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SUBJECT: Discusses SWS operational performance ins w/ref to insp rept
 50-305/94-03.

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November 18, 1994

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Service Water System Operational Performance Inspection (Inspection Report 94-003)

- References:
- 1) Letter to CASchrock (WPSC) from GEGrant (NRC) dated April 1, 1994 (Inspection Report 94-003)
 - 2) Letter to Document Control Desk (NRC) from CASchrock (WPSC) dated May 2, 1994

Reference 1 provided Wisconsin Public Service Corporation (WPSC) with the results of the Nuclear Regulatory Commission's (NRC's) service water system operational performance inspection (SWSOPI). Reference 2 provided you with our response to the inspection results. As discussed with the NRC Senior Resident Inspector for the Kewaunee plant on August 30, 1994, the corrective actions for the violation and deviation were not completed as scheduled.

WPSC committed to the following in response to the notice of violation of Kewaunee maintenance procedure PMP 17-2.

WPSC will implement an improved communication process for new requirements. It is anticipated that it will take approximately 6 months to develop and implement this system.

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Document Control Desk
November 18, 1994
Page 2

We will perform an assessment of our internal communication processes. The evaluation will use this event as well as other events involving poor communications to help determine the causes of these communication problems. This evaluation is tentatively scheduled to be completed in June 1994.

WPSC initiated an assessment of the communication processes at the plant. However, this was a more difficult task than anticipated. Based on our progress and initial effort, we expect to be completed with the assessment in January 1995. The results of the assessment will be used to develop an improved communication process for new requirements. The new process should be in place within 3 months of completing the assessment.

To address the deviation associated with the lack of an operable service water flow comparator alarm for the containment fan coil units, WPSC stated:

An evaluation is currently under second level review to assess the consequences of the SW leakage into containment. The results of this evaluation conclude that the SW flow mismatch alarm system can be deleted from the current plant configuration because there are other methods currently available for operators to detect SW leakage in Containment. It is anticipated that upon final review of this evaluation a DCR will be implemented to remove this alarm and update the USAR. The evaluation and second level review are expected to be completed in August 1994.

The second level review identified several items requiring additional analysis to enhance procedural guidance for beyond design basis events. This has not challenged our original conclusions on the acceptability of removing the flow mismatch alarm system. Because of the additional analyses, completion of the evaluation was delayed and is now scheduled to be finished by year end 1994.

Sincerely,

C. A. Schrock

C. A. Schrock
Manager - Nuclear Engineering

TJW/san

Attach.

cc - US NRC Region III
US NRC Senior Resident Inspector