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HINTZ,D.C. Wisconsin Electric Power Co.
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SUBJECT: Forwads further clarification to util 871218 response to Generic Ltr 83-28,Item 2.2.

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March 4, 1988

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
TAC #53682
Generic Letter 83-28 Item 2.2 (Part 2)

References: 1) Letter to D. G. Eisenhut from D. C. Hintz dated November 15, 1984.
2) Letter to S. A. Varga from D. C. Hintz dated March 14, 1985.
3) Letter to D. C. Hintz from T. R. Quay dated December 18, 1987.

Reference 3 transmitted the NRC's Safety Evaluation for item 2.2 (Part 2), vendor interface of Generic Letter 83-28 to WPSC. From our review of this Safety Evaluation it appears that our submittals on this item (references 1 and 2) may have been misinterpreted. As a result a conference call was held with the NRC on January 13, 1988 to discuss this Safety Evaluation. NRC participants included the Kewaunee Project Manager and the Technical Reviewer for this item. The attachment to this letter provides further clarification to WPSC's response to Item 2.2 (Part 2) of Generic Letter 83-28. It is our understanding that, as a result of this submittal, the NRC will issue a supplement to the subject Safety Evaluation (reference 3). Should you require any additional information, please contact my staff.

Sincerely,

Mark L. Marchi for

D. C. Hintz
Vice President - Nuclear Power

PEM/jac
Attach.
cc - Mr. Robert Nelson, US NRC
US NRC, Region III

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Attachment

To

Letter from D. C. Hintz (WPSC)

To

Document Control Desk (NRC)

Dated

March 4, 1988

Concern No. 1

The Safety Evaluation (reference 3) makes several references to WPSC's commitment to implement the NUTAC/VETIP program.

WPSC Response

Reference 1 transmitted our initial response to the subject item and included a detailed description of KNPP's vendor interface methods. In that response we made reference to the NUTAC and stated that we supported NUTAC's approach to a Vendor Interface Program. This support was mainly attributable to the similarities between the NUTAC/VETIP program and the effective methods utilized at the Kewaunee Nuclear Power Plant (KNPP). KNPP's vendor interface methods, as described in reference 1, fully meet the intent of the NUTAC/VETIP program and therefore need not be modified or supplemented.

Concern No. 2

The vendor interface program should include a means of internal handling of vendor services similar to that described on page 23 of the NUTAC report (INPO 84-010).

WPSC Response

At KNPP there are three main documents which govern the QA/QC controls imposed on vendor services. The first of these is the Operational Quality Assurance Program (OQAP). The OQAP describes the requirements necessary to ensure compliance with 10 CFR 50 Appendix B and ANSI N18.7-1976. Section 6 of the

OQAP concerns Procurement Control, and identifies the information that shall be included in the procurement planning process to assure adequate quality. Section 12 concerns Plant Procedures and establishes the requirements and responsibilities for procedures used at KNPP. The requirements in these sections of the OQAP are consistent with the recommendations in the NUTAC report (INPO 84-010).

The second document is the Operational Quality Assurance Program Description (OQAPD). Consistent with its title, the OQAPD describes the OQAP. It is updated annually and changes are approved by the NRC.

The third document which governs the QA/QC controls imposed on vendor services is a set of directives called Quality Assurance Directives (QAD's). The QAD's implement the QA/QC requirements identified in the OQAP by requiring that all safety-related services be performed under the controls of an acceptable QA program. This requirement may be satisfied by the vendor's QA program, or by working under the auspices of WPSC's approved QA program.

These demonstrate that existing programs/methods at KNPP meet the intent of the discussion of internal handling of vendor services on page 23 of the NUTAC report (INPO 84-010).

Concern No. 3

The vendor interface program should include the enhancements identified in Section 3.2 of the NUTAC report (INPO 84-010) to the extent that WPSC can control or influence those enhancements.

WPSC Response

WPSC has an Administrative Control Directive (ACD) in place which provides guidance for NPRDS reports at KNPP. ACD 2.18 has been reviewed against Section 3.2 of the NUTAC Report and no deficiencies were identified. We would be receptive to evaluating any enhancements that INPO might recommend for incorporation into KNPP's implementation of the NPRDS and SEE-IN programs.

Concern No. 4

WPSC should establish formal interface programs, similar to those established with Westinghouse, with the diesel generator vendor and with the vendor of the safety-related electrical switchgear.

WPSC Response

To date the diesel generator vendor interface at KNPP consists of annual on-site consultation with a service representative. During refueling outages a service representative is brought on-site to assist in the performance of test and maintenance activities on the 1A and 1B diesel generators. At that time information is exchanged and KNPP maintenance procedures are reviewed and updated, as applicable. This is more effective than a periodic phone conversation or letter exchange in that on-site consultations with a service representative afford the opportunity for "hands on" questions and answers. It is also more conducive to a direct exchange of ideas and information which should result in the best and most current maintenance methods/practices being incorporated into KNPP's maintenance procedures.

This type of exchange is not available with KNPP's 4160V electrical switchgear vendor. This switchgear was supplied by McGraw-Edison. It is our understanding KNPP is the only nuclear power plant with McGraw-Edison switchgear. McGraw-Edison has since sold out to another company from which we have obtained minimal support. However, we have had very good success with the McGraw-Edison switchgear. We feel this is directly attributable to the effective Preventive Maintenance Program employed at KNPP. Every refueling outage the switchgear is cleaned and inspected, and general maintenance is performed. Although an interface program is not possible for this switchgear, appropriate measures are taken to ensure the continued reliable performance of this equipment.

Concern No. 5

WPSC should expand its program of initiating contact with vendors of other key safety-related equipment from an as-needed basis to one of periodic informal contact with the vendors to ensure that the vendor information available on-site is current and complete when needed.

WPSC Response

Per the conference call with NRC staff members on January 13, 1988, the safety-related equipment of interest includes ECCS equipment, motor operated valves, batteries, and battery chargers.

ECCS equipment manufactured by Westinghouse is included in our established formal vendor interface program with them.

Motor operated valves were supplied by Limitorque. Maintenance personnel have established informal contacts at Limitorque. This has facilitated a free flow of information which has proven adequate in ensuring that Limitorque information on-site is current and complete.

The safety-related batteries and battery chargers at KNPP were supplied by C & D Batteries. This equipment is relatively simple in nature and does not pose complicated maintenance problems or concerns. However, the important function of these components is recognized by WPSC. Thorough maintenance procedures are in place which verify performance and check for abnormalities that may indicate degradation or malfunction. Because of the simple nature of these components, their performance record, and the extensive maintenance program at KNPP for the batteries and battery chargers, there is no need for scheduled contact with C & D batteries. Vendor interface as needed on these components has proven very effective and adequate.

The philosophy at KNPP is to call in vendor support whenever the task or problem at hand exceeds the expertise of the maintenance staff. This is true of both safety-related and non-safety-related equipment and exemplifies our commitment to preventive maintenance.

Summary

The objective of Generic Letter 83-28, Section 2.2.2 is to improve the reliability of safety-related components. This can only be accomplished through the implementation of a thorough preventive maintenance program, supplemented with vendor interface, as applicable and available. In the case of Limitorque actuators

scheduled maintenance activities at KNPP include operability checks, verification of proper valve opening and closing times, and equipment qualification. Preventive maintenance performed on the safety-related batteries is also very extensive. They are cleaned and inspected monthly, and if any indications of cracking are found, C&D Battery is contacted. Also during this monthly maintenance voltage and specific gravity readings are recorded, and battery posts and connections are lubricated with corrosion resistant oil, distilled water is added to each cell, and cell voltages are equalized, as needed. Battery connection tightness and cell-to-cell resistance is checked annually. Every five years the batteries are load tested to ensure that required capacities are available, as required by the KNPP Technical Specifications. The battery chargers are calibrated and adjusted annually. Vendor interfacing, when practical, enhances maintenance activities at KNPP by providing current information for components. This information is incorporated into maintenance procedures, as applicable. However, the key to component reliability is a preventive maintenance program, such as KNPP's, which takes into account plant-specific component maintenance and surveillance history.

KNPP has an extensive preventive maintenance program. Formal and informal vendor interface programs, similar to the NUTAC/VETIP program described in INPO 84-010 exist where practical. Methods are implemented which ensure that proper QA/QC controls are placed on vendor services. These comprise a vendor interface program which meets the intent of Generic Letter 83-28 Item 2.2 (Part 2) and the NUTAC/VETIP program (INPO 84-010) by ensuring safety-related component reliability.