

## WISCONSIN PUBLIC SERVICE CORPORATION



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

June 30, 1981

Mr. R. F. Heishman, Acting Director  
Division of Resident and Project Inspection  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Heishman:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
I & E Inspection Report No. 81-05

The subject inspection report presents the findings of an inspection conducted at the Kewaunee Nuclear Power Plant by Messrs. R. L. Nelson and B. E. Fitzpatrick of your office. Three items of noncompliance, identified as Severity Level V violations, were cited. These noncompliances, and our responses, follow:

- 1) "The Code of Federal Regulations, 10 CFR 50.72(a) and (a)(8) states: that for any event resulting in "any accidental, unplanned, or uncontrolled radioactive release," the licensee shall notify the NRC Operations Center as soon as possible and in all cases within one hour by telephone of the occurrence." "Contrary to the above, an unplanned release of radioactive gas from the "B" waste gas decay tank occurred during the approximate time period of 6:00 p.m. to 8:30 p.m. on April 25, 1981. This event was not reported to the NRC."

RESPONSE

When the shift supervisor became aware of the inadvertent venting of the gas decay tank, he promptly isolated the vent path and requested a containment atmosphere sample. Since a sufficient amount of time had occurred for the decay and dilution of the gas decay tank effluent in the containment atmosphere, the results of the requested sample analysis indicated no detectable airborne gaseous activity. Based on this information, the shift supervisor considered the event not reportable.

Through discussions with operations and health physics personnel associated with this event, we realized that the H-P personnel were aware of an increase in containment activity during the time that the gas decay tank venting occurred. The H-P personnel had noticed this as a result of their normally scheduled sampling. It should be noted that the activity level measured in the air samples were considerably lower than levels encountered during the normal purging and venting operations. This fact reduced the significance of the activity in the H-P's point of view.

We have concluded that the reasons for not reporting this occurrence were complex and largely due to less than ideal communications between the plant personnel. To prevent recurrence of events of this nature, this incident and the events leading up to it have been discussed with the supervisors to stress the necessity of prompt, accurate, and complete communications.

- 2) "Technical Specification 6.8.1 states: "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 N18.7-1972." Section 5.3 states in part: "Nuclear power plants shall be operated in accordance with written procedures. These procedures shall provide an approved preplanned method of conducting operations to minimize reliance on memory." "Administrative Control Directive 4.2, Operating Procedures, states in paragraph 5.5.1: "Each Shift Supervisor shall insure that during his assigned shift all operation of Plant Systems are conducted in accordance with the applicable currently approved operating procedure, unless an approved temporary Operating Procedure is outstanding." "Contrary to the above, on April 25, 1981 while performing Operating Procedure N-SI-33 (Filling and Draining and Pressurizing and Venting the Safety Injection Accumulators) the precaution 2.4 of the procedure was not implemented, resulting in an unplanned release of radioactive gas to the Containment. The containment purge supply and exhaust fans were in operation to facilitate refueling operations."

#### RESPONSE

The subject operating procedure, N-SI-33 (Filling and Draining and Pressurizing and Venting the Safety Injection Accumulators) was reviewed with affected operations personnel to emphasize the importance of the precautions presented in this, and every, procedure. The procedure itself is deemed adequate to prevent the inadvertent release had it been strictly followed.

- 3) "The Code of Federal Regulations, 10 CFR 50.59(b) states, in part, "The licensee shall maintain records of changes in the facility, to the extent that such changes constitute changes in the facility as described in the Safety Analysis Report. These records shall include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question." "Contrary to the above, on July 6, 1979, the licensee issued checklist N-SI-33 CL, Revision H (Safety Injection System Prestartup) which requires the facility's safety injection valves (SI-302A & B) to be placed in the open position for plant power operation. This constitutes a change to the facility as described in the final safety analysis report, and was made without a written safety evaluation which provided the basis for the determination that the change was not an unreviewed safety question."

RESPONSE

At the time of issue of Rev. H of N-SI-33 CL (Safety Injection System Prestartup) the only available administrative vehicle for documenting a safety evaluation was the Design Change (DCR) program. Although an informal review was performed, it was not considered appropriate to make a change such as this checklist and valve position under the DCR program. Thus a documented Safety Evaluation was never completed. A formal Design Change has been initiated to document the safety evaluation for this change. In order to provide an appropriate means of documenting the safety reviews for 10 CFR 50.59 "Changes, tests and experiments" in the future, we have begun a comprehensive review of our administrative procedures and will revise them as necessary to accomplish this. These revisions will be made by August 1, 1981.

Very truly yours,



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

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

Subscribed and Sworn to  
Before Me this 30th Day  
of June, 1981

  
Notary Public, State of Wisconsin

My Commission Expires

**August 30, 1981**

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