow, GC (2)

U. S. ATOMIC ENERGY COMMISSION  
DIRECTORATE OF REGULATORY OPERATIONS

REGION III

Report of Test and Startup

RO Inspection Report No. 050-305/74-05

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

Kewaunee Nuclear Power Plant  
Kewaunee, Wisconsin

License No. DPR-43  
Category: B

Type of Licensee: PWR 560 Mwe (W)

Type of Inspection: Special, Announced

Dates of Inspection: February 4-6, 1974

Dates of Previous Inspection: January 22-25, 1974 (Emergency Planning)

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

*3/21/74*  
(Date)

Accompanying Personnel: None

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

*3/21/74*  
(Date)

## SUMMARY OF FINDINGS

Enforcement Action: None

### Licensee Action on Previously Identified Enforcement Matters

The following enforcement actions were identified in RO Inspection Report No. 050-305/73-30.

#### A. Evaluation of Test Results

Action was not yet complete.

#### B. Operation of Plant Systems in Accordance with Procedures

Implementation of procedures utilizing system check list was completed. This item is considered resolved.

#### C. Equipment Status Identification

Responsibility for enforcement of tagging procedures has been assigned. This item is considered resolved.

#### D. Procedures for Abnormal Valve Lineup

Action was not complete on this item.

### Unusual Occurrences

- A. Failure of a SOLA transformer caused a temporary loss of power to one instrument bus. (Paragraph 3)
- B. Analysis of reactor coolant identified chlorides in excess of technical specification limits. (Paragraph 4)

### Other Significant Findings

#### A. Current Findings

The reactor coolant system was at normal operating temperature and pressure. Testing to be performed prior to initial criticality was in progress.

The licensee has initiated a reaudit and re-evaluation of all safety related preoperational and startup test records.

B. Unresolved Items

1. Licensee evaluation of the failure of the instrument bus power supply.
2. Completion of licensee evaluation of safety related test records.
3. Resolution of high chlorides in reactor coolant system.

C. Status of Previously Reported Unresolved Items

1. Failure of Instrument Air Header (RO Inspection Report No. 050-305/73-02)

Licensee evaluation is complete. Recent revisions to the supply purge air from downstream of the filters completed the licensee's corrective action. This item is considered resolved.

2. Main Steam Isolation Valve (MSIV) Testing (RO Inspection Report No. 050-305/73-19)

MSIV testing cannot be performed until turbine modification is complete. This item remains unresolved.

3. Vibration of Charging Pump Discharge Lines (RO Inspection Report No. 050-305/73-19)

The licensee has initiated an investigation of the line vibration. Data acquisition was in progress. This item remains unresolved.

4. RTD Bypass Loop Calibration (RO Inspection Report No. 050-305/73-19)

Testing at normal operating pressure and temperature was not complete; however, the test is scheduled for performance during startup testing. This item is considered resolved.

5. Pressurizer Safety Valve Testing (RO Inspection Report No. 050-305/73-19)

Pressurizer safety valve testing has been completed. This item is considered resolved.

6. Documentation of Resolution of Preoperational Test Deficiencies (RO Inspection Report No. 050-305/73-26)

The licensee has initiated a full audit of safety related test records. This item remains unresolved pending the results of the audit.

7. Updating of Plant Document to Include Results of Preoperational Testing (RO Inspection Report No. 050-305/73-24)

Action was not complete. This item remains unresolved. The licensee audit of test records is expected to resolve this item also.

8. Evaluation of Cause of Failures (RO Inspection Report No. 050-305/73-26)

This item remains unresolved.

9. Responsibility for Planning Major Maintenance Activities (RO Inspection Report No. 050-305/73-26)

This item remains unresolved.

10. Control of Maintenance Activities (RO Inspection Report No. 050-305/73-26)

The licensee has upgraded implementation of the maintenance request system to provide better control. This item is considered resolved.

11. Maintenance Staff (RO Inspection Report No. 050-305/73-26)

The licensee has added one more maintenance man to the staff, completing all authorized vacancies except for two welders. The licensee is reassessing all personnel requirements, and will make recommendations to cooperate management concerning plant staffing. This item remains unresolved.

12. Functional Description of Departmental Responsibilities (RO Inspection Report No. 050-305/73-26)

This item remains unresolved.

13. Plant Performance Engineer (RO Inspection Report No. 050-305/73-26)

The plant performance engineer has been relieved of assignment to plant operations, and was performing his assigned function. This item is considered resolved.

14. Startup Test Review and Approval (RO Inspection Report No. 050-305/73-30)

Action on this item was not complete. This item remains unresolved.

15. Status of Design Changes (RO Inspection Report No. 050-305/73-30)

Action was not complete. This item remains unresolved.

16. Verification of Adequacy of Shield Building Ventilation  
(RO Inspection Report No. 050-305/73-30)

Amendment No. 34 to the FSAR has been submitted to Licensing.  
This item is considered resolved.

17. Resolution of Deficiencies and Test Results (RO Inspection  
Report No. 050-305/73-31)

Resolution of this item will be included in Item No. 6 above.

18. Licensee Evaluation of the Malfunction of the Spent Fuel  
Handling Tool (RO Inspection Report No. 050-305/74-01)

Action was not complete. This item remains unresolved.

19. Licensee Evaluation of Diesel Generator Air Start Malfunctions  
(RO Inspection Report No. 050-305/74-02)

Action was not complete. This item remains unresolved.

Management Interview

The inspector conducted a management interview with Messrs. Giesler and Luoma at the conclusion of the inspection. The inspector stated that this was a special inspection to observe the progress of startup testing and to resolve items outstanding from previous inspections. The inspector stated that his observation and reviews of test records with respect to the violations previously identified in conjunction with test records did not verify that the licensee's corrective actions had been effective in resolving all of the deficiencies. In response to the licensee's questions concerning adequacy of test evaluation, the inspector stated that, as a minimum, the evaluation should address each test or measurement where the test record indicates that specified criteria were not met, and any portions of the records that do not meet the criteria for QA records as specified in Section XVII, 10 CFR 50, Appendix B. The inspector also stated that the evaluation should determine whether or not retest is recommended.

The licensee stated that, as a result of the inspector's discussions, a decision had been made to perform a reaudit of all of the safety



related preoperational test records, and that the results would be re-evaluated by licensee and contractor design engineers for full assurance that the test records adequately verify the testing performed.

The inspector discussed the status of previously reported unresolved items, identified above. The licensee furnished current information concerning the status as shown.

## REPORT DETAILS

### 1. Persons Contacted

#### Wisconsin Public Service Corporation (WPS)

C. Giesler, Superintendent, Nuclear Power  
C. Luoma, Plant Superintendent  
R. Lange, Assistant Plant Superintendent  
C. Steinhardt, Reactor Supervisor  
M. Stern, Reactor Test Engineer  
W. Truttman, operations Supervisor  
J. Bly, Shift Supervisor  
D. Ristau, Shift Supervisor  
R. Zube, Control Operator  
W. Wagner, Control Operator

#### Nuclear Services Corporation (NSC)

J. Beresford, Field Engineer  
J. Zywczyak, Field Engineer  
W. Rowley, Manual and Procedures Coordinator

### 2. Startup Testing

The inspector observed startup testing activities in progress. This included control rod drive stepping testing (hot) and pressurizer pressure control. Pressurizer pressure control testing was suspended due to failure of two pressurizer heater control circuits. The licensee was attempting to resolve the problem prior to resuming the test.

### 3. Loss of Power to Instrument Bus

On January 27, 1974, the operating staff observed that one instrument bus supply had automatically transferred to the battery. Investigation found that the circuit breaker cabinet was smoking from an apparent short circuit, although the feeder breaker was open. The instrument bus was manually transferred to the alternate power supply. This action stopped the smoking in the circuit breaker cabinet.

Further investigation identified the problem as a short circuit in the SOLA transformer. The short circuit continued to exist after transfer to the battery.

The licensee had determined that the occurrence was not reportable, due to plant conditions. The licensee's investigation and evaluation are continuing.

4. Reactor Coolant Chemistry

On February 6, 1974, just prior to completion of the inspection, the radiochemistry supervisor informed the operating staff that a reactor coolant sample indicated that the chloride concentration was greater than the technical specification limit for steady state operation. He stated that action was being taken to reduce the chloride concentration.

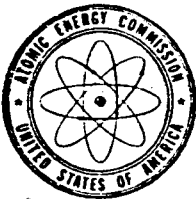
5. Preoperational Testing

Preoperational testing to be performed prior to criticality was in progress.

PT-RCP-05 - Time Response Testing. Two reactor trip signals did not meet acceptance criteria for time response; the reactor coolant pump under frequency reactor trip and the turbine trip reactor trip. These items were identified for resolution in accordance with the licensee's test program. The turbine trip signal time response could not be measured because of the status of the turbine. This was identified for resolution prior to operation of the turbine.

6. Test Records

The inspector reviewed a sample of preoperational test records to determine whether deficiencies in recording and evaluating data identified during previous inspections had been resolved. The same deficiencies existed, such as lack of dates and signatures on test data. This was discussed with the test engineers and during the management interview.



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GLEN ELLYN, ILLINOIS 60137

TELEPHONE  
(312) 858-2660

A. RO Inspection Report No. 050-305/74-04

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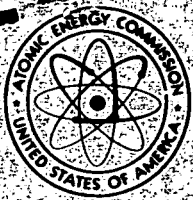
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LB



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

TELEPHONE  
(312) 856-2660

MAR 4 1974

Docket No. 50-305

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

Gentlemen:

This refers to the inspection conducted by Mr. Lonergan of this office on January 22 and 25, 1974, of activities at the Kewaunee Nuclear Power Plant authorized by AEC Operating License No. DPR-43 and to the discussion of our findings with Mr. C. R. Luoma and others of your staff at the conclusion of the inspection.

A copy of our report of this inspection is enclosed and identifies the areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, interviews with plant personnel, and observations by the inspector.

No violations of AEC requirements were identified within the scope of this inspection. However, one item associated with the KNPP Emergency Plan was identified as needing further action. A description of this item is contained in Paragraph 7 of the Report Details Section of the enclosed inspection report. It is our understanding that the appropriate action will be taken. We will examine these actions during a subsequent inspection.

In accordance with Section 2.790 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the AEC's Public Document Room. If this report contains any information that you or your contractors believe to be proprietary, it is necessary that you make a written application to this office, within twenty days of your receipt of this letter, to withhold such information from public disclosure. Any such application must include a full statement of the reasons for which it is claimed that the information is proprietary, and should be prepared so the proprietary information identified in the application is contained in a separate part of the document. Unless we receive an application to withhold information or are otherwise contacted within the specified time period, the written material identified in this paragraph will be placed in the Public Document Room.

Wisconsin Public Service  
Corporation

- 2 -

MAR 4 1974

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.

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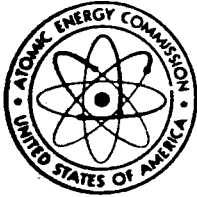
James G. Keppler  
Regional Director

Enclosure:

RO Inspection Rpt No. 050-305/74-04

cc: C. W. Giesler, Superintendent  
Nuclear Power, w/o encl

bcc: RO Chief, FS&EB  
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MAR 4 1974

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

Docket No. 50-305

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Wisconsin Public Service  
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MAR 4 1974

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,

James G. Keppler  
Regional Director

**Enclosure:**

RO Inspection Rpt No. 050-305/74-04

cc: C. W. Giesler, Superintendent  
Nuclear Power, w/o encl

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

**MAR 10 1975**

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

Docket No. 50-305

Gentlemen:

This acknowledges receipt of your letters dated February 21, and March 4, 1975.

The steps, detailed in your February 21 letter, which you have taken to correct the items of noncompliance brought to your attention in our letter of December 5, 1974, will be examined during a subsequent inspection.

The comments provided in your March 4 letter regarding your commitment to Regulatory Guide 5.20 will be discussed further with you during a planned management meeting on April 9, 1975.

Sincerely yours,

James G. Keppler  
Regional Director

bcc w/ltrs dtd 2/21/75 and 3/4/75:

IE Chief, FS&EB

IE:HQ (4)

Licensing (4)

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IE Files

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OGC, Beth, P-506A w/o encl



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WISCONSIN PUBLIC SERVICE CORPORATION



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

February 21, 1975

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

Attention: Mr. Gaston Fiorelli, Chief  
Operations Branch

Dear Mr. Fiorelli:

Reference: Docket 50-305  
Operating License DPR-43  
RIOR 050/305/74-4  
WPS Letter to USNRC dated January 30, 1975

The enclosure is the additional clarification of our security activities which we stated in the referenced letter would be resolved by March 1, 1975.

The subject matter is exempt from disclosure according to Section 2.790 of the AEC's "Rules and Practices" Part 2, Title 10, Code of Federal Regulations; and, therefore, it is requested that this evidence not be placed in the Public Document Room.

Very truly yours,

A handwritten signature in cursive script, appearing to read "E. W. James".

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

EWJ:sna

Enc.

cc - Mr. Dwane Boyd  
Dr. D. F. Knuth

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EXEMPT FROM DISCLOSURE

ENCLOSURE

Wisconsin Public Service Corporation

Docket No. 50-305

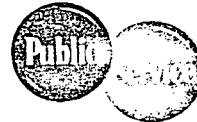
The following is the additional clarification of our security activities which was committed to by our letter of January 30, 1975, in regard to RIOR 050/305/74-4.

1. As of February 21, 1975, our guards shall be armed with a weapon of at least caliber .38, loaded with at least 5 rounds prior to use.
2. A revised Security Manual has been prepared to correct the errors noted in the compliance inspection and revise the manual to agree with the recent organizational change as specified in Amendment 7 to the Technical Specifications. This revised manual will be transmitted by March 1, 1975, to NRC for approval.

EWJ:sna

2/21/75

WISCONSIN PUBLIC SERVICE CORPORATION



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

March 4, 1975

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

Dear Mr. Keppler:

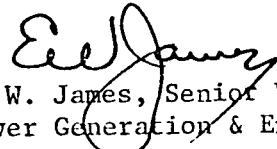
Reference: Docket 50-305  
Operating License DPR-43  
RIOR 050/305/74-4  
Mr. Keppler's letter to Mr. James  
of February 21, 1975

The enclosure is a restatement of specific commitment to Regulatory Guide 5.20 as presented in the Kewaunee Plant Industrial Security Manual. All of the enforcement action items noted in the referenced inspection report of December 5, 1974, have been resolved and appropriate action taken without a variation in our specific commitment to Regulatory Guide 5.20 as presented in the Security Manual. It is, therefore, expected that this matter will be closed.

It should be clear that our continued objection in regards to the persistent attempted enforcement of Regulatory Guides requirements which we have not agreed to comply with, is a matter of principle and in many instances necessary to maintain practical operability of the Kewaunee Nuclear Power Plant.

Specific items in the attached enclosure are exempt from disclosure according to Section 2.790 of the NRC's "Rules and Practices," Part 2, Title 10, Code of Federal Regulations; and therefore, it is requested that the enclosure not be placed in the Public Document Room.

Very truly yours,

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

EWJ:sna

Enc.

cc - Dr. D. F. Knuth  
Mr. Dwane Boyd

MAR 6 1975

EXEMPT FROM DISCLOSURE

ENCLOSURE

Wisconsin Public Service Corporation  
Docket No. 50-305

The following is an additional clarification of our specific commitment to Regulatory Guide 5.20 and the matter of arming guards:

It is our understanding that when a particular Regulatory Guide is referenced, in part or in its entirety within the Technical Specifications, Security Program Manual, or any other formal commitment; we as licensees are required to adhere to that specific commitment.

We wish to point out again that our Security Manual states:

"The selection and training of the guard force will conform to the requirements of Regulatory Guide 5.20, 'Training, Equipping, and Qualifying of Guards and Watchmen'".

Please note that no mention is made in our commitment as to the equipping of the guards as per Regulatory Guide 5.20 and for the Commission to generalize our commitment as to the arming of the guards is improper and in error.

Following our review of the legal requirements of 10 CFR 73.2, which is ambiguous, the most conservative course of action in regards to the arming of the guards appeared to be load the weapons and put an end to this continued altercation.