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

DEC 9 1976

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

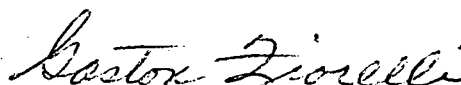
Docket No. 50-305

Gentlemen:

Thank you for your letter dated November 24, 1976, informing us of the steps you have taken to correct the noncompliance identified in our letter dated November 4, 1976. We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely yours,



Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

cc: Mr. C. Luoma, Plant
Superintendent

cc w/ltr dtd 11/24/76:
Central Files
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Local PDR
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WISCONSIN PUBLIC SERVICE CORPORATION



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

November 24, 1976

Mr. Gaston Fiorelli, Chief
Reactor Operations & Nuclear Support Branch
Office of Inspection & Enforcement
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Gentlemen:

Subject: Docket 50-305
Operating License DPR-43
IE Inspection No. 050-305/76-14

This refers to your letter transmitting the report of the referenced inspection conducted by Mr. D. R. Hunter of your office concerning the findings of the inspection of the Kewaunee Nuclear Power Plant. Infraction item A was the only item requiring a response.

Infraction A: "Contrary to Criterion V of Appendix B to 10 CFR 50, the vendor of certain safety related materials purchased and issued was not included on the licensee's approved vendor listing in accordance with approved facility procedures."

Response: Criterion V of Appendix B to 10 CFR 50 requires that documented instructions or procedures be established to provide for the appropriate quantitative or qualitative acceptance criteria for activities affecting quality. To that end, plant Administrative Control Directives (ACD's) and corporate Quality Assurance Directives (QAD's) have been established to control procurement activities. ACD 3.1 specifically requires that the Qualified Bidders List be used in purchasing type 1 material. Purchase Order 52851 was issued to purchase several types of brass and stainless steel "Swagelok" compression type fittings and several small brass instrument valves manufactured by "Whitey."

Although the fittings and valves were purchased from a distributor not on the Qualified Bidders List, all the type 1 quality controls were required by the purchasing specifications and met by the distributor. In the case of the "Swagelok" fittings, they are specifically called

November 24, 1976

out for use by the Standard Specifications for Instrument Piping Material issued by the Architect-Engineer and used for plant construction. These fittings were certified as required by the "Technical Specification of Instrument and Control Piping for Nuclear Power Plants" (TS-M523), also issued by the Architect-Engineer. The Whitey valves were also required to be certified in accordance with TS-M523, which makes them eligible for safety related applications. The use of the Whitey valves will be limited to like-for-like replacements or use in non-safety related applications.

Based upon the above, we consider that the use of these valves and fittings under the appropriate design criteria required by our Quality Assurance Program does not create a hazard to the health and safety of the general public. To establish the proper priorities and avoid misrepresentations of the purpose of the Quality Assurance program, the appropriate ACD's and QAD's will be revised to reflect that the proper controls and specifications are met when purchasing type 1 materials. To affect this the directives will require that type 1 purchases shall be made from companies either on the "Qualified Suppliers List" or shall require a documented evaluation and acceptance of the company prior to placing an order. We expect to have these changes to our directives completed in 30 days.

Very truly yours,



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

EWJ:sna

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

NOV 4 1976

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

Docket No. 50-305

Gentlemen:

This refers to the inspection conducted by Mr. D. R. Hunter of this office on October 12-15, 1976, of activities at Kewaunee Nuclear Power Plant authorized by NRC Operating License No. DPR-43 and to the discussion of our findings with Mr. Luoma 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 under Enforcement Items in the Summary of Findings section of the enclosed inspection report.

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 item of noncompliance A: (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.



Wisconsin Public Service
Corporation

- 2 -

NOV 4 1976

The inspection showed that action had been taken to correct the identified noncompliances B and C and to prevent recurrence. Consequently, no reply to these noncompliances is required and we have no further questions regarding this matter at this time.

Noncompliance identified through your management control system and corrected in a timely manner is described under Other Significant Items in the Summary of Findings section of the attached inspection report. We have no further questions regarding this matter at this time.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this notice, the enclosed inspection report, and your response to this notice will be placed in the NRC's Public Document Room, except as follows. If this report contains 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 notice, 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 yours,

Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

Enclosure:
IE Inspection Report
No. 050-305/76-14

cc w/encl:
Mr. C. Luoma, Plant
Superintendent

bcc w/encl
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
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TIC

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Operations Inspection

IE Inspection No. 050-305/76-14

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

Kewaunee Nuclear Power Plant
Kewaunee, Wisconsin

License No. DPR-43
Category: C

Type of Licensee: PWR W 1650 MWt

Type of Inspection: Routine, Announced

Dates of Inspection: October 12-15, 1976

Principal Inspector:

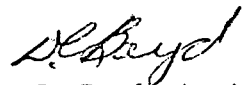

D. R. Hunter

11/02/76
(Date)

Accompanying Inspectors: None

Other Accompanying Personnel: None

Reviewed By:


D. C. Boyd, Acting Chief
Reactor Projects Section 2

11/3/76
(Date)

SUMMARY OF FINDINGS

Inspection Summary

Inspection on October 12-15, 1976, (76-14): Review of operations; reportable occurrence; annual report; design, design changes and modifications; housekeeping; procurement; records; and selected outstanding items. Three items of noncompliance were identified concerning procurement activities, temporary procedure changes, and radiation control.

Enforcement Items

The following items were identified during the inspection:

Infractions

- A. Contrary to Criterion V of Appendix B to 10 CFR 50, the vendor of certain safety related materials purchased and issued was not included on the licensee's approved vendor listing in accordance with approved facility procedures. (Paragraph 3.c, Report Details)
- B. Contrary to Technical Specification 6.8.3, a change was made to a safety related pre-startup valve checklist without the appropriate approval and subsequent review. (Paragraph 7.c, Report Details)
- C. Contrary to Technical Specification 6.13.a, a high radiation area located in the auxiliary building was not adequately barricaded. (Paragraph 2.m, Report Details)

Licensee Actions on Previously Identified Enforcement Items

None.

Other Significant Items

- A. Systems and Components

None.

- B. Facility Items (Plans and Procedures)

None.

C. Managerial Items

1. Mr. K. Smolenski has been appointed to the position of Plant Nuclear Engineer.
2. Mr. W. Winoski has been appointed to the position of Radio-chemistry Supervisor.

D. Noncompliance Identified and Corrected by Licensee

Contrary to Technical Specification 3.6.b, both doors from the auxiliary building to the shield building were blocked open degrading the shield building special ventilation system. (Paragraph 4.a, Report Details)

E. Deviations

None.

F. Status of Previously Reported Unresolved Items

None.

Management Interview

The management interview was conducted on October 15, 1976, by Mr. Hunter with the following persons present:

C. R. Luoma, Plant Superintendent
R. W. Lange, Assistant Superintendent, Maintenance
M. E. Stern, Nuclear Licensing and Systems Supervisor

- A. The inspector stated that during the review of operations the use of the jumper control procedure, ACD 5.9, revealed that the procedure did not appear to describe the method of use of the jumpers in the plant. The procedure, ACD 5.9, provides identification and location of the installed jumpers. No administrative mechanism was specifically provided for prior review and approval of jumper usage.

The licensee stated that jumpers are only installed in accordance with an approved written procedures, except during shop trouble-shooting and bench testing. The licensee indicated that the administrative procedure, ACD 5.9, would be reviewed for clarification of the use of jumpers. (Paragraph 2.d, Report Details)

- B. The inspector stated that during the facility tour, high radiation door (barricade) No. 173 was found open and the lock inoperative, high radiation door No. 172 was found closed but the lock inoperative, and high radiation door No. 174 was found loose at the bottom and allowed excessive space at the bottom opposite the latching mechanism. The three doors were key-locking, sliding fence type barricades. The inspector stated that high radiation door (barricade) No. 173 being open was considered an item of noncompliance pursuant to Technical Specification 6.13.a.

The licensee stated that the doors had been chain-locked and maintenance requests issued to repair the inoperative locking devices.

The inspector stated that the corrective actions appeared adequate and no further response was required concerning this matter.
(Paragraph 2.m, Report Details)

- C. The inspector stated that the inspection had revealed that the high-low flow alarms were blocked on radiation monitor channels R-16 (containment fan - coils) and R-20 (service water) with a temporary change request (TCR 76-31) issued. The inspector asked the licensee to review this area closely to determine the problem with the service water flow through the monitors, and to determine a permanent fix on the flow problem since the monitors are required to be operable by the FSAR, Section 11.2.3.

The licensee acknowledged the inspector's statement and request, and stated that the problem will be evaluated. (Paragraph 2.n, Report Details)

- D. The inspector stated that the inspection had revealed that a number of temporary change requests had been outstanding since as early as 1974. The inspector asked the licensee to review the Temporary Change Request/Design Change Request program to determine the problems with completing the changes more expeditiously. The inspector also expressed concern with the review of the temporary change requests by the appropriate review groups.

The licensee stated that the area would be reviewed. The licensee also stated that the temporary change requests were issued along with a design change request, and the design change requests were reviewed in accordance with the Technical Specifications. (Paragraph 2.j, Report Details)

- E. The inspector stated that the inspection had revealed that a pre-startup checklist had been changed and no temporary procedure change sheet issued to provide the appropriate approvals and reviews, and this was considered an item of noncompliance pursuant to Technical Specifications 6.8.3.

The inspector stated that the corrective actions indicated by the licensee during the inspection appeared adequate and no further information was required of this item at this time.

The licensee acknowledged the inspector's statements. (Paragraph 7.c, Report Details)

- F. The inspector stated that the review of procurement activities revealed that the purchase of certain mechanical fittings and valves were not included on the Approved Bidders List in accordance with approved procedures. The inspector stated that this was an item of noncompliance pursuant to Criterion V of Appendix B to 10 CFR 50.

The licensee acknowledged the statement and stated that the problem would be reviewed. (Paragraph 3.c, Report Details)

- G. The inspector stated that the review of the reportable occurrence concerning both shield building doors being blocked open was considered an item of noncompliance identified by the licensee, and the corrective actions completed and planned appeared adequate.

The licensee acknowledged the statement by the inspector. (Paragraph 4, Report Details)

- H. The inspector stated that the review of nonroutine reports, semi-annual reports, plant housekeeping, design change request packages, records, and certain outstanding inspection items revealed no discrepancies.

REPORT DETAILS

1. Persons Contacted

C. R. Luoma, Plant Superintendent
R. W. Lange, Assistant Superintendent, Maintenance
C. R. Steinhardt, Assistant Superintendent, Operations
J. S. Richmond, Technical Supervisor
R. R. Hirst, Maintenance Supervisor
D. M. MacSwain, Instrument and Control Supervisor
R. W. Sitzman, Maintenance Coordinator
A. J. Ruege, Plant Performance Engineer
G. L. Jarvela, Health Physics Supervisor
W. J. Truttman, Operations Supervisor
F. B. Stanaszak, Shift Supervisor
M. Reinhart, Lead Radiation Protection Man

2. Review of Operations

The inspector reviewed selected operations records and activities to determine that the plant was being operated in conformance with the administrative procedures and technical specifications. The review included:

a. Shift Supervisor Log (August 25, 1976 through October 13, 1976)

No discrepancies were noted.

b. Control Room Operator Log (September 15, 1976 through October 13, 1976)

No discrepancies were noted.

c. Night Order Book

No discrepancies were noted.

d. Jumper Logbook

The inspector's review of the jumper control Administrative Control Directive (5.9) revealed that the procedure does not address the use of jumpers, only the identification and

the location of the installed jumpers. The operations group had one jumper available and a detailed written procedure authorizing the use of the jumper on a non safety related system (main turbine turning gear). No discrepancies were noted by the inspector concerning the identification and location of jumpers.

The specific use of jumpers by the plant staff under direct administrative control will be reviewed further with the licensee at a later inspection.

e. Auxiliary Building Log (October 1-12, 1976)

No discrepancies were noted.

f. Turbine Generator and Auxiliary Equipment Log (October 1-12, 1976)

No discrepancies were noted.

g. Auxiliary Building Filter Log (October 1-12, 1976)

No discrepancies were noted.

h. Circulating Water Log - Computer (October 1-13, 1976)

No discrepancies were noted.

i. Computer Logs (September 1, 1976 through October 11, 1976)

No discrepancies were noted.

j. Temporary Change Request Log

The inspector noted that the following selected temporary changes were outstanding:

- (1) TCR 74-33 - Deenergize alarm units for abnormal indicated service water flow to the containment fan coil units (November 12, 1974).
- (2) TCR 74-41 - Boric acid heat tracing alarms to the sequence of event recorder removed (November 22, 1974).

- (3) TCR 75-8 - Accumulators 1A and 1B level alarms (March 20, 1975).
- (4) TCR 75-36 - Boric acid tank lo-lo alarm setpoint change (September 11, 1975).
- (5) TCR 75-47 - Boric acid tank lo-level alarm setpoint change (October 30, 1975).

The inspector reviewed the temporary change requests with the shift supervisor on duty and no discrepancies were noted.

k. Tagout Log

No discrepancies were noted.

l. Temporary Procedures

No discrepancies were noted.

m. High Radiation Doors

During the facility tour, the inspector noted that high radiation door No. 173 to the letdown heat exchanger area was open. The inspector noted also that the locks on two sliding-type doors were inoperative (door No. 173 and door No. 172).

The inspector and the licensee representative notified the Health Physics Supervisor. The Shift Supervisor was notified, the doors were chain-locked and maintenance work orders issued to repair the inoperable locking devices.

Records review revealed the radiation levels in the area to be between 100 and 1000 mrem per hour. High radiation door No. 173 being open, thus removing the radiation barricade, is considered an item of noncompliance pursuant to Technical Specification 6.13.a and is an infraction.

The corrective actions taken by the licensee are considered adequate and no further questions are required of this matter at this time.

n. Radiation Monitoring Channels

The inspector noted that Temporary Change request cards were attached to radiation monitor channels R-16 (containment

fan - coils) and R-20 (service water). The TCRs indicated that the high-low flow alarm setpoints were defeated on the service water sample flow paths.

The inspector verified that the licensee was providing increased surveillance on the flow indicators and that acceptance criteria was being generated for each flow path.

Due to sand in the service water system, these radiation monitors have apparently been a continuous problem due to flow blockage to the monitors. An investigation is ongoing by the licensee.

This item will remain open pending further investigation and evaluation by the licensee.

o. Primary and Secondary Chemistry

The review of selected primary and secondary chemistry records revealed no discrepancies.

p. Shift Relief and Turnover

No discrepancies were noted.

q. Control Room Manning

No discrepancies were noted.

3. Procurement

The inspector reviewed procurement activities to be performed in accordance with administrative procedures and regulatory requirements. The review included:

a. Operational Quality Assurance Procedures.

b. Administrative Control Directives.

c. Purchasing Activities

- (1) Purchase Order 053056, 1" ASCO Valves, Auxiliary Feedpump Modification, DCR 251.

No discrepancies were noted.

- (2) Purchase Order 0502930, GE electrical overload heaters, for general use in safety related switchgear.

No discrepancies were noted.

- (3) Purchase Order 053053, General use 304 stainless steel cable.

No discrepancies were noted.

- (4) Purchase Order 052851, swagelock valves and fittings, for general use in safety related systems.

The inspector's review of this activity revealed that the purchase from Badger Valve Company of the subject fittings, for general use, included purchase specifications and material certifications; but neither the vendor nor the material were on the Approved Bidders List. The failure to follow approved written procedures (ACD 3.1) resulting in the purchase and issue of materials, not on the Approved Bidders List, is considered an item of noncompliance pursuant to Criterion V of Appendix B to 10 CFR 50 and is an infraction.

4. Nonroutine Event Reports

The inspector reviewed the following reportable occurrence to assure adequate review, evaluation, corrective actions and reporting.

RO 76-15, Both doors of the auxiliary building to the shield building were blocked open.

The licensee reported^{1/} that both doors from the auxiliary building to the shield building were blocked open which could prevent the shield building special ventilation system from drawing a vacuum in the shield building annulus around the containment.

The inspector reviewed the event and determined that the doors were blocked open by plant personnel and the open doors were discovered by the shift supervisor on routine plant tour.

The doors were closed and reported to management. The event is considered an item of noncompliance pursuant to Technical Specification 3.6.b.

The licensee's corrective actions include discussions with plant personnel and replacement of the caution signs with more forceful, demonstrative signs.

^{1/} Ltr, WPS to IE:III, dtd 10/1/76.

The licensee's corrective actions are considered adequate and no further questions are required concerning this matter at this time.

5. Semiannual Reports

The inspector reviewed the licensee's semiannual reports^{2/3/} to ascertain that the information reported was as required by Technical Specifications 6.6.1.b and 5.4.a, and Administrative Control Directives 2.9 and 2.10.

The inspector noted that Administrative Control Directives 2.9 and 2.10 are presently under review and evaluation to update the procedures to be in accordance with the new Technical Specifications and organizational requirements.

No discrepancies were noted.

6. Plant Housekeeping

The inspector reviewed the general plant housekeeping conditions and methods utilized to maintain cleanliness during normal operations and maintenance.

No discrepancies were noted.

7. Design Change Requests

The inspector reviewed selected completed design change request packages to determine that the modifications were completed in accordance with administrative procedures and regulatory requirements. The review included:

- a. Operational Quality Assurance Procedures.
- b. Administrative Control Directives.
- c. Design Change Activities

- (1) DCR-233, Installation of power supply filters in all nuclear instrumentation and radiation monitor channels.

No discrepancies were noted.

2/ Ltr, WPS to IE:III dtd 8/21/75.

3/ Ltr, WPS to IE:III, dtd 2/26/76.

- (2) DCR-84, Installation of door knobs and latches on personnel and emergency air lock doors.

No discrepancies were noted.

- (3) DCR-267, Drawing change to indicate the throttled and locked safety injection valves.

The inspector's review of the activity included the drawing change and the pre-startup valve checklist. The valve position on the pre-startup checklist indicated the valves to be "OPEN." The inspector discussed the activity with the licensee representative.

This item will remain open pending completion of an evaluation by the licensee.

During the review of another pre-startup valve checklist by the inspector and the licensee representative to verify the licensee's wording concerning "LOCKED" valves, an unauthorized change to the pre-startup checklist was revealed. Valve CI-1010 position had been changed from "LOCKED OPEN" to "LOCKED CLOSED" on Pre-startup Checklist N-ICS-23-C. The failure to obtain the required approvals and subsequent reviews in accordance with the approved procedures is considered an item of noncompliance pursuant to Technical Specification 6.8.3 and is an infraction.

The licensee issued a temporary procedure change sheet in accordance with approved procedures and reviewed the item with the appropriate personnel. A corrected startup checklist is being provided by the operations group in accordance with approved procedures. The licensee's corrective actions are considered adequate and no more information is required of this item at this time.

- (4) DCR-501, 4160V switchgear breaker guidebar modification.

No discrepancies were noted.

- (5) DCR-363, Modification of the manipulator crane gripper guide pins to facilitate handling of slightly bowed fuel assemblies.

No discrepancies were noted.

- (6) DCR-278/413, Modification of charging pump discharge pipe relief valve pipe nipples.

No discrepancies are noted.

8. Outstanding Items

The inspector reviewed selected outstanding items to verify adequate licensee actions.

a. Main Feedwater Pump Vibrations

The main feedwater pumps^{4/} have operated very successfully following suction line piping modification on one of the pumps and installation of seven vane impellers in both pumps.

No further questions are required of this matter at this time and this item is considered closed.

b. W-2 Switches

No further failures have been encountered with the W-2 switches.^{5/}

The licensee's corrective actions include replacement of each switch as a problem occurs.

No further questions are required of this matter at this time and this item is considered closed.

c. Makeup Water Demineralizer Post Filter

The licensee has issued DCR-443 to install a post filter^{6/} in the makeup water line to the condensate system to prevent carryover of resin into the system and subsequently into the auxiliary feedwater system^{7/} and into the steam generators during auxiliary feedwater system operation.

No further questions are required of this matter at this time and this item is considered closed.

d. Limitorque Valve Operator Failures

The licensee has installed grease reliefs on selected limitorque operators which had failed^{8/9/} previously. No further failures have been encountered and no further action is planned by the licensee at this time.

^{4/} IE IR No. 050-305/76-05.

^{5/} IE IR No. 050-305/75-19.

^{6/} Ibid.

^{7/} AO 050-305/75-20.

^{8/} AO 050-305/75-14.

^{9/} IE IR No. 050-305/76-05.

No further questions are required of this matter at this time and this item is considered closed.

9. Operational Event

On August 29, 1976, the core delta flux changed from, -3.90 to +1.12 (5.02%) in less than 12 hours.^{10/} The inspector reviewed the method utilized by the control room operators to monitor and plot the change in the core delta flux. The review determined that the operators has plotted a change in the core delta flux of 5.0% within 12 hours, which is within the Technical Specifications requirement. The licensee had determined the change in the core delta flux 5.02% during a subsequent review of the computer logs.

The inspector determined that the change in the core delta flux was being monitored by operations adequately and the plant was operated within the Technical Specifications during the event.

The licensee is considering a reduction in the administrative limit on the change in the core delta flux. The operators have been instructed to monitor the computer printouts closely when the administrative limit for the change in core delta flux is approached to insure the plant remains within the Technical Specifications limit as indicated by the computer printout.

The licensee evaluation and actions concerning this item are considered adequate and no further information is required at this time.

10. Records

The inspector reviewed selected plant records to ascertain that licensee control, storage, retention, and retrieval were in accordance with administrative and regulatory requirements.

- a. Pressurizer Level Chart.
- b. Pressurizer Pressure Chart.
- c. Boric Acid Makeup Flow Chart.
- d. Selected Design Changes Activities (DCRs).
- e. Selected Maintenance Activities (MWRs).
- f. Selected Operating Records (Logs, Logbooks and Logsheets).

No discrepancies were noted.

10/ Ltr, WPS to IE:III dtd 9/29/76.