WISCONSIN PUBLIC SERVICE CORPORATION

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

August 20, 1980

Mr. R. F. Heishman, Chief
Reactor Operations and Nuclear Support Branch
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Sir:

Docket No. 50-305
Operating License DPR-43
IE Inspection Report No. 80-15

This is in response to the alleged items of non-compliance, an infraction, cited in the referenced Inspection Report. The alleged infraction states:

> Technical Specification 6.8.1 states, that "Written procedures and administrative policies shall be established, implemented and maintained that meet the requirements and recommendations of Section 5.1 and 5.3 of ANSI 18.7-1972." Section 5.1.6.1 of ANSI 18.7, 1972, states that "Maintenance that can affect the performance of safety-related equipment shall be properly preplanned and performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances. . .".
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> Kewaunee Nuclear Power Plant ACD 5.2, Revision C, dated February 1, 1978, states under 5.1 and 5.1.2 Required Procedures, "Corrective Maintenance Procedures or Corrective/Repair Maintenance Procedures shall be prepared for components in safety related systems that need repair or replacement, when the type of maintenance is outside the scope of the vendors' manual, PMP or a GMP."
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> Contrary to the above, extensive repairs and a modification were made to the 1B Residual Heat Removal Pump during the period of May 25, 1980 - June 1, 1980. This work was performed without an approved procedure.

RESPONSE:

As stated in the above citation, Administrative Controls have been established at the Kewaunee Plant to ensure that required safety related repair work be properly controlled and documented in accordance with Technical Specifications and ANSI 18.7, 1972.

Where applicable, the Plant Operations Review Committee (PORC) reviews and approves all safety related procedures, including one-time maintenance repair procedures. Members of the PORC routinely review all Work Requests to ensure safety related maintenance has been performed in accordance with approved procedures.

In the above cited incident the Plant Manager and members of PORC were aware of the type and extent of repairs required for the RHR pump. A specific repair procedure was not considered necessary. Replacement of a pump impeller and pump seals is not considered abnormal and is within the scope of vendors' manual repairs. The machining of a new sleeve for the pump impeller shaft and the pump casing is considered within the skills of a qualified machinist. Dimensions and tolerances were well documented in the Work Request package. A procedure for this work would not have added any degree of safety to the end result. Furthermore, as stated in the inspection report, the work was completed overseen by a pump vendor representative; and plant Quality Control Technicians followed the work for adherence to good QA/QC practices.

As a final verification of proper maintenance, an operational test was performed and proved satisfactory prior to releasing the pump for operation. During the entire period of repair, the plant was in a mode of operation where the pump was not required operable by Technical Specifications.

The above demonstrates that adequate planning and documentation existed during the repair of the RHR pump; and the intent of ANSI 18.7, 1972, Section 5.1.6.1, and the Kewaunee Technical Specifications were met. We feel that our existing administrative controls are adequate to identify and require maintenance repair procedures when necessary. The PORC has, in the past, and will continue to be overly conservative in establishing requirements for repair procedures. We, therefore, feel our program is and has been in full compliance with regulations and our Technical Specifications.

Very truly yours,

E. R. Mathews

E. R. Mathews, Vice President
Power Supply & Engineering

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