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 SCHROCK, C.A. Wisconsin Public Service Corp.
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 Document Control Branch (Document Control Desk)

SUBJECT: Provides response to violations noted in NRC Exam Rept
 50-305/OL-93-01 administered during wk of 930222. Corrective
 actions: nearest area containing sufficient matl located in
 maint area.

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April 22, 1993

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
Examination Report

Reference: 1) "Examination Report" from M. A. Ring (NRC) to C. A. Schrock (WPSC) dated
March 23, 1993

Pursuant to your request in reference 1, the attachment to this letter provides our response to the items of concern identified during the NRC examinations administered during the week of February 22, 1993. Included in the response are the corrective actions which have been initiated to resolve this issue.

If further information or clarification is required, please feel free to contact me or a member of my staff.

Sincerely,

C. A. Schrock

C. A. Schrock
Manager - Nuclear Engineering

DLR

Attach.

cc - US NRC, Region III
NRC Senior Resident Inspector

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Attachment

to

Letter from C.A. Schrock (WPSC) to NRC Document Control Desk

Dated

April 22, 1993

Regarding

NRC Examination Report No. 50-305/OL-93-01

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April 22, 1993
Attachment 1, Page I

NRC Concern

During the local operation of a steam generator's power operated relief, the candidates used a posted Informational Aid plaque to perform the evolution. This plaque did not conform to the requirements of Administrative Control Directive (ACD) 1.15, Section 5.7, which requires each Informational Aid to be marked with an identification number, date and signature of the authorizing supervisor.

Wpsc Response

ACD 1.15 Rev. A, step 3.1 defines informational aids as:

"Informational Aids - Information including procedures, sketches, drawings, instruction, notes, and other documents which are posted or permanently located in normally unattended locations throughout the plant for personnel assistance in performing assigned duties. Informational Aids will be identified by group association (Operator Aid, I&C Aid, etc.)

Exceptions: This does not include Permanent Information posted or kept in the plant or drawings and procedures kept in department files or controlled document binders."

Also step 3.2 defines permanent information as:

"Permanent Information - Information that is posted in a manner not easily susceptible to change, degradation, or removal (i.e., engraved or painted labels would be acceptable, "DYMOTAPE" is not acceptable). Permanent Information is not governed by this procedure.

The plaques located at the steam generator power operated relief valves are engraved (black on white) plastic labels permanently attached to metal plates which are bolted to vertical supports. We feel that these plaques meet the definition of Permanent Information as stated in ACD 1.15, step 3.2 and therefore meet the exception stated in ACD 1.15 as referenced above.

NRC Concern

During the local operation of an emergency diesel generator, the candidates were not able to obtain a copy locally of the required procedure to perform an emergency shutdown of the diesel engine. In the near proximity, the Dedicated Shutdown Panel contained a copy of the abnormal procedure, A-DGM-10, but did not contain a copy of the emergency procedure, E-DGM-10, which was required for this event. The nearest copy was obtained from the main control room (approximately five minute transient time).

The Diesel Generator Emergency Shutdown Procedure, E-DGM-10, addresses the operator actions required to shutdown the diesel engine. In the Subsequent Action's section, Step 4.3 (being the third sequential operator action) directs the operator to position a non-porous (plastic) material over the diesel engine air filters to restrict the source of combustion air. No non-porous material was found available in the near proximity of the diesel engine room. The nearest area containing sufficient material was located in the maintenance work area (approximately five minute transient time). Additionally, the height of each filter bank (three filters stacked vertically) would require the use of a ladder to complete installation, which was not found available in the near proximity of the diesel engine room. This action is contrary to the need to quickly shutdown the diesel engine and ensure personnel safety while performing the task.

WPSC Response

In response to the second NRC concern:

Procedure E-DGM-10, "Diesel Generator Emergency Shutdown", describes the actions to be taken in the event that an emergency diesel generator fails to stop using the control room switch. KNPP's philosophy in using this procedure is that it will only be used if the diesel continues to run, but at a low speeds. If a diesel is running at excessive speeds, personnel are not required to enter the diesel generator room to try and locally stop it. KNPP considers it very dangerous to place personnel in the room with the diesel running at excessive speeds. If this situation occurs, the alternate technique (step 4.4 of the procedure) will be performed to shutdown the diesel, i.e. starving the diesel of oxygen by flooding the room with CO₂. This can be done from outside the diesel generator room. If the diesel is running at low speeds, personnel can enter the room and follow steps 4.1, 4.2, and 4.3 to stop it. Time is not as critical in this condition, and therefore, it is not necessary to have all materials and equipment needed to perform these steps immediately available.

Procedure E-DGM-10 will be revised to reflect this philosophy.

In response to the first NRC concern:

Procedure A-DGM-10, "Abnormal Diesel Generator Operation" is referenced in Emergency Operating Procedure E-O-07, "Fire In Dedicated Fire Zone". The purpose of E-O-07 is to place the plant in Hot Shutdown and cooldown to Cold Shutdown using control room and local manual operations in the event of a fire at the dedicated shutdown panel or in a dedicated fire zone. It would be critical to minimize the time necessary to start a diesel during a fire in a dedicated fire zone, therefore a local copy is maintained. Procedure E-DGM-10 is not required for manual diesel operation and an emergency shutdown is not considered a time critical operation, as stated above, therefore a local copy is not maintained.

NRC Concern

All but one of the candidates used 'For Information Only' plant drawings (miniprints) exclusively to verify system lineup during various plant evolutions. Some of these documents were noted to be outdated by the candidates and NRC examiners, but were used anyway. For example, the candidates were performing a JPM requiring the dead bus transfer of power for a safeguards vital bus. In accordance with procedure, the candidates were required to open all of the feeder breakers supplied from the affected bus. The "miniprints" were referenced to verify all loads off the bus and most of the candidates acknowledged that the referenced system print did not indicate a recent modification adding a fire pump to the bus loading. Only one candidate made the effort to verify the modifications existence by referencing updated prints which were located near by. Copies of these miniprints were found located in the plant specific simulator control room and in the plant's main control room during power operations. In accordance with the definition of "current", these drawings are not maintained up to date or controlled to ensure outdated prints are replaced and not made available for the licensed operator's use.

The NRC examiners noted that ACD 4.3, Tagout Control, Step 5.9.a, requires the performance of a "Tagout Adequacy/Accuracy Verification" using current plant reference material such as flow diagrams, MCC Book and logic diagrams. Additionally, Nuclear Administrative Directive (NAD) 12.13, Maintenance Procedures, Step 5.7.2.d, and NAD 12.3, Operations Procedures, Step 5.6.3.4, required a periodic review against current flow and logic drawings.

WPSC Response

The "miniprints" used at KNPP are considered a valuable reference tool but are not to be used for safety related work. This fact is taught to all operators and it is understood that updated prints must be used for all safety related work, including the performance of the procedures referred to above. The mimiprints are helpful as a quick reference during general discussions, for answering general questions, and checking one's understanding of plant details. All operators are informed of all plant modifications and minor changes through training, required reading, and on-the-job involvement with projects. Operators rely on this knowledge to determine when drawings may be affected by recent plant changes and when it is necessary to use updated drawings.

Up-to-date drawings are available in the control room on aperture cards and on hard copies of selected drawings. Also, aperture cards are available in the simulator control room. Currently only an aperture card reader is available in the control room and simulator control room for reading these up-to-date prints. The card reader in the simulator control room does not work properly. During the performance of the JPM referred to above, the candidates noted the fact that a plant modification existed which affected the system mimiprint being used but, since they

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were aware of the poor viewing quality of the simulator card reader, they did not verify the drawing information using the up-to-date aperture card print.

Due to these problems, KNPP will install a reader/printer machine in the control room plus an operable reader in the simulator control room. A reader/printer in the control room will provide increased convenience for the operators and reduce the temptation to use the miniprints. This will promote the use of up-to-date drawings. At this time a reader/printer is not essential in the simulator control room, but an operable reader will provide positive training by becoming a useful training tool in the simulator and help to develop good work habits when used during training. A reader/printer in the control room and a usable reader in the simulator should be installed within six months. This will allow sufficient time to order and receive a new reader/printer if necessary.

Furthermore, emphasis will continue to be placed in this area during operator training in order to insure proper understanding of the requirements to use up-to-date prints for safety related work and when updated prints are required to be used.