

JAN 20 1978

Docket No. 50-305

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

Gentlemen:

Thank you for your letter dated January 12, 1978, informing us of the steps you have taken to correct the noncompliance identified in our letter dated December 21, 1977. We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

cc: Mr. C. Luoma, Plant
Superintendent

✓ cc w/ltr dtd 1/12/78:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC

OFFICE	RIII <i>Mce</i>	RIII <i>RFW</i>	RIII			
SURNAME	Choules/bk	Warnick	Fiorelli			
DATE	1/19/78					

WISCONSIN PUBLIC SERVICE CORPORATION



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

January 12, 1978

Mr. Gaston Fiorelli, Chief
Reactor Operations & Nuclear Support Branch
Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Gentlemen:

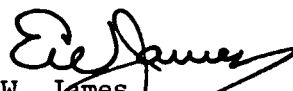
REF: Docket 50-305
Operating License DPR-43
IE Inspection Report 77-22

This refers to the referenced inspection report performed by Mr. Choules of your Staff. In the report one item of non-compliance was cited.

Infraction: "Contrary to Technical Specifications 6.5.1.6.e and 6.5.1.8, violations of Technical Specifications reported in IE Inspection Report No.'s 50-305/77-05 and 77-10 apparently were not reviewed and documented by the Plant Operations Review Committee."

Response: Effective immediately the Plant Operations Review Committee will review and document in its minutes those Technical Specification violations reported in NRC Inspection Reports. It should be noted that the response and corrective action to Inspection Report findings are determined primarily by those plant staff personnel responsible for the area inspected and copies of the transmittal are normally distributed to a majority of the PORC members. Therefore, the practical considerations of those Technical Specification requirements were met and a failure of documenting this review was the only requirement neglected.

Very truly yours,


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

EWJ:sna

JAN 16 1978

CENTRAL
FILES

Docket No. 50-305

10 1978

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:

Please replace page 9 of IE Inspection Report No. 50-305/77-22 with the enclosed page 9. The revised page contains the proper LER reference and includes omitted footnotes.

Sincerely,

Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

Enclosure: Page 9 to IE
Inspection Report No.
50-305/77-22

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

OFFICE →	RIII <i>MCU</i>	RIII <i>RFW</i>	RIII			
SURNAME →	Choules/jb	Warnick	Fiorelli <i>GF</i>			
	1/9/78					

This occurrence was identified by the licensee and adequate corrective action has been taken.

- g. LER 50-305/77-27^{8/} - Containment Spray Pump Failed to Start

The licensee's corrective action for this occurrence has not yet been completed. The inspector encouraged the licensee to get this corrective action completed as soon as possible. Completion of the corrective action will be reviewed when a similar later occurrence^{9/} is reviewed.

Review of these occurrences indicated the licensee's corrective actions or proposed corrective actions appear to be adequate and no other concerns were identified by the inspector.

The following reportable occurrences were reviewed inoffice and are considered closed.

- a. LER 50-305/77-28^{10/} - Air Leak on the Starting Air Compressor for One Diesel Generator
- b. LER 50-305/77-30^{11/} - Diesel Generator 1A Started and Stopped at Approximately 70 RPM

9. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection at the plant site on November 30, 1977. The inspector summarized the scope and findings of the inspection, including the identification of one item of non-compliance. (Paragraph 3.a)

The inspector also met with Mr. W. A. White and others (denoted in Paragraph 1) at the corporate office on November 28, 1977, and summarized his findings in regard to the review of NSRAC activities.

- 8/ LER 50-305/77-27, WPS to RIII, dtd 11/1/77.
9/ LER 50-305/77-29, WPS to RIII, dtd 11/23/77.
10/ LER 50-305/77-28, WPS to RIII, dtd 11/28/77.
11/ LER 50-305/77-30, WPS to RIII, dtd 11/23/77.



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

Docket No. 50-305/77-22

DEC 21 1977

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 Mr. N. C. Choules of this office on November 21-23 and 28-30, 1977, of activities at Kewaunee Nuclear Power Plant authorized by NRC Operating License No. DPR-43 and to the discussion of our findings with Mr. C. Luoma and others 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 twenty days of your receipt of this notice a written statement or explanation in reply, including for each item of noncompliance: (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

21 1977

copy of this letter, the enclosures, and your response to this letter will be placed in 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,

Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

Enclosures:

1. Appendix A, Notice of Violation
2. IE Inspection Report No. 50-305/77-22

cc w/encls:

Mr. C. Luoma, Plant
Superintendent
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC

OFFICE >	RIII <i>RFW</i>	RIII <i>RFW</i>	RIII			
SURNAME >	Choules/jb	Warnick	Fiorelli <i>[Signature]</i>			
DATE >	12/19/77					

Appendix A

NOTICE OF VIOLATION

Wisconsin Public Service
Corporation

Docket No. 50-305

Based on the inspection conducted on November 21-23 and 28-30, 1977, it appears that certain of your activities were not conducted in full compliance with NRC regulations as indicated below. The following item is an infraction.

Contrary to Technical Specifications 6.5.1.6.e and 6.5.1.8, violations of Technical Specifications reported in IE Inspection Report Nos. 50-305/77-05 and 77-10 apparently were not reviewed and documented by the Plant Operations Review Committee.

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

REGION III

Report No. 50-305/77-22

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, WI

Inspection conducted: November 21-23 and 28-30, 1977

RFW for
Inspector: N. C. Choules

12-20-77

RFW Warnick
Approved by: R. F. Warnick, Chief
Reactor Projects Section 2

12-20-77

Inspection Summary

Inspection on November 21-23 and 28-30, 1977 (Report No. 50-305/77-22)
Areas Inspected: Routine, unannounced inspection of review and audit, records, surveillance, plant operations, unresolved items, IE Circular followup, and nonroutine event followup. The inspection involved 39 inspector-hours onsite by one NRC inspector.

Results: Of the seven areas inspected, no items of noncompliance were identified in six areas; one apparent item of noncompliance (infraction - failure of Plant Operations Review Committee to review and document investigations of reported violations of Technical Specifications - Paragraph 3.a) was identified.

DETAILS

1. Persons Contacted

Plant

- *C. R. Luoma, Plant Superintendent
- C. R. Steinhardt, Assistant Superintendent, Operations
- *R. W. Lange, Assistant Superintendent, Maintenance
- W. S. Truttman, Operations Supervisor
- J. S. Richmond, Technical Supervisor
- D. W. McSwain, Instrument and Control Supervisor
- A. J. Ruege, Plant Performance Engineer
- K. H. Evers, Reactor Supervisor
- *M. L. Marchi, Nuclear Systems Engineer

The inspector also talked with and interviewed several other licensee employees, including members of the Operations and Plant Performance sections.

Corporate Office

- E. W. James, Senior Vice President, Power Generation and Engineering
- **W. A. White, Chairman, Nuclear Safety Review and Audit Committee (NSRAC)
- **G. V. Fitzpatrick, Quality Control Supervisor
- **G. A. Spiering, Quality Assurance Supervisor
- **M. L. Marchi, Nuclear Systems Engineer
- **J. M. Morrison, NSRAC Recording Secretary

*Denotes those attending exit interview at the plant on November 30, 1977.

**Denotes those attending exit interview at the corporate office on November 28, 1977.

2. Licensee Action on Previous Inspection Findings

- a. (Closed) Unresolved Item (IE Inspection Report No. 50-305/77-18):
No record of analysis for boric acid lot No. 9Y118. The inspector reviewed a letter of conformance from the boric acid manufacturer which indicated that lot No. 9Y118 conforms to the Westinghouse specifications for boric acid for nuclear power plants.
- b. (Open) Unresolved Item (IE Inspection Report No. 50-305/77-10):
Operation of the auxiliary feedwater system with the redundant feedwater header cross connect valves normally open. The inspector reviewed 1973 correspondence between the licensee's

A/E and Westinghouse. Westinghouse recommended leaving the cross connect valves open and the A/E concurred, and the drawings were changed to reflect this. Changing the PSAR at that time was apparently overlooked as it was not changed to indicate the valves would be open during normal operations. The licensee is performing a 10 CFR 50.59 safety review of operating with the valves open. This item will remain open pending the completion of the safety review.

3. Review and Audit

- a. Review of the minutes of the licensee's Onsite (Plant Onsite Review Committee - PORC) and Offsite (NSRAC) Review Committees for the past year verified that both committees are meeting the licensee's Technical Specifications requirements as follows:
- (1) Meeting frequency for Onsite and Offsite Review Committees.
 - (2) Meeting memberships and quorum requirements.
 - (3) Technical Specifications are reviewed as required.
 - (4) Reportable Occurrences are reviewed as required.
 - (5) Violations of facility Technical Specifications are reviewed by the NSRAC and violations identified by Incident Reports are reviewed by the PORC. However, noncompliance items identified by NRC inspections apparently are not reviewed by the full PORC Committee.

Review of the PORC minutes indicated that the PORC is not formally reviewing and documenting investigations of Technical Specifications violations identified by NRC inspections as required by Sections 6.5.1.6.e and 6.5.1.8. Specifically, noncompliance items in IE Inspection Report Nos. 50-305/77-05 and 77-10 apparently were not reviewed and documented by the PORC. This is an item of noncompliance and is an infraction.

In discussion with the licensee at the exit interview, the licensee indicated that normally some members of the PORC are involved directly with the noncompliance review of the items and corrective action, but the non-compliance items are not generally reviewed by the entire PORC.

- b. The inspector reviewed the audit programs conducted by the NSRAC, Corporate Nuclear Engineering Staff (CNES) and the Plant Performance Engineer. As allowed by the Technical Specifications, most of the audits are performed under the cognizance of the NSRAC by the Corporate QA group, which is part of CNES, and the Plant Performance Engineer. The Plant Performance Engineer performs biweekly audits of plant operations. Audits are being conducted as required by the Technical Specifications.

The inspector noted the licensee is just beginning to perform technical audits or indepth audits of procedures, surveillance tests, etc. The licensee indicated they were aware that technical audits have been lacking in the past and are now engaged in an active program of technical audits. The inspector suggested at the exit interview at the corporate office that it might be beneficial if the NSRAC got into the plant more by performing more of the audits. The licensee acknowledged the inspector's comment.

4. Records

The inspector reviewed the licensee's program of control, storage and retrieval of records to determine if the requirements of Technical Specification 6.10 and the licensee's Administrative Control Directive 9.2 were being complied with.

The inspector selected and verified that the following records were retrievable:

- a. Power range recorder charts for June 1976.
- b. Completed instrument calibration and test surveillance procedures, 043 and 044, for 1975 and 1976.
- c. Maintenance requests associated with safety injection pumps for 1973 to 1977.
- d. 1977 integrated leak rate tests and results.
- e. Battery Surveillance Tests 101 for June 1975, and 102 for March 1976.

The inspector verified that as-built drawings were changed as specified in Design Changes 496, 527 and 569.

The licensee files all maintenance requests according to system and components. This should provide information to identify long-term degradation of equipment.

No items of noncompliance or deviations were identified during the inspection of this area.

5. Surveillance

- a. The inspector selected a sampling of Technical Specifications testing requirements and verified that the licensee has surveillance test procedures which accomplished the required surveillance testing. The review of the following surveillance test procedures revealed that prerequisites and preparations for tests are specified, acceptance criteria are specified, and operational checks prior to returning equipment to service are specified when required.
- b. The following surveillance tests performed in the past year were reviewed and verified to have been completed as required:

<u>Procedure Number</u>	<u>Title or Equipment</u>
SP 046	Target Band Determination
SP 068	Reactor Coolant Boron Sample
SP 082	Reactor Coolant System Leak Rate Check
SP 101	Station Battery Monthly Test
SP 102	Station Battery Load Test
SP 105	Turbine Driven Auxiliary Feedwater Pump Test
SP 109	Diesel Generator Manual Test
SP 112	Station Battery Quarterly Test

The inspector discussed the following revisions to surveillance tests:

- c. The inspector witnessed the performance of surveillance tests SP 033, Steam Generator Flow Mismatch Instrument Channel Test and SP 082, Reactor Coolant System Leak Rate Check. No items of concern were identified.

SP 046 - Addition to the procedure to check out the target band computer alarm. The licensee stated they would review adding this checkout.

SP 102 - Clarification of the acceptance criteria. Documenting that a tightness check of battery connectors is performed and that batteries are recharged within 24 hours after the load test. The Technical Specifications require that this test establishes that all electrical connectors are tight and the FSAR states the batteries can be recharged within 24 hours. The licensee stated these revisions would be made.

SP 105 - In a previous inspection,^{1/} the inspector suggested certain changes to this test and other safety injection systems. The licensee stated they would revise the above procedure to obtain the response times from initiation to established flow. In regard to other suggested changes, the licensee stated they were revising the surveillance tests to meet the requirements of Section XI of the ASME Boiler and Pressure Vessel Code.

No items of noncompliance or deviations were identified during the inspection of this area.

6. Plant Operations

a. Plant Tour

- (1) The inspector performed a plant tour accompanied by a licensee representative. The housekeeping in the plant was very good.
- (2) During the tour, selected "Hold" and "Danger" tags were reviewed for proper approval and the status log was reviewed to determine if the tags were properly accounted for. No discrepancies were noted.
- (3) Selected dampers for the containment ventilation system were checked for proper alignment and no discrepancies were noted.

- b. The jumper-bypass log was reviewed and no discrepancies were noted.

c. Logbooks

The inspector reviewed the control room logs and shift supervisor's log for the past three months, and confirmed that entries were filled out to identify the action, and that the Operations Supervisor is reviewing and initialing the log sheets indicating his review.

d. Night Order and Temporary Orders

The current subject orders were reviewed and no discrepancies were noted.

e. Incident Reports (IRs)

The inspector reviewed IRs 77-45 through 77-64. Reportable occurrences are also included in the Incident Reports, so many

^{1/} IE Inspection Report No. 50-305/77-10.

of the IRs are reported and subsequently reviewed as reportable occurrences. The inspector noted that in several cases, the IR form was not being completed and closed out as to corrective actions for the incident identified. For reportable occurrences the corrective action may not be documented on the IR form but is documented in the licensee's report of the occurrence. Completion of the IR form was discussed in the exit interview and the licensee stated they would followup on the completion of the IR form.

f. Reactor Coolant and Steam Generator Chemistry

Subject surveillance tests for the past three months were reviewed and the records indicate that:

- a. There is no evidence of fuel failure, and oxygen, chloride and fluoride concentrations were below the Technical Specifications limits.
- b. There is no steam generator primary to secondary leakage.

No items of noncompliance or deviations were identified during the inspection of this area.

7. IE Circular Followup - 77-13

The inspector verified by discussion with the licensee that they had received and reviewed the subject bulletin. The licensee has reviewed his surveillance procedures, SPs 003, 010, 016, 030 and 033, and concluded that adequate precautions and controls exist to prevent insertion of dummy signals as described in the circular. The inspector is in agreement with the licensee's findings. The inspector suggested that the licensee circulate the circular to the instrument technicians for review. The licensee stated they would circulate IEC 77-13 to the instrument technicians.

No items of noncompliance or deviations were identified during the inspection of this area.

8. Reportable Occurrence

The following reportable occurrences were reviewed by examination of logs, records, observation of equipment, and through discussions with plant personnel. Occurrences were reviewed for completion of reporting requirements, investigation and determination of cause, proposed corrective measures, and completion of corrective actions.

- a. RO 50-305/77-20^{2/} - Containment Activity Monitor Not in Service

This occurrence was the result of an operator failing to follow procedures. The licensee identified the off-normal valve line-up which caused the containment activity monitor to be out of service and has instructed the operator on proper use of procedures.

- b. RO 50-305/77-22^{3/} - Cardox Timer on Fire Protection System Failure Resulting in Shutdown Signal to Diesel Generator 1B

- c. RO 50-305/77-23^{4/} - Fire on 1A Diesel Generator During Monthly Surveillance Test

The inspector noted in his review of the control room and shift supervisors logs that the emergency diesel generators are frequently started to prove operability when taken out of service for preventive maintenance and instrument calibrations at times different than when the monthly surveillance starting tests are performed. The inspector suggested in the exit interview that preventive maintenance and instrument calibration be scheduled to be performed during normal surveillance testing as much as possible to minimize carbon buildup in the diesel from short run times. The licensee stated they would review scheduling activities to cut down the starts on the diesel generator. It should be noted that the licensee's corrective action for this occurrence is to run the diesel generators for 4 hours each month to burn out any carbon residue. Cutting down the number of starts is added insurance against the buildup of carbon.

- d. LER 50-305/77-24^{5/} - Diesel Generator Failed to Start Due To Sticking Undervoltage Relay

In the review of this occurrence, the inspector suggested that the relays should be checked periodically and cleaned as required. The licensee stated they would add steps to Surveillance Procedure SP 009 to accomplish this.

- e. LER 50-305/77-25^{6/} - Two of Three Charging Pumps Out of Service

- f. LER 50-305/77-26^{7/} - Inadequate Implementation of Procedural Controls to Preclude Deenergizing More than One Fan Coil Unit Service Water Valve at a Time

2/ LER 50-305/77-20, WPS to RIII, dtd 8/31/77.

3/ LER 50-305/77-22, WPS to RIII, dtd 9/23/77.

4/ LER 50-305/77-23, WPS to RIII, dtd 10/20/77.

5/ LER 50-305/77-24, WPS to RIII, dtd 10/20/77.

6/ LER 50-305/77-25, WPS to RIII, dtd 11/1/77.

7/ LER 50-305/77-26, WPS to RIII, dtd 11/1/77.

This occurrence was identified by the licensee and adequate corrective action has been taken.

- g. LER 50-305/77-27^{8/} - Containment Spray Pump Failed to Start

The licensee's corrective action for this occurrence has not yet been completed. The inspector encouraged the licensee to get this corrective action completed as soon as possible. Completion of the corrective action will be reviewed when a similar occurrence^{9/} is reviewed.

Review of these occurrences indicated the licensee's corrective actions or proposed corrective actions appear to be adequate and no other concerns were identified by the inspector.

The following reportable occurrences were reviewed inoffice and are considered closed.

- a. LER 50-305/77-10^{10/} - Air Leak on the Starting Air Compressor for One Diesel Generator
- b. LER 50-305/77-30^{11/} - Diesel Generator 1A Started and Stopped at Approximately 70 RPM

9. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection at the plant site on November 30, 1977. The inspector summarized the scope and findings of the inspection, including the identification of one item of non-compliance. (Paragraph 3.a)

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