

# CATEGORY 1

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AUTH.NAME AUTHOR AFFILIATION  
MARCHI,M.L. Wisconsin Public Service Corp.  
RECIP.NAME RECIPIENT AFFILIATION  
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 960913 ltr re violations noted in insp rept  
50-305/96-05. Corrective actions: restored AFW-102A to proper  
position, revised governing procedures for tagout control &  
provided training to personnel re tagging process.

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October 15, 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 96-005

Reference: Letter from J. M. Caldwell (NRC) to M. L. Marchi (WPSC), dated September 13, 1996 (NRC Integrated Inspection Report 50-305/96005)

In the reference, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of the NRC inspection activities conducted May 14 through June 27, 1996.

During the inspection, NRC identified one Severity Level IV violation. The violation was cited due to a failure to return equipment to its normal operating status following maintenance. This was identified as being contrary to Kewaunee Technical Specification 6.8.a.

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.

Sincerely,

for Mark L. Marchi  
Manager - Nuclear Business Group

GIH  
Attach. 230013

cc - US NRC Senior Resident Inspector  
US NRC Region III

JEDI/1

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PDR ADOCK 05000305  
Q PDR

ATTACHMENT 1

Letter from M. L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

October 15, 1996

Re: Reply to Notice of Violation, Inspection Report 96-005

NRC Notice of Violation 96-005

Technical Specification 6.8.a requires implementation of procedures that meet the requirements of Section 5.3 of ANSI 18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."

Paragraph 5.3.5(3), "Maintenance Procedures - Post Maintenance Checkout and Return to Service", of Section 5.3 to ANSI 18.7-1976 states that instructions shall be included or referenced for returning equipment to its normal operating status.

Contrary to the above, on May 5, 1995, Tagout Control Sheet 95-0700 specified an incorrect restoration position for valve AFW-102A, "Recirculation Throttle Valve for the 'A' Motor Driven Auxiliary Feedwater pump", resulting in the valve being positioned to full open upon completion of preventive maintenance procedure (PMP) 05B-06 (Revision C), "Auxiliary Feedwater (AFW) Relief Valve Testing/Freedom of Movement and Setpoint Record." This condition was identified by the NRC inspectors on June 5, 1996.

WPSC Response

Wisconsin Public Service Corporation does not contest this violation. Our assessment of the condition concluded that the post-maintenance activities for returning equipment to service were not in accordance with requirements. Our assessment of AFW-102A being full open as opposed to throttled concluded this had no negative impact on the Auxiliary Feedwater (AFW) System or the associated AFW Pump. The pump remained capable of providing the minimum required postaccident flow.

Reason For Violation

This event was caused by personnel inattention to detail. After maintenance testing on the "A" motor driven Auxiliary Feedwater (AFW) Pump recirculation piping relief valve (AFW-140A), personnel failed to adequately review plant documentation when returning the valve to service.

Consequently, the individuals involved did not recognize the downstream isolation valve's (AFW-102A) normal operating position as being throttled. The post-maintenance restoration process did not restore the system to normal operating status. Therefore, full compliance with the tagout control process did not occur.

The Kewaunee process for removing and restoring equipment for this maintenance activity is provided by General Nuclear Procedure (GNP) 3.3.1, "Tagout Processing." The procedure provides guidance for identifying and verifying the proper positioning of equipment.

Restoration of equipment to service following maintenance is a two step process. The first step requires an individual be assigned by the Control Room Supervisor (CRS) to enter the restoration position on the Tagout Control sheet. The second requires an adequacy/accuracy verification. In this case, the individual who determined and entered the restoration position of AFW-102A on the Tagout Control Sheet did not identify the proper position. This error was not identified during the verification process.

Personnel performing tagging requirements of the GNP are expected to use their knowledge of plant systems and where necessary applicable plant documents when determining the positions necessary to isolate plant equipment for maintenance. The GNP specifies a comparison of plant documents to the Tagout Control Sheet position when performing the adequacy/accuracy verification. When returning equipment to service the same expectations apply.

Interviews were conducted with the individuals involved in this event. Due to the length of time between the event occurring and the condition being identified (13 months), personnel involved could not recall their specific actions with regard to how they performed the requirements of the procedure for the AFW System restoration to service. The individual involved in determining the restoration position could not recall what he used (i.e. procedure, drawing, etc.) in determining the restoration position. The individual involved in the adequacy/accuracy verification could not recall what his actions were to verify the restoration position.

Two possible scenarios may have caused the condition found:

- 1) Each individual involved may have used the associated system drawing (P&ID) to determine the restoration position, and both failed to recognize a "Note" in the drawing which denotes the valve as throttled. Flow diagram M-204, "Flow Diagram Condensate & Gland Seal System," graphically shows the valve as open. The drawing also has a note associated with the valve. The note defines the valve, along with others on the drawing, as throttled and describes how to establish the required position. The graphic depiction of the valve with an associated note to clarify a throttled condition is consistent with the Kewaunee drawing control program.
- 2) The individuals involved may not have paid adequate attention to the details of GNP 3.3.1. Therefore, the actions undertaken by those involved were not sufficient to fully implement the intent of GNP requirements to restore the system to normal operation.

### Corrective Actions

Subsequent to identifying the condition, AFW-102A was immediately restored to its proper position.

Additional corrective actions were:

- 1) Personnel interviews were conducted to determine the cause of the event.
- 2) Reviews of governing documents for removal and restoration of equipment for maintenance were performed.

The interviews and document reviews revealed the need for the following corrective actions:

- 1) Revise the governing procedures for tagout control to clarify and emphasize responsibilities of personnel involved in removal and restoration of equipment.
- 2) Provide training to personnel with responsibilities in the tagging process to clarify their responsibilities and emphasize management expectations with regard to fulfilling their responsibilities to ensure procedural compliance.

### Compliance Schedule

It is anticipated that the revisions to the procedure will be completed by January 1, 1997. The training will be performed as part of the current operator requalification cycle to be completed by June of 1997. Additionally, this NOV response will be distributed as required reading to personnel responsible for tagging activities as an interim corrective measure.