

# CATEGORY 1

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STEINHARDT, C.R.      Wisconsin Public Service Corp.  
RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Forwards response to NRC 951221 ltr re violations noted in  
insp rept 50-305/95-12 on 951109-1213. Corrective actions:  
oil was added to TDAFP.

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March 1, 1996

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

Ladies/Gentlemen:

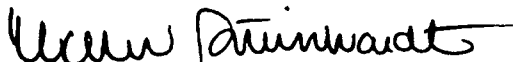
Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Reply to Notice of Violation, Inspection Report 50-305/95012

- Reference:
- 1) Letter from W. L. Axelson (NRC), to C. R. Steinhardt (WPSC) dated December 21, 1995
  - 2) Letter from H. J. Miller (NRC) to C. R. Steinhardt (WPSC) dated February 2, 1996
  - 3) Letter from M. L. Marchi (WPSC) to NRC Document Control Desk, dated December 14, 1995, (Licensee Event Report 95-007-00)

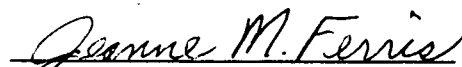
In references 1 and 2 the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of the safety inspection conducted November 9 through December 13, 1995.

During the inspection, the NRC identified a violation involving the turbine-driven auxiliary feedwater (TDAFW) pump. The TDAFW pump was identified by WPSC as being inoperable during a surveillance test on November 9, 1995. Attached is the response to the violation.

Sincerely,

  
Clark R. Steinhardt  
Senior Vice President - Nuclear Power

Subscribed and Sworn to  
Before Me This 1<sup>st</sup> Day  
of March 1996

  
Notary Public, State of Wisconsin

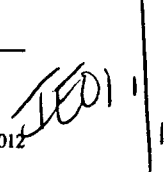
MEA  
Attach.  
cc - US NRC Region III  
US NRC Senior Resident Inspector

050053

My Commission Expires:

June 13, 1999

9603050499 960301  
PDR ADDCK 05000305  
Q PDR



ATTACHMENT 1

Letter from C. R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Dated

March 1, 1996

Re: Reply to Notice of Violation, Inspection Report 50-305/95012

### NRC Notice of Violation

Technical Specification 3.4.b.1 requires operability of both motor driven auxiliary feedwater pumps and the turbine driven auxiliary feedwater pump whenever the reactor is heated above 350 degrees F. Technical Specification 3.4.b.2 permits inoperability of one auxiliary feedwater pump for 72 hours. If operability is not restored within the time specified, then within 1 hour, action shall be initiated to achieve Hot Standby within 6 hours, achieve Hot Shutdown within the following 6 hours, and achieve and maintain the reactor coolant system less than 350 degrees F within an additional 12 hours.

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, the failure to have a work instruction for draining lube oil from the auxiliary feedwater pumps and performing a post-maintenance test on October 27, 1995, resulted in the turbine driven auxiliary feedwater pump being inoperable for thirteen days. Action was not taken within 1 hour to achieve Hot Standby within 6 hours, achieve Hot Shutdown within the following 6 hours, and achieve and maintain the reactor coolant system less than 350 degrees F within an additional 12 hours.

### WPSC Response

Wisconsin Public Service Corporation does not contest this violation.

### Reason For Violation

The detailed description of the event including causes has been previously provided in reference 3.

### Corrective Actions

To address the causes of this event as well as some weaknesses identified during the subsequent event investigation, the following actions have been or are being taken.

The corrective actions listed below have been completed. We believe these actions should ensure future violations are avoided.

- 1) In order to restore operability, oil was added to the Turbine Driven Auxiliary Feedwater Pump, and the pump was satisfactorily tested and returned to service on November 9, 1995. The motor driven auxiliary feedwater pumps A and B were also satisfactorily tested on that date to ensure they were operable.
- 2) Operations Management issued a letter conveying specific interim guidance on maintaining the proper oil level in the AFW pumps. This included instructions to operate the auxiliary lube oil pump and verify oil level is in the "Normal Operating Range". This action will ensure that indicated oil level is representative of system volume. Further guidance was also provided to the operators to aid their response to a low or high level indication.
- 3) Danger cards were placed on the AFW pump lube oil sight glasses warning personnel to use the interim operations guidance for maintaining proper oil inventory.
- 4) A review of other safety-related lubricating oil systems was performed to identify other pumps which may be susceptible to a similar failure mechanism. None were identified with the potential for creation of a void resulting in an incorrect oil indication following an oil level adjustment.
- 5) The Superintendent - Plant Operations issued a letter to the operations department re-emphasizing that a leak from certain AFW lube oil piping sections could not be detected using the reservoir sight glass. The letter underscored the importance for a questioning attitude and open communications.
- 6) The Plant Manager issued short term guidance requiring that all unplanned, non-periodic maintenance activities affecting safety-related equipment be performed using the plant work request system. Any exceptions to this practice require Plant Operations Review Committee endorsement and Plant Manager approval.
- 7) Prior to this event, a team had been formed to develop and implement a work management system for engineering work. The expected outcome is a process which will improve planning and prioritization of engineering work through improved inter-departmental communications. This newly developed process is currently being implemented with ongoing refinements.
- 8) A review was performed to determine the adequacy and appropriateness of the post-maintenance test and retest requirements specified in existing maintenance procedures. A minimum sample of twenty safety-related, planned, periodic maintenance tasks (procedures) were reviewed for each of the participating work groups (i.e., mechanical maintenance, electrical maintenance, instrument and control). This multidisciplinary review was completed on January 31, 1996.

Results of this review showed that no significant safety risks were identified; however, the adequacy of the specified post-maintenance test and/or retest could be improved in some areas. As a result of the review, a team was formed to develop a checklist to aid in the verification of the necessary post-maintenance test and retest for periodic maintenance procedures. The checklist is currently being utilized as appropriate by the plant work groups (i.e., mechanical maintenance, electrical maintenance, instrument and control).

The long term corrective actions are listed below. Completion of these actions will provide permanent resolutions to identified weaknesses and will also enhance existing processes.

- 1) The concern associated with the small lube oil level fluctuations will be resolved. This will include replacing the placard adjacent to the reservoir sight glass to permit small level fluctuations without requiring the addition or removal of oil. Initial testing has been performed to support resolution. Additional testing is planned, with final resolution of this concern expected to be completed by June 30, 1996.
- 2) Applicable plant Auxiliary Feedwater System procedures will be revised to include specific guidance on maintaining proper oil levels in the AFW pumps. Revisions will include operation of the auxiliary lube oil pump to remove any voids in the piping system following oil adjustment activities or routine oil sampling. The appropriate Operations department procedures will then replace the interim guidance outlined in completed corrective action number 2. Procedure revisions will be completed by June 30, 1996.
- 3) This event will be included as part of the continuing training requirements for the Engineering, Maintenance, and Operations departments' personnel. The training will include specific discussions of the AFW pump lube oil system design and operating characteristics. Training associated with this event is scheduled to be completed by June 30, 1996.
- 4) While operating under the interim guidance of completed corrective action number 6, further study and review of our work control practices will be conducted. The results of this evaluation will be included as a revision to the appropriate plant directives and procedures related to the work control process. Procedure revisions are expected to be in place by April 30, 1996.
- 5) A program for identifying, documenting, and prioritizing "operator work-arounds" has recently been established. The Operator Work-Around List serves as an additional management tool to ensure appropriate prioritization and timely resolution of repetitive problems. The lessons learned from this event will be factored into the program by April 30, 1996.

- 6) The entire plant staff will receive continuing training on the need for a questioning attitude. This training is expected to include topics such as self-checking, cognitive thinking, and conservative decision making. This training is scheduled to be completed by June 30, 1996.
- 7) A process improvement team is currently reviewing various aspects of the work request process. A significant portion of this effort will focus on specification and implementation of post-maintenance test and retest requirements. This group expects to have improvements identified and implemented by September 1, 1996.

#### Compliance Schedule

WPSC believes the actions outlined above will effectively address the specific causes of this event, as well as the process weaknesses identified during the event investigation. As described above, a number of the corrective actions have already been completed. The long term corrective actions will be completed in accordance with the dates provided for the individual corrective action. The date for final completion of all of the corrective actions is bounded by the latest date listed, which is September 1, 1996.