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SUBJECT: Forwards 870603 response to notice of violation from environ qualification Insp Rept 50-305/87-06. Each time transmitter cover removed, o-ring is replaced.

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WISCONSIN PUBLIC SERVICE CORPORATION
600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

June 3, 1987

10 CFR 2.201

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Environmental Qualification Inspection Report 50-305/87006 (DRS)

Reference: 1) Letter from J. J. Harrison (NRC) to D. C. Hintz (WPSC) dated April 22, 1987.

Reference 1 transmitted the results of the on-site inspection of the Kewaunee Nuclear Power Plant's Environmental Qualification (EQ) Program. Two violations were identified in the inspection report. In accordance with 10 CFR 2.201, this letter provides Wisconsin Public Service Corporations' (WPSC) formal response and the attachment to this letter describes the following for each violation:

1) corrective action taken and the results achieved,

2) corrective action to be taken to avoid further violations, and

3) date when full compliance will be achieved.

As discussed in a May 11, 1987 telecon between Mr. D. J. Molzahn of WPSC and Mr. J. J. Harrison of NRC Region III, this response is being submitted within thirty days of the receipt of the notice of violation rather than the date of the notice of violation.

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Q PDR

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If you have any questions concerning this letter, please feel free to contact my staff.

Sincerely,

D. C. Hintz
Vice President - Nuclear Power

KAH/cmg

Attach.

cc - Mr. Robert Nelson, US NRC
US NRC, Region III

Attachment

To

Letter from D. C. Hintz (WPSC) to NRC Document Control Desk

Dated

June 3, 1987

Response to Notice of Violation From Environmental Qualification Inspection

Violation 1: 10 CFR 50.49, Paragraph (f) requires equipment important to safety to be qualified by testing and analysis.

Contrary to the above, the following maintenance activities specified in the licensee's qualification files as necessary to maintain the environmental qualification (EQ) of the equipment were not performed on Foxboro transmitters and Reliance Motors:

a. EQ files require lubrication of "O" rings and threads on Foxboro transmitter housings prior to their reassembly. The inspector found no evidence of a requirement for this activity in the licensee's maintenance program, nor evidence of this activity being performed in the field.

b. EQ files require annual lubrication of the anti-friction bearings of Reliance motors. The inspectors observed that there was no evidence that the anti-friction bearings of the Reliance motors 1-1084 and 1-1085 had been lubricated annually.

This is a Severity Level IV violation (Supplement 1D) (50-305/87006-02(DRS)).

WPSC Response:

1) Corrective Action taken and the results achieved:

An investigation was immediately initiated when the above discrepancies were discovered. In the case of the Foxboro transmitters, each time the transmitter cover is removed, the o-ring is replaced. At the KNPP, it is a standard practice to lubricate a new o-ring prior to placing it on the transmitter. However, this standard lubrication practice was not documented in any procedure. To resolve this concern, the EQ-3 forms that are used to document EQ maintenance requirements were immediately revised for Foxboro transmitters to specifically identify the lubrication of the o-ring. Concerning the lubrication of the transmitter housing threads, it is standard practice to not remove the existing lubrication from the threads. Verification of the adequacy of the existing thread lubrication was also

not documented in any procedure. To resolve this concern, the EQ-3 forms were immediately revised for Foxboro transmitters to specifically identify the lubrication of the threads prior to replacing the o-ring.

In the case of the Reliance motors, it was determined that the motor bearings had not been lubricated since the installation of the motors in April, 1984. An investigation revealed that two associated motors for area cooling fans installed at the same time had also not been lubricated. A work request was issued to inspect the motor bearings for damage and lubricate all four motors. The inspections found that the bearings and existing lubrication for all four motors were in excellent condition. Since the task of lubricating these bearings on an annual basis is indicated on a EQ-3 form and has been entered into the Kewaunee Nuclear Power Plant's (KNPP) Planning and Scheduling Program, future lubrications are also ensured.

2) Corrective action to be taken to avoid further violations:
Concerning the Foxboro transmitters, the appropriate documentation will be revised to specifically require the lubrication of the o-ring and the threads whenever the transmitter's cover is removed. This documentation will include the appropriate plant procedures and the Foxboro Environmental Qualification Evaluation and Review (EQER) Report. (The EQ-3 forms have already been revised.) The purpose of this documentation is to ensure that in the future the lubrication of the transmitter's o-ring and threads will be properly documented.

Concerning the Reliance motors, the program currently in place will ensure that future lubrications take place on schedule. This program involves the applicable EQERs, EQ-3 forms, and the KNPP Planning and Scheduling Program. However, to ensure that similar discrepancies do not exist, a review of the EQ-3 forms and the current Planning and Scheduling Program will be performed to ensure that no other identified EQ maintenance requirements are overdue. If any discrepancies are discovered, their effect on qualification or operability will be appropriately reviewed following plant directives. This review is currently expected to be completed by August 31, 1987. Following the completion of this review, the existing program will ensure that EQ maintenance will be performed as required.

3) The date when full compliance will be achieved:

Prior to the next scheduled calibration of the EQ Foxboro transmitters, the appropriate procedures will be revised to formally document lubrication of the transmitter's o-rings and threads. Compliance will be achieved following the issuance of the revised procedures.

For the Reliance motors, the motor bearings were inspected and lubricated during the 1987 refueling outage. While compliance has been achieved for the specific violation identified for the Reliance motors, an additional review will be performed by WPSC to ensure similar discrepancies do not exist. This review is currently scheduled for completion by August 31, 1987.

Violation 2: 10 CFR 50.49, Paragraph (j), states that a record of qualification, including documentation, must be maintained in an auditable form for the entire period during which the covered item is installed in the plant to permit verification that the equipment is qualified for its application and meets its performance requirements during an accident.

Contrary to the above, the following environmental qualification (EQ) files did not permit verification of the following parameters:

a. During review of Barton Transmitter File EQER 25.1, Gems Sensor Level Transmitter File EQER 21.1, Tavis Transmitter File EQER 44.1, and Rosemount Transmitter File EQER 39.1, the inspectors observed that the files did not address the adequacy of the demonstrated accuracy of these instruments during an accident.

b. During review of the EQ files on various cables, splices, and tapes, the inspectors observed that none of these files addressed the performance acceptance criteria, such as the adequacy of the stated insulation resistance values, relative to the performance requirements of these items during an accident.

c. During review of EQ files on motors outside the containment, the inspectors observed that the files did not address the performance acceptance criteria for the performance of these motors in an accident environment.

This is a Severity Level IV violation (Supplement 1D). (50-305/87006-04(DRS))

WPSC Response:

1) Corrective action taken and the results achieved:

During the audit, information was presented to the NRC inspectors justifying the demonstrated accuracy, including insulation resistance, of the equipment mentioned above. In the case of the transmitters and their instrument loops (which includes cables and splices and/or tapes), the Emergency Response Guidelines developed by the Westinghouse Owner's Group had identified the loops required post-accident. Plant-specific calculations were

performed that verified the adequacy of the post-accident accuracy of the identified instrument loops.

Concerning the cable, splices, and tapes used in control or power circuits, a worst-case calculation was performed that again justified the adequacy of the equipment. For motors, information was presented justifying the operability of the equipment.

In conclusion, in each case, information was presented which showed the adequacy of the equipment in the appropriate post-accident environment.

2) Corrective action to be taken to avoid further violations:

In order to document in an auditable form the investigations discussed above (e.g., post-accident loop accuracy), WPSC will upgrade the appropriate EQ files. This will include revisions to transmitter, cable, splice, tape and motor EQERs. In order to ensure that other similar discrepancies do not exist, other EQERs will be reviewed to verify that equipment accuracy and performance requirements are considered where appropriate. Since this project involves a large number of EQERs, it is anticipated this project will not be completed until September 30, 1987.

3) The date when full compliance will be achieved:

When the appropriate EQERs have been revised to reference accuracy calculations maintained on-file, then an auditable form of the performance requirements will exist. It is anticipated that this process will be completed by September 30, 1987.