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 STEINHARDT,C.R. Wisconsin Public Service Corp.
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to NRC 960605 ltr re violations noted in
 insp rept 50-305/96-04 on 960326-0513.C/A:plant staff
 initiated Incident Rept & work request & established hourly
 fir watch.

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WISCONSIN PUBLIC SERVICE CORPORATION

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July 5, 1996

10 CFR 2.201

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 96-004

Reference: Letter from M. J. Farber (NRC) to M. L. Marchi (WPSC) dated June 5, 1996
(NRC Integrated Inspection Report 50-305/96004 and Notice of Violation).

In the above reference, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of the routine safety inspection conducted March 26 through May 13, 1996.

During the inspection, NRC identified one Severity Level IV violation. The violation was cited due to the fire protection monitoring program failing to implement appropriate corrective measures to address a degraded fire penetration. This was contradictory to the procedures which implement the program.

Attached is our response to the notice. If you should have any questions with regard to this response, please contact me or a member of my staff for clarification.

Sincerely,

C. R. Steinhardt
for *C. R. Steinhardt*

C. R. Steinhardt
Senior Vice President-Nuclear Power

GIH
Attach.

cc: US NRC Senior Resident Inspector
US NRC Region III

Subscribed and sworn to
Before Me This 5th Day
of July 1996

Donna M. Sheedy
Notary Public, State of Wisconsin

My Commission Expires:
February 7, 1999

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PDR ADDCK 05000305
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ATTACHMENT 1

Letter from C. R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Dated

July 5, 1996

Re: Reply to Notice of Violation, Inspection Report 96-004

NRC Notice of Violation 96-004-001

Technical Specification 6.8.a requires adherence to fire protection program implementing procedures. Kewaunee Fire Plan Procedure, FPP 08-01, "Fire Plan Operability, Surveillance, and Contingency Requirements," Revision C, requires that corrective actions be initiated for inoperable fire barrier seals and that a fire watch be initiated within one hour as a contingency action.

Contrary to the above:

From February 1994 to April 24, 1996, no corrective actions were taken for an inoperable barrier seal identified during a licensee's surveillance. In addition, no fire watch was assigned as a contingency action for this impairment.

WPSC Response

Wisconsin Public Service Corporation does not contest this violation.

Reason For Violation

This event occurred when personnel failed to initiate corrective actions when they identified a degraded fire penetration as required by the Fire Plan. Failure to implement the required corrective measures is attributed to personnel oversight and inattention to detail.

According to the plan, when a fire barrier is found in a degraded condition an internal corrective action report and work request shall be initiated. The plan also requires that for the time the penetration is in a degraded condition an hourly fire watch patrol the area to monitor the penetration. Contrary to these requirements, during the performance of Preventive Maintenance Procedure (PMP) 08-33, "Fire Protection System (FP) Penetration Fire Barrier Inspection," completed on March 8, 1994, neither an Incident Report (IR) or a Work Request (WR) were issued to evaluate and repair Penetration #817 nor was an hourly fire watch established.

During this performance of the PMP other penetrations were also noted to be in a degraded condition. With the exception of Penetration #817, in all cases, the corrective actions required by the plan were initiated.

Corrective Actions

This condition was identified by the NRC during a routine Fire Protection inspection. Within one hour of being notified of the condition, Plant Staff initiated an Incident Report (IR #96-085) and a work request (WR #209633), and established an hourly fire watch.

As part of the evaluation process, records of FP associated documents were searched for evidence of similar occurrences back to 8/29/86. The types of records reviewed included, surveillance, maintenance, corrective action, and fire watch records. This review did not reveal any indication that other FP penetration control problems similar to the subject of this event have occurred.

Document Control Desk

July 5, 1996

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Additional corrective actions consisted of involving the personnel responsible for the maintenance of the Fire Protection Program in the evaluation of the violation. The evaluation included reviewing the plan and program requirements for process deficiencies which would require correction to preclude similar occurrences. No deficiencies were noted. The program clearly states what is required when a degraded penetration is found and is adequate to control, evaluate and repair the condition. By their involvement in the evaluation, personnel maintaining the program have a heightened sense of awareness of the program requirements.

Based upon initiation of the required corrective actions for other degraded penetrations during the performance of the PMP in 1994 it is clear that the individuals involved were aware of the requirements. This, along with the lack of evidence to indicate that this is a recurring problem, supports a conclusion that no further corrective actions are necessary.

Compliance Schedule

Penetration #817 was restored to its design configuration on May 15, 1996 in accordance with General Maintenance Procedure (GMP) 208, "The Opening and Sealing of Penetration Seals." Following repairs to the penetration, the hourly fire watch was discontinued. Therefore, all corrective measures in response to the degraded fire penetration have been completed.