

WISCONSIN PUBLIC SERVICE CORPORATION



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

January 7, 1981

Mr. James G. Keppler, Reg Dir
Office of Inspection & Enforcement
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Gentlemen:

Docket No. 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
IE Inspection Report 50-305/80-23, November 13, 1980

The attachment to this letter addresses the alleged items of non-compliance cited in the referenced Inspection Report. For each item, the corrective action taken, if relevant, corrective action to avoid further non-compliance and the date the corrective action is to be completed is given. Exception is taken to several alleged items of non-compliance, even though we recognize the significance of the issue and, therefore, have proposed steps to increase our level of quality control in these matters. Paragraph 14c listed examples of potential non-compliance items associated with In-service testing. We take exception to several of these items and are pursuing them with the Resident Inspector and NRC, Washington.

Very truly yours,

A handwritten signature in cursive script, appearing to read "E. R. Mathews" with a flourish underneath.

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

snf

Attach.

cc - Mr. Robert Nelson, NRC Resident Inspector
RR #1, Box 999, Kewaunee, WI 54216

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ATTACHMENT

RESPONSE TO ITEMS OF NON-COMPLIANCE

ITEM 1. - WRITTEN PROCEDURES TO CONTROL QUALITY PRACTICES

a. Calibration Control

In the situation cited an up-to-date calibration sticker was not affixed to a properly calibrated reference instrument. Furthermore, that instrument was used to calibrate other instruments. Since the referenced instrument was in proper calibration, this time should not be an item of non-compliance. However, the fact that the instrument was used and the out-of-date sticker was not noticed could lead to a potential loss of control within the calibration of equipment program. Procedures for calibration control were reviewed and deemed adequate. Instrument and control personnel will be refreshed in calibration control methods to prevent future occurrences. This review will be completed by January 31, 1981.

b. Surveillance Procedure Exception Reports

The purpose of Exception Reports is to call to the attention of responsible supervision the performance of equipment outside the tolerances of the specifications cited in the surveillance procedures, so that proper evaluation, repair or procedure revision can be accomplished. The ACD as written properly identifies this action. Maintenance and I & C personnel engaged in the performance of surveillance procedures will be reminded of these requirements so that similar incidents can be avoided in the future. This review will be completed by January 31, 1981.

c. Calibration of SI Pump Suction Gauges

All equipment and instruments that have a significant effect on the safe operation of the plant are calibrated under surveillance procedures

in order to ensure the sufficient quality control and maximum attention to documentation of discrepancies. All instruments of lesser importance or instruments which are convenient but non-essential in nature are controlled through less regimental ICP's. Non-conformance reports are not required by Administrative Control Directives for ICP's. It is the function of the Instrument and Control Group to calibrate and provide accurate instrumentation for operations. The paperwork burden would be overly cumbersome and detract from safety if all non-essential instrumentation discrepancies had to have the paperwork and review required of instruments under the surveillance program. Therefore, we have attempted to identify and place into the surveillance program all significant safety instrumentation. It should be noted that the I & C supervisor reviews all ICP's for acceptance criteria. His review is documented by initialing the procedure.

For the instrument identified, we feel it is properly placed in the ICP program, and the judgment of the qualified, trained I & C man and I & C supervisor is acceptable. If additional repair or replacement was required it would have been determined by this review. We do not consider this item as a non-compliance.

ITEM 2. - ANALYSIS OF PLANT NON-CONFORMANCES

All plant non-conformances and QA audit NRC's will be reviewed at periodic staff meetings by all department heads. In order to proceduralize this review, Administrative Control Directives are being revised to require the QC Supervisor to log all Receiving Inspection Reports and Non-Conformance Reports and to issue an annual report identifying trends and repetitions to the Plant Manager and Corporate QA. Letters will be written to vendors who show a history of repetitive discrepancies. This procedure will be revised by January 31, 1981.

ITEM 3. - PROCUREMENT CONTROL

Corrective measures have been taken to prevent future occurrences of this non-compliance. Corporate QA staff reviews all QA Type I purchase orders to determine if QA program requirements, right of access, and 10 CFR 21 requirements apply to specific orders. For those orders identified as applicable, the proper statements will be placed on the order. Refresher training on these requirements, has been given to the corporate QA staff.

ITEM 4. - RECORDS CUSTODIAN AND PERSONNEL ACCESS LIST TO QA VAULT

The QA Records Technician has been designated as Records Custodian. He will be responsible for seeing that the vault remains locked when not in attendance. Administrative Control Directives will be revised to incorporate this position and to include a list of people allowed access to the vault by January 31, 1981.

ITEM 5. - FIELD CHANGES, MWR and DCR PROGRAMS

The Design Change Program and Maintenance Work Request Program have been reviewed and deemed adequate and appropriate. The requirements of the Maintenance Work Request Program and Design Change Program have been reviewed with those personnel responsible for and cognizant of maintenance repairs so that changes that should be done under the DCR program will be identified and given the proper reviews commensurate with the change. This review has been completed.

ITEM 6. - TRAINING

The requirements of Criterion II of 10 CFR 50, Appendix B states that indoctrination and training of personnel performing activities affecting quality be performed such that suitable proficiency is achieved and maintained. WPS and the Kewaunee Plant through its history of a well operated and maintained plant, as evidenced by its operating record compared to other nuclear power plants, meet the requirements of this criterion. Where others have gone on to document, in detail, training requirements and paperwork achievements, Kewaunee personnel have spent their efforts in actual improvement in the qualifications and abilities of its personnel.

We have committed to establish programs, specify and document achievements and attempt to define complete qualification standards for various plant disciplines:

To date, we have proceeded to add three new Training Technicians since these commitments were originally made with the QA program submittal. With industry demands on personnel as high as they have been this past year and a half, we have just one technician and were not able to hire the other two until recently, thus progress in this area is slow. We continue to recognize our need for formalized programs should a major turnover in plant personnel occur, and are, therefore, attempting to proceed as rapidly as possible without sacrificing the quality and level of ability we have achieved. Since it has not been demonstrated that we do not meet the criterion of Appendix B, and since no time commitment had been given to fulfill the upgrading of our documentation of these training programs, we do not feel we are in non-compliance of this item. We

will proceed as expeditiously as possible in this commitment, and if no setbacks in staffing occur, would expect to have programs developed by December 31, 1981.

ITEM 7. - ADMINISTRATIVE CONTROL OF ELECTRICAL JUMPERS

The Administrative Control Directives controlling Temporary Changes and Corrective/Repair Maintenance Procedures will be revised to specify the requirement for those procedures to include independent verification of the installation and removal of electrical jumpers. This revision will be completed by March 1, 1981.

ITEM 8. - PROCUREMENT DOCUMENTS

a. Items Released Prior to Receipt of Documents

We have implemented controls such that all QA Type 1 material is under QC control until all documentary evidence of its conformance to the procurement documents have been received and reviewed. Administrative Control Directives and the Receiving Inspection Report form are being revised to ensure similar occurrences as noted in the referenced inspection report will not occur. This revision will be completed by January 31, 1981.

b. Non-Conforming Items Released Before Proper Review and Sign Off

This is not an item of non-compliance but appears to be a misunderstanding generated by an ambiguity in our records. Because of the flow of paperwork and sign off procedures, it appears that material gets released prior to QC Supervisor review and sign off, although this is not the case. Revision of the review and sign off form and discussion of the requirements with the QC Clerk should clear up any further discrepancies in this matter. Action on this item is complete.