U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-305/85017(DRS)

Docket No. 50-305 License No. DPR-43

Licensee: Wisconsin Public Service Corporation
P.O. Box 1200
Green Bay, WI 54304

Facility Name: Kewaunee

Inspection At: Kewaunee, WI

Inspection Conducted: November 5-7, 1985

Inspectors: Thomas E Taylor
T. E. Taylor 12-2-85
Date

N C Choules
N. C. Choules 12-2-85
Date

Approved By: F. C. Hawkins, Chief
Quality Assurance Programs
Section 12/2/85
Date

Inspection Summary

Inspection on November 5-7, 1985 (Report No. 50-305/85017(DRS))
Areas Inspected: Routine, announced inspection relative to the implementation of Generic Letter (GL) 83-28 in the areas of equipment classification, vendor interface, post-maintenance testing, and reactor trip system reliability. Licensee actions on previous inspection findings were also reviewed. The inspection involved a total of 48 inspector-hours onsite by two NRC inspectors.
Results: No violations or deviations were identified.

DETAILS

1. Persons Contacted

Wisconsin Public Service Corporation

C. Steinhardt, Plant Manager
K. Evers, Assistant Manager, Plant Operations
R. Pulec, Plant Technical Supervisor
*D. Masarik, Operations Assessment Supervisor
*D. Berg, Superintendant, Plant Quality Control
*J. Krueger, Nuclear Design Change Coordinator
*K. Weinhauer, Superintendant, Plant Maintenance
*D. Molzahn, Nuclear Systems Supervisor
*R. Lange, Assistant Manager, Plant Maintenance

In addition, a number of other plant personnel were contacted.

*Denotes those present at the exit interview on November 7, 1985.

2. Action on Previous Inspection Findings

a. (Closed) Open Item (295/83014-01): Weaknesses in the work request (WR) procedure and WR form. The licensee had revised work request procedure No. ACD 5.4 to include both instructions on actions to take if a maintenance activity exceeded the original scope specified on the WR, and requirements for Fire Marshall review of WRs. No action had been taken on the other items because the licensee had not experienced any problems in these areas and did not believe any further action was needed. Based on the lack of problems the inspector accepts the licensee's position and this open item is considered closed.

b. (Closed) Open Item (305/83014-03): Motor operated valve procedures lacked acceptance criteria for amperage readings. The licensee had prepared a data sheet which included acceptance criteria for amperage readings. The data sheet will be included as part of the documentation package for motor-operated valve maintenance.

c. (Open) Open Item (305/84020-01): Weaknesses in the design change program. The licensee had revised design change procedure No. ECD 4.1 to address three of the four items identified. The one item that was not addressed in the revision regarded the items listed in Section 6.3.1 of ANSI N45.2.11 relative to design review. The licensee is planning to revise and divide procedure ECD 4.1 into several procedures. Included in one of the new procedures will be ANSI N45.2.11 design review items. This item will remain open pending the revision of ECD 4.1.

d. (Closed) Violation (305/84020-02): Failure to followup on audit findings within 30 days. The licensee had revised procedure QAD 11.2 to require better followup on responses to audit finding as stated in their response to this item dated February 8, 1985. Review of the licensee's open audit finding list indicated that findings were being responded to within 30 days.

e. (Closed) Open Item (305/84020-03): The Nuclear Safety Review and Audit Committee Charter and other committee documents did not outline the committee's responsibilities in relation to the audit program. Review of the committee's meeting agenda and minutes for the past year showed that items were specified and reviewed regarding the audit program. The agenda and minutes furnished sufficient evidence that the committee had maintained cognizance over the audit program. The charter, however, had not been revised to reflect the committee's actual practices. Licensee personnel agreed to make this revision. Based on improvements in the committee's review of the audit program and the agreement to revise the charter, this item is considered closed.

3. Review of Generic Letter 83-28 Activities

a. Equipment Classification

Through review of procedures, discussions with licensee personnel, and review of records, the inspector determined that the licensee's programs for equipment classifications met the requirements of Generic Letter (GL) 83-28, Sections 2.1 and 2.2.

The licensee's responsibilities and requirements governing the control and documentation of changes to equipment classification is described in Procedure No. QAD 4.3, "Changes to Quality Assurance QA Type and EQ Classification." The licensee's QA Typing Committee approves the changes to equipment classifications. The inspector's review of several work requests, test records, and procurement documents indicated no evidence of incorrectly classified components.

b. Vendor Interface

Through review of procedures, review of records, and discussions with licensee personnel, the inspector determined that the licensee's administrative programs for vendor interface are adequate to meet the requirements of GL 83-28, Sections 2.1 and 2.2.

At the Kewaunee facility, proceduralized programs are used for vendor technical information control: the nuclear plant reliability data (NPRD) System, and an information and operational experience review program.

The information and operational experience review program is used by the licensee to review technical information, such as INPO documents, NRC bulletins and circulars, and Westinghouse technical notices. Although the administrative guidelines of Procedure No. ACD 8.7, "Information and Operational Experience Review Program", are adequate, there is a large backlog of items to review and recommended actions to implement. There are approximatly 65 NRC items, 110 INPO items, and 13 Westinghouse items. The inspector is concerned that the items are not being appropriately prioritized to ensure their expeditious evaluation and implementation. This item is considered open pending further review (50-305/85017-01(DRS)).

c. Post-Maintenance Testing

Through review of procedures, discussions with personnel, and review of maintenance records, the inspector determined that the licensee's program for post-maintenance testing is adequate to meet the requirements of GL 83-28, Sections 3.1 and 3.2.

The licensee uses the work request process for initiation and approval of post-maintenance testing. The shift supervisor, nuclear simulator supervisor and group supervisors are responsible for identifying and approval of post-maintenance testing activities. The work request process is administratively controlled by procedure No. ACD 5.4, "Work Request."

During the review of several completed work requests, the inspector noted that in some instances it is not documented that motor-operated valves are cycled to show operability after maintenance is performed. This item is considered open pending further review (50-305/85017-02(DRS)).

d. Reactor Trip System Reliability

Through review of surveillance procedures, test records and discussion with licensee personnel, the inspector determined that the licensee is in compliance with the requirements of GL 83-28, Section 4.5.1.

The licensee performs a monthly reactor protection logic train surveillance which verifies that the reactor trip breakers (RTB's) trip due to the de-energization of the undervoltage trip assembly (UVTA). Also, a yearly functional breaker test and maintenance activity is performed on the RTB's. The procedure used for this activity includes the applicable Westinghouse guidelines. Due to the recent events at D.C. Cook and subsequent IE Bulletin No. 85-02, "Undervoltage Trip Attachments of Westinghouse DB-50 Type Reactor Trip Breakers," the licensee is making changes to the frequency at which RTB's UVTA's are force margin tested.

4. Followup to Reactor Trip Breaker Test Failure Event

On November 7, 1985, the licensee was conducting undervoltage trip assembly (UVTA) force margin tests for the DB-50 reactor trip breakers (RTB's) as required by IE Bulletin No. 85-02. At approximately 10:10 AM, reactor trip bypass breaker "B" failed the trip force margin test. The licensee isolated the breaker and discussed a course of action with NRC representatives. The licensee then proceeded to test the remaining RTB's. Reactor trip breaker "A" was tested next and also failed the test. A new spare DB-50 breaker was tested satisfactorily and installed in the reactor protection system (RPS) in substitution for the failed "A" RTB. Reactor trip breaker "B" was tested next: it tested satisfactorily and was returned to service. The licensee then proceeded to troubleshoot the two failed breakers.

The IE Bulletin force margin test requires the breaker to trip with a 20 oz. weight attached to the trip bar. Westinghouse guidelines specify 16 to 20 oz. as acceptable. The "B" bypass breaker retested satisfactorily, lubrication of the UVTA was a possible cause of the initial test failure. The "A" RTB would trip with 16 oz. attached to the trip bar but would not trip with 20 oz.. RTB "A" was retested and with lubricating the UVTA the breaker would trip with 18 oz. attached to the trip bar. The UVTA for the "A" breaker will be replaced and the breaker tested again.

The licensee is going to perform the UVTA force margin test monthly and has instructed the operators to manually trip the RTB's upon receipt of an RPS scram signal. These activities will continue until the shunt trip modification is installed during the spring, 1986 refueling outage. The shunt trip modification enables the RPS system to trip the RTB's by simultaneously de-energizing the UVTA and energization of the shunt trip device. This dual action facilitates an added margin of safety for RTB operation. This event will be reviewed further upon receipt of the subject licensee event report.

5. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. Open items disclosed during the inspection are discussed in paragraphs 3.b. and 3.c.

6. Exit Interview

The inspector met with licensee representatives listed in Paragraph 1, on November 7, 1985, and summarized the purpose, scope and findings of the inspection. The inspector discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee did not identify any such documents or processes as proprietary.