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SUBJECT: Responds to NRC 890629 ltr re violations noted in Insp Rept
 50-305/89-08.

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July 31, 1989

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Inspection Report 50-305/89008 (DRP)

Reference 1) Letter from R.C. Knop (NRC) to C.R. Steinhardt (WPSC) dated
June 29, 1989.

The attachment to this letter provides our thirty-day written response to the
Notice of Violation identified in Reference 1.

Sincerely,

C. R. Steinhardt
Assistant Vice President - Nuclear Power

DSN/mjm

Attach.

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

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PDR ADDCK 05000305
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Attachment 1

To

Letter from C. R. Steinhardt (WPSC) to Document Control Desk

Dated

July 31, 1989

Attachment to July 31, 1989 Letter

From C.R. Steinhardt (WPSC) to Document Control Desk (NRC)

Notice of Violation

10 CFR 5D, Appendix B, Criterion V, states, in part,

"Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Kewaunee Nuclear Power Plant (KNPP) Engineering Control Procedure (ECP) No. 4.4., Rev. 1, "Guide to Safety Evaluations and Second Level Reviews" requires that a safety evaluation be performed for all Design Change Requests (DCRs), and if the evaluation determines that implementation of the DCR will result in a change in the facility as described in the USAR, a written evaluation should discuss the change and show that the change does not conflict with the design bases stated in the Updated Safety Analysis Report (USAR). ECP 4.4 also requires that DCR changes to Technical Specification surveillance requirements be considered in the safety evaluation.

Contrary to the above, the written safety evaluation for DCR 1824, Rev. 1, resulted in a change in the facility as described in the USAR, did not discuss the change and show that the change did not conflict with the design basis as stated in the USAR. The safety evaluation also did not consider that the DCR involved a revision to the technical specification surveillance requirements of the Kewaunee inservice test program, revision G, dated January 29, 1989.

This is a Severity Level IV violation.

WPSC Response

Wisconsin Public Service Corporation (WPSC) acknowledges the fact that a written evaluation justifying the conflict with the USAR design basis and the necessary revision to the inservice testing (IST) program was not provided as part of the Design Change Request (DCR) Safety Evaluation Report (SER).

WPSC believes that the removal of the automatic closure feature for IA-101 (control valve for instrument air to containment) following a safety injection is of minor or no safety significance. The safety evaluation for the DCR evaluated the effects of the modification and the change was technically justified. However, documentation addressing the necessary changes to the USAR design basis and the IST plan were not sufficient. WPSC performed a review of the Engineering Control Procedure (ECP) 4.4 to determine if the procedure adequately

addressed the documentation requirements for a safety evaluation and associated second level review. The review concluded that the ECP was adequate, however additional training for the design change personnel stressing the need to document their evaluations is necessary.

WPSC has been a contributor to the development of the recently released NSAC document (NSAC-125) which provides guidelines on performing 10 CFR 50.59 evaluations. Training on the NSAC document and 10 CFR 50.59 in general is currently scheduled to be provided to appropriate WPSC personnel by December 31, 1989. It is expected that the additional training will provide WPSC personnel with the guidance necessary to perform and document 10 CFR 50.59 evaluations consistent with the existing industry standards.

A review of the IST plan was conducted and a revision has been made to the plan to more accurately reflect the intent of the inclusion of valve IA-101. The valve in question (IA-101) was conservatively included in the IST plan because it can provide an additional, non-required means to isolate the instrument air line to containment. However, it has been determined that this valve is not within the scope of the ASME Code requirements for valve testing. As a result, testing of this valve is not required under KNPP technical specification 4.2 and therefore a technical specification surveillance requirement was not violated. In addition, in an effort to thoroughly document the current design and configuration, the USAR will be updated to reflect the implementation of this design change.

This violation was the topic at the most recent Nuclear Design Change (NDC) group meeting and the specific concerns identified were discussed. The need to provide written documentation detailing significant conclusions reached during the safety evaluation research was stressed to all the group personnel.

It is expected that the recent discussion at the NDC group meeting has increased the awareness of the engineering staff to ensure sufficient documentation exists to support the 10 CFR 50.59 evaluations and associated conclusions. In addition the training identified will provide appropriate personnel with the recent industry guidance on preparing safety evaluations and second level reviews. These actions should provide personnel with guidance to ensure that safety evaluations are sufficiently complete and adequately documented for future DCRs.