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 THOMPSON, H.L. Division of Licensing (800428-851124)

SUBJECT: Forwards addl info re DCRDR in response to NRC 851029 request. Expresses concern that NRC evaluating results of review against SRP Section 18 instead of util program plan prepared to satisfy Suppl 1 to NUREG-0737 Item I.d.1.b.

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WISCONSIN PUBLIC SERVICE CORPORATION

P.O. Box 19002, Green Bay, WI 54307-9002

Public**Service**

November 20, 1985

Mr. H. L. Thompson Jr., Director
Office of Nuclear Reactor Regulation
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
TAC #56133
Request for Additional Information Regarding the DCRDR

- References:
- 1) Letter from D. C. Hintz to H. L. Thompson dated June 28, 1985
 - 2) Letter from C. W. Giesler to D. G. Eisenhut dated April 15, 1983
 - 3) Letter from S. A. Varga to C. W. Giesler dated December 7, 1983.
 - 4) Letter from S. A. Varga to D. C. Hintz dated October 9, 1985
 - 5) Letter from D. C. Hintz to H. L. Thompson dated October 31, 1985
 - 6) Letter from S. A. Varga to C. W. Giesler dated June 22, 1984.

By letter dated June 28, 1985 (reference 1), we provided you with the Kewaunee Nuclear Power Plant Detailed Control Room Design Review (DCRDR) Summary Report. The report provided a synopsis of the activities that were performed during the DCRDR and a summary of the results. The review was performed in accordance with the "Program Plan" which was submitted to the NRC under cover of reference 2 and subsequently accepted by reference 3.

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In your letter dated October 9, 1985, (reference 4) you requested a meeting in your offices no later than November 4, 1985. The purpose of this meeting was to discuss "specific NRC concerns" identified by attachment 1 to reference 4.

During a telephone conversation on October 29, 1985, between our Mr. David W. Sauer and your Mr. Mort Fairtile, it was agreed that attachment 1 of reference 4 shall be considered a request for additional information, and a meeting would not be necessary. Attached please find our responses to your concerns presented in items one (1) through twelve (12) of attachment 1 to reference 4.

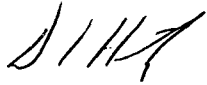
WPSC would like to take this opportunity to identify a concern with regard to the NRC evaluation of our DCRDR Summary Report.

The WPSC Program Plan was submitted under cover of a letter from Mr. C. W. Giesler to Mr. D. G. Eisenhut on April 15, 1983. The techniques and methodologies included in this Program Plan were consistent with the legal requirements and good industry practices in use at the time the Program Plan was prepared. This is substantiated by your acceptance of our Program Plan on June 22, 1983 (reference 3). Subsequent to NRC acceptance, WPSC proceeded to implement the methodologies and techniques described in the DCRDR Program Plan.

Given the aforementioned chronology, WPSC finds it disturbing that the NRC is assessing the results of the DCRDR Program for the Kewaunee Nuclear Power Plant, using criteria that were published at the conclusion of the WPSC review effort. We are of course referring to section 18 of the Standard Review Plan, published in September of 1984, and cited frequently in reference 4.

It is our understanding, that we were to prepare a Program Plan which, when implemented, would satisfy the requirements of Item I.D.1.b of NUREG 0737, Supplement 1. It is also our understanding that NRC acceptance of the Program Plan (submitted under cover of reference 1), was NRC concurrence that implementation of the accepted Program Plan satisfies those requirements. We therefore, find it inappropriate that the results of our review effort are being evaluated against, not the submitted and accepted plan, but rather, against criteria published (in final form) at the time our review phase was being concluded.

Sincerely,



D. C. Hintz
Manager - Nuclear Power

SAG/jks

Attach.

cc - Mr. S. A. Varga, US NRC
Mr. Robert Nelson, US NRC

NRC Item Number 1

Describe the process used to ensure that the selected control room improvements provide the necessary corrections and do not introduce new human engineering discrepancies into the control room (see Item 7, page 18.1-A8 of NUREG-0800).

WPSC Response

The process used to ensure that the selected control room improvements provide the necessary corrections and do not introduce new human engineering discrepancies into the control room is outlined in section 5.5 of the Kewaunee Nuclear Power Plant DCRDR Program Plan, submitted as an attachment to reference 2.

Final definition of this process was provided in Section 7.0 of the Kewaunee Nuclear Power Plant DCRDR Executive Summary submitted under cover of reference 1. An outline of the specific methodologies necessary for implementation of this process is included in reference 5. As noted in Section 5.4 of the Program Plan "Verification and Validation of the final results of design efforts initiated after the completion of the DCRDR will be conducted, but are outside the scope of the DCRDR."

NRC Item Number 2

"No information was provided with regard to the DCRDR process in relation to the Remote Shut Down Panel (Ref: "Also included in the scope of this review is the Dedicated Shutdown Panel," page 1-2 of the Summary Report). The licensee should provide applicable documentation regarding the review process, results, resolutions, and schedules for implementation (see NUREG-0800, Section 18.2 Control Room Review Responsibilities, Areas of Review)."

WPSC Response

All information with regard to the DCRDR process as it applies to the Dedicated Shutdown Panel has been provided. Those processes applicable to the Dedicated Shutdown Panel are specifically identified in the discussion of those processes in the DCRDR Program Plan. An exception to this is Section 4.0 "Control Room Survey" which was, nevertheless, used to evaluate the Dedicated Shutdown Panel.

The results, resolutions and schedules for implementation were provided by the Executive Summary. As an example, HEOs 6.3.016 and 6.3.017 are a result of the Control Room Survey as it applied to the Dedicated Shutdown Panel, and are identified as such on the individual HEO assessments included as Appendix A of the Executive Summary. These HEOs may also be found on Table 6-2, Page 3.

NRC Item Number 3 Paragraph 1

"Many of the HEOs identified have suggested corrective actions to be implemented based upon concurrence of both AIT and Management, however, no HED identification number and, in many cases, no schedule for implementation was provided, e.g., the computer system HEOs. (See Table 6-2 of the Summary Report.) Provide documentation of the proposed schedule for implementing the modifications described as per Item 4 (4) on page 18.1-A22, of NUREG-0800."

WPSC Response

All HEOs identified by the review team have suggested corrective actions. All HEOs did not necessarily receive the concurrence of both the Assessment and Implementation Team (AIT) and Management. Some observations were determined to be invalid. Consequently, no HED number was assigned, hence, a schedule for implementation was not necessary.

It should be noted that even when an HEO received the concurrence of the AIT and Management, neither group was obligated to implement the "Suggested Corrective Action" provided by the review team. It was felt that by having the review team provide a suggested corrective action the AIT would have a better understanding of the observation. The suggested corrective action should only be considered as an aid to the AIT.

NRC Item Number 3, Paragraph 2

"Many HEOs were not categorized, e.g., 6.2.003. How will implementation schedules be determined if the potential significance of human error is not assessed as part of the HEO documentation and subsequently not available for management review (see NUREG-0800, Section 18.1-A16, 2.5(1))."

WPSC Response

Those HEOs that were not categorized were those observations determined to be invalid by the AIT and Management. Therefore assessing the potential significance of a human error, resulting from a condition that does not exist at the Kewaunee Plant, would have been an unnecessary drain on personnel resources.

To specifically address HEO 6.2.003, members of the AIT had recent experiences using this system while performing 10 CFR 50, Appendix R modifications. Sound quality was adequate with four station operation. This observation was the result of an equipment malfunction.

NRC Item Number 4

"Was the Low Temperature Overpressure Protection (LTOP) alarm evaluated for human engineering discrepancies during the DCRDR as indicated in the December 16, 1983 letter from Wisconsin Public Service Corporation to NRC? (See NUREG-0800, Section 2.8(3) Coordination of Control Room Improvements With Other Programs, page 18.1-A21.)"

WPSC Response

The LTOP alarm was evaluated as we indicated in our December 16, 1983 letter (see HED 6.3.024.15).

NRC Item Number 5 Paragraph 2

Describe changes made from the Program Plan report that were not described in the Summary Report. (See NUREG-0800, Section 18.1-A22 Item 4(1).)

WPSC Response

On April 15, 1983, the WPSC submitted a DCRDR Program Plan which not only addressed all NUREG 0700 items, but which proposed additional review activities as well. WPSC submitted a comprehensive plan to the NRC under cover of reference 2. The NRC concurred by means of reference 3. As a result of the NRC In-Progress Audit (reference 6), some changes were made in the implementation techniques employed by the review team. However, no changes were made in the Program Plan that were not described in the Summary Report.

NRC Item Number 6

"The descriptions of the proposed corrective actions for Foxboro controllers (HEOs 6.4.005, 6.4.008, and 6.5.002) are not described in enough detail to evaluate adequacy. The licensee should provide a more detailed description of the proposed Foxboro controller modifications with an explanation of how the HEDs will be resolved, also a proposed schedule for implementing the modifications (See NUREG-0800, Section 18.1-A22, Item 4(3) and 4(4).)"

WPSC Response

The submitted Program Plan provides the basic framework for conducting a thorough review of the adequacy of the existing control room design. Where the existing design is determined to be inadequate, the design review team must provide recommendations for correcting those inadequacies. As indicated on pages 5-17 and 5-18 of the Program Plan (reference 2) "Design Corrections, by definition, are corrections which are developed through planned design efforts, and are beyond the scope of the DCRDR. The review team's responsibilities will, therefore, be limited to producing preliminary conceptual design recommendations. The specificity of a recommendation will vary with the type and extent of the HED." Additional details of the design process implemented at the conclusion of the DCRDR may be found in reference 5.

NRC Item Number 7 Paragraph 1

"Summary Report did not provide sufficient detail to adequately assess HED 6.6.019 (1-23). The licensee should provide a more detailed description of the proposed control room modification as part of the "overall labeling activity" with an explanation of how the HEDs were resolved, and a proposed schedule for implementing the modifications (see NUREG-0800, Section 18.1-A22, 4(2) and 4(4))."

WPSC Response

As described in our response to NRC Item Number 6 (above), it is not the intent of WPSC to provide detailed design specifications without the necessary engineering evaluation required to support the design. The labeling activity will be performed under the DCR program as outlined by reference 5.

NRC Item Number 7 Paragraph 2

"Provide documentation that the cumulative effects have been evaluated for these 23 HEDs (Reference Summary Report, Item 5.2 Assessment for Cumulative Effects on page 5.3)."

WPSC Response

HED 6.6.019 represents the evaluation of the cumulative effects, for the 23 HEOs related to control room labeling. Under "CL ITEM" on the HEO assessment form for this HED, the usual criteria reference has been replaced with the phrase "Cumulative Effects." This substitution was also made in table 6-2 of the Summary Report.

NRC Item Number 8

"The Summary Report did not provide an adequate description of the proposed annunciator system modifications proposed in HED 6.3.024 (1-23). The licensee should provide a more detailed description of the proposed annunciator system modifications with an explanation of how the HEDs were resolved, and a proposed schedule for implementing the modifications (see NUREG-0800, Section 18.1-A22, 4(2) and 4(4))."

WPSC Response

Please see the WPSC response to Item Numbers 6 and 7 above.

NRC Item Number 9

"The AIT review team comments (HEO 6.1.009) stated that "any problems with these controls will be identified during the SRTA." Did the licensee address the issue of stand-up console dimensions during SRTA, and what were the results and recommendations."

WPSC Response

Numerous HEOs identified by checklist 6.8 (Panel Layout), address the lateral spread of instrumentation (i.e. 6.8.017, 6.8.019, 6.8.020 and 6.8.021). The results and recommendations are included therein.

NRC Item Number 10

"Management review of HEO 6.2.001 suggests that the communications review of the control room PBX was not thoroughly tested. The licensee should provide a more detailed description and reevaluation of the PBX system requirements for voice communications to justify the adequacy of the existing PBX system to accommodate emergency messages."

WPSC Response

This was reviewed during the "Human Factors Review of the Emergency Response Facilities." Security now screens all incoming calls. This item has been closed (see "Executive Summary" table 6-2 page 2).

NRC Item Number 11

"A description of the proposed solution for HEO 6.2.003 is not adequate to assess how maintenance would improve the sound quality of the sound powered telephone system (see NUREG-0800, Section 18.1-A22, 4(3))."

WPSC Response

It is reasonably expected that repair or replacement of worn or defective equipment, will improve the sound quality of the sound powered telephone system (also see the WPSC response to NRC Item 3 Paragraph 2).

NRC Item Number 12

Operators do not consider HEOs related to Panel Layout, Control/Display Integration to be a problem (Reference to SRTA Verification HEOs 008, and 009). The concern here is that experienced operators have learned to live with existing poor design, and make judgments accordingly. The AIT assessment should be based on "the relative degree of degradation and the effect on plant safety."

The licensee should describe in more detail how the AIT assessed the safety significance of the above human engineering HEOs (see NUREG-0800, Section 18.1-A16, 2.5(1-4), and Section 18.1-A22, 4(3)).

WPSC Response

The AIT, with the assistance of ROs, newly licensed SROs and experienced SROs reviewed the procedural steps associated with these HEOs. It was determined that the referenced equipment was optimally located when all operating sequences were considered. The referenced displays are not used simultaneously with the referenced controls, but rather, are verified prior to control manipulation.

It should also be noted that these step sequences involve normal operating procedures where time is not a constraint.

The safety significance of these HEOs was assessed as outlined by section 5.3 of the DCRDR Program Plan submitted under cover of reference 2.