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# **WISCONSIN PUBLIC SERVICE CORPORATION**

February 5, 1986

Mr. William S. Little  
Chief, Operations Branch  
Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Little:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Response to Notice of Violation in Inspection Report 50-305/85-16

Reference: Letter from N. J. Chrissotimos (NRC) to D. C. Hintz (WPSC) dated  
January 6, 1986, Inspection Report 50-305/85-016

The attachment to this letter details our response to the item of non-compliance  
identified in inspection report 50-305/85-016.

Very truly yours,

*Carl M. Hintz*

D. C. Hintz  
Manager - Nuclear Power

GWH/jms

Attach.

cc - Mr. G. E. Lear, US NRC  
Mr. Robert Nelson, US NRC

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Response to Notice of Violation  
Inspection Report 50-305/85-16 (DRP)

Item of Noncompliance:

As a result of the inspection conducted during the period of October 16 - December 31, 1985, and in accordance with the "General Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the following violation was identified:

Kewaunee Technical Specifications (KTS) 1.e, states, in part: "A system or component is operable or has operability when it is capable of performing its intended function within the required range. The system or component shall be considered to have this capability when: (1) it satisfies the Limiting Conditions for Operation defined in Specification 3, and (2) it has been tested periodically in accordance with Specification 4 and has met its performance requirements."

KTS 1.i.2, states: "A channel functional test consists of injecting a simulated signal into the channel as close to the primary sensor as practicable to verify that it is operable, including alarm and/or trip initiating action."

Specification 3, Table 3.5-2, Item No. 4, of the Technical Specifications requires that the plant be maintained in hot shutdown if no Nuclear Flux Source Range Channels are operable. Specification 4, Table 4.1-1, Item No. 3 further requires that the Bistable action (alarm, trip) for the Nuclear Source Range be tested prior to each startup if not done during the previous week.

Kewaunee Surveillance Procedure No. 48-008, Rev. I, "Source Range Channel Test Shutdown" is the implementing procedure for meeting the requirements of KTS, Table 4.1-1, Item No. 3.

Contrary to the above, the plant was returned to power operation on November 14, 1985, following a plant trip on November 13, 1985, without properly performing SP 48-008, that is, the testing of the Source Range High Flux Trip was not conducted. Failure to perform the trip test and not remaining in hot shutdown is a violation of a Limiting Condition for Operation, Specification 3, Table 3.5-2, Item No. 4.

This is a Severity Level IV violation (Supplement 1).

WPSC Response

The Level IV violation discussed in Inspection Report 50-305/85-016 (DRP) was identified as a noncompliance by the KNPP Operations staff on November 26, 1985 during a review of the results from the "Source Range Test at Shutdown" surveillance procedure (SP 48-008) completed during the reactor startup on November 14, 1986. During this review it was noted that the values recorded for the "High Flux Trip" were the same as those previously recorded for the "High Flux

at Shutdown Alarm." Further investigation revealed that if the "High Flux Trip" was as recorded from November 14, 1985, the reactor would have tripped on high flux prior to reaching the P-6 permissive which allows the source range high flux trip to be blocked. Since a reactor trip did not occur while ascending through the source range on November 14, 1985, it is assumed that the "High Flux at Shutdown Alarm" setpoints were inadvertently recorded as the source range "High Flux Trip" setpoints.

As noted in the Notice of Violation the Kewaunee Nuclear Plant returned to power operation on November 14, 1985 without properly testing the source range high flux trip; a violation of KNPP Technical Specifications, Limiting Condition for Operation, Specification 3, Table 3.5-2, Item No. 4.

The source range high flux trip setpoints were tested, and demonstrated operable, per SP 48-008, during a subsequent reactor startup on December 12, 1985; thus placing the Kewaunee Nuclear Plant in full compliance.

Upon identification of this event an incident report was initiated, the KNPP Senior Resident Inspector was informed, reporting requirements were evaluated, and corrective actions were contemplated. The event was determined reportable under 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by plant technical specifications. Accordingly, WPSC prepared and issued Licensee Event Report (LER) 85-021, "Source Range Channel Surveillance Error," dated December 26, 1985.

Immediate corrective actions included discussions with the operator trainee who performed the surveillance, and the cognizant operations crew. These discussions reinforced the importance of procedural adherence and the responsibility that qualified operators (i.e., EO, AO, RO, and SRO) have when trainees are assigned to their shift. To assure the entire Operations staff was aware of

WPSC's policy on trainee vs. qualified operator responsibilities for procedure performance and procedure sign-offs, the Assistant Manager-Plant Operations issued a clarification on WPSC's existing policy regarding this matter.

Paraphrasing this clarification:

- All sign-offs (including independent verification) shall be made by qualified operators.
- Trainees may make log or procedure entries, and countersign if desired.
- The assigned qualified operator is responsible for all activities performed by the trainee.

Further evaluation of this event indicated a possible procedure inadequacy.

The surveillance procedure for "Source Range Test at Shutdown" identifies the acceptance criterion for the "High Flux Trip" setting as  $\leq 10^5$  cps. The absence of a lower bound, greater than the "High Flux at Shutdown" value, may have contributed to the event.

Long-term corrective action includes revision of Administrative Control Directive (ACD) 4.5 "Shift Operation and Turnover" to reflect the above mentioned policy clarification on trainees' and qualified operators' responsibilities. This revision has been made and ACD 4.5 is presently under technical review, and will be approved by March 10, 1986. Also, SP 48-008, "Source Range Test at Shutdown," has been revised to include a lower bound on the acceptance criterion for the source range high flux trip. These corrective actions have prevented reoccurrence of similar events, and are expected to do so in the future.