



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

WISCONSIN PUBLIC SERVICE CORPORATION  
WISCONSIN POWER AND LIGHT COMPANY  
MADISON GAS AND ELECTRIC COMPANY  
KEWAUNEE NUCLEAR POWER PLANT  
DOCKET NO. 50-305

GENERIC LETTER 83-28, ITEM 2.2 (PART 2)  
VENDOR INTERFACE  
(PROGRAMS FOR ALL SAFETY-RELATED COMPONENTS)

1.0 INTRODUCTION AND SUMMARY

Generic Letter 83-28 was issued by the NRC on July 8, 1983, indicating actions to be taken by applicants and licensees based on the generic implications of the Salem ATWS events. Item 2.2 (part 2) states a staff position which requires licensees and applicants to establish, implement and maintain a continuing program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of the plant, and appropriately referenced or incorporated in plant instructions and procedures.

The licensee for the Kewaunee Nuclear Power Plant submitted responses to Item 2.2 (part 2) of Generic Letter 83-28 by letters dated December 2, 1983, April 13, September 21, and November 15, 1984 and March 14, 1985. The staff's evaluation of these responses finds them to be acceptable with the exceptions noted.

2.0 EVALUATION AND CONCLUSIONS

The licensee's program has been evaluated for three sub-items: (1) for equipment where vendor interfaces can be established, (2) for equipment where vendor interface cannot be practicably established, and (3) division of responsibilities between the licensee and vendor for servicing safety-related equipment.

The NRC staff has developed guidelines for evaluating the licensee's responses for each sub-item.

1. Program Where Vendor Interface Can Be Established

Guideline - The licensee or applicant response should describe their program for establishing and maintaining interfaces with vendors of safety-related components which ensures that vendors are contacted on a periodic basis and that receipt of vendor equipment technical information (ETI) is acknowledged or otherwise verified.

8712310267 871218  
PDR ADDCK 05000305  
P PDR

This program description should establish that formal interfaces are established with the Nuclear Steam Supply System (NSSS) vendor, as well as with their diesel generator vendor and the major vendor of their safety-related electrical switchgear. In addition, the licensee should confirm that a program of periodic informal contact with the vendors of their other key safety-related equipment such as auxiliary feedwater pumps, emergency core cooling system pumps, batteries, battery chargers, inverters, and valve operators has been established to facilitate the exchange of current technical information. The description should verify that procedures exist for controlling the handling of this vendor technical information which ensure that it is kept current and complete, and that it is incorporated into plant operating, maintenance and test procedures as is appropriate.

#### Evaluation

The licensee responded to these requirements by letters dated December 2, 1983, April 13, and November 15, 1984, and March 15, 1985. These submittals included information that describes the licensee's vendor interface programs. In the review of the response to this item, it was assumed that the information and documentation supporting this program is available for audit upon request.

The licensee stated that it has a program of interface with its NSSS vendor, Westinghouse, which supplies information in the form of letters, bulletins, operation and maintenance manuals and other documents.

The licensee states that it initiates contact with the vendors of other safety-related equipment as needed for repair and maintenance activities as was recommended in the NUTAC/VETIP report (INPO 84-010). It also states that procedures to implement the VETIP program are in place. Further, it has described procedures for handling this information which ensures that it is complete and current and is incorporated into plant operating, maintenance and test procedures.

The licensee has not described formal interfaces with its diesel generator vendor or with the major vendor of its safety-related electrical switchgear as requested by the guidance for Generic Letter 83-28, Item 2.2.2. In addition, its response did not include a program of periodic informal contact with the vendors of its other key safety-related equipment, but only that it initiated contact with these vendors in case of need.

#### Conclusion

The staff concludes that, with the exception of interfacing with the vendors of other safety-related equipment, the licensee's response regarding the program for equipment where vendor interface can be established is acceptable. For the diesel generator and key safety-related electrical switchgear vendors, the licensee should establish formal interfaces with these vendors similar to those established with its NSSS vendor. For the vendors of all other key safety-related equipment, the licensee should expand its program of initiating vendor contact on an as-needed basis to one of periodic informal contact with these vendors.

2. Program Where Vendor Interface Cannot Be Practicably Established

Guideline - The licensee/applicant should describe their program for compensating for the lack of a formal vendor interface where establishment of such an interface is not practicable. This program may reference the NUTAC/VETIP program, as described in INPO 84-010, issued in March 1984.

If the NUTAC/VETIP program is referenced, the response should describe how procedures were revised to properly control and implement this program and to incorporate the program enhancements described in Section 3.2 of the NUTAC/VETIP report. The use of the NUTAC/VETIP program, instead of either a formal interface with each vendor of safety-related equipment or a program to periodically contact each such vendor, will not relieve the licensee/applicant of its responsibility to obtain appropriate vendor instruction and information where necessary to provide adequate confidence that a structure, system or component will perform satisfactorily in service and to ensure adequate quality assurance in accordance with Appendix B to 10 CFR Part 50.

Evaluation

The licensee provided in its submittal a brief description of its vendor interface program which references the NUTAC/VETIP program and it states that plant instructions and procedures are currently in place which assure that the VETIP program is properly controlled and implemented.

VETIP is comprised of two basic elements related to vendor equipment problems - the Nuclear Plant Reliability Data System (NPRDS) and the Significant Event Evaluation and Information Network (SEE-IN) programs. VETIP is designed to ensure that vendor equipment problems are recognized and evaluated and corrective action taken.

Through participation in the NPRDS program, the licensee submits engineering information, failure reports and operating history for review under the SEE-IN program. Through the SEE-IN program, the Institute of Nuclear Power Operations (INPO) reviews nuclear plant events that have been reported through the NPRDS programs, Nuclear Network and NRC reports. Based on the significance of the event, as determined by the screening review, INPO issues a report to all utilities outlining the cause of the event and related problems and recommends practical corrective actions. These reports are issued as Significant Event Reports, Significant Operating Experience Reports and as Operations and Maintenance Reminders. Upon receipt of these documents, the licensee evaluates the information to determine applicability to Kewaunee. This evaluation is documented and corrective actions are taken as determined necessary.

The licensee's response states that procedures exist to review and evaluate incoming equipment technical information and to incorporate it into existing procedures.

### Conclusion

The staff finds that the licensee's response to this concern is adequate and acceptable, with the understanding that the licensee's commitment to implement the VETIP program includes the implementation of the enhancements described in Section 3.2 of the NUTAC/VETIP program to the extent that the licensee can control or influence the implementation of these recommendations.

### 3. Division of Responsibilities Between the Licensee and Vendor For Servicing Safety-Related Equipment

Guideline - The licensee/applicant's response should verify that the responsibilities of the licensee or applicant and vendors that provide service on safety-related equipment are defined such that control of applicable instructions for maintenance work on safety-related equipment is provided by the licensee/applicant.

### Evaluation

The licensee committed to implement the NUTAC/VETIP program and stated that this program contains implementation procedures for the internal handling of vendor services. It further confirms that procedures are in place to implement this program.

### Conclusion

The staff finds the licensee's commitment to implement the VETIP program to be acceptable, with the understanding that the licensee's commitment includes the objective for "Internal Handling of Vendor Services" described on page 23 of the March 1984 NUTAC Report.

### 3.0 SUMMARY CONCLUSION

The staff's review of the licensee's responses to Item 2.2 (Part 2) of Generic Letter 83-28 for the Kewaunee Nuclear Power Plant finds that the licensee's interface program with its NSSS vendor, plus its commitment to implement the NUTAC/VETIP program, is acceptable with the understanding that its commitment to implement the NUTAC/VETIP program includes the objective for "Internal Handling of Vendor Services", described on page 23 of the NUTAC report (INPO 84-010), and includes the enhancements described in Section 3.2 of that report to the extent that the licensee can control or influence such enhancements. Also, the licensee should establish formal interface programs, similar to those established with its NSSS vendor, with its diesel generator vendor and with the major vendor of its safety-related electrical switchgear. In addition, the licensee should expand its program of initiating contact with the vendors of its other key safety-related equipment from an as-needed basis to one of periodic informal contact with its vendors to ensure that the vendor information available onsite is current and complete when needed.