

# CATEGORY 1

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MARCHI, M.L.      Wisconsin Public Service Corp.  
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SUBJECT: Forwards response to NRC 961205 ltr re violations noted in insp rept 50-305/96-07 on 960813-1007. Corrective actions: util has initiated operations personnel performance review effort.

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January 6, 1997

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 96-007

References: 1) Letter from J. L. Caldwell (NRC) to M. L. Marchi (WPSC) dated December 5, 1996 (NRC Inspection Report 50-305/96007 and Notice of Violation).

In reference 1, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of NRC inspection activities conducted August 13 through October 7, 1996.

During the inspection, NRC identified one Severity Level IV violation. The violation was regarding a mispositioned valve during draining of the reactor coolant system. The condition was cited as being contrary to Kewaunee Technical Specification 6.8.a.

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

Sincerely,

Mark L. Marchi  
Manager - Nuclear Business Group

KJS  
Attach.

cc: US NRC Senior Resident Inspector  
US NRC Region III

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ATTACHMENT 1

Letter from M. L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

January 6, 1997

Re: Reply to Notice of Violation, Inspection Report 96-007

NRC Notice of Violation 96-007-001

Technical Specification 6.8.a requires implementation of procedures that meet the requirements of ANSI 18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." Section 5.2.2, "Procedure Adherence," of ANSI 18.7-1976, requires that procedures be followed. Procedure N-RC-36E (Revision V), "Draining the Reactor Coolant System," requires that reactor vessel vent valve RC-45B be open while draining the reactor coolant system.

Contrary to the above, on September 24, 1996, reactor vessel vent valve RC-45B was found shut during draining of the reactor coolant system.

WPSC Response

Wisconsin Public Service Corporation (WPSC) does not contest this violation. Our assessment of the condition has concluded that the personnel involved failed to implement plant procedures. Our assessment of the significance of the condition specific to the event concluded that there were no significant safety hazards involved. There were no personnel injuries and no risks to plant personnel. Using only one vent valve satisfies the intent of the procedure to drain the Reactor Coolant System (RCS).

Reason For Violation

This event was caused by personnel failing to implement procedural requirements in a timely manner.

As part of Kewaunee's scheduled refueling cycle, the reactor coolant system level is drained. Operating Procedure (OP) N-RC-36E, "Draining the Reactor Coolant System," lists the steps needed to drain and vent the RCS. Prior to performing N-RC-36E, a pre-job briefing was held. During the briefing the configuration of the head vent system and the associated valves' operation were specifically discussed along with the intent of the procedure. The head vent system contains 3/4 inch parallel valves RC-45A and RC-45B. The head vent piping is also 3/4 inch. Therefore, if either RC-45A or RC-45B is opened, an adequate vent path is available.

On September 23, 1996, N-RC-36E was started. During performance of step 4.1.12, the Operator placed the control switches for the reactor vessel vent valves RC-45A and RC-45B to open. In response to the Operator's action, RC-45A indication changed to open, RC-45B did not.

The individual involved stated that the failure of RC-45B to open was informally noted, since the intent of the step was met (i.e. RC-45A was open and provided a vent path). This action was specifically discussed and agreed upon in the pre-job briefing. Because RC-45B did not open, the associated substep of step 4.1.12 was not signed. The status of RC-45B was then discussed at shift turnover while reviewing N-RC-36E.

On September 24, 1996, following a NRC Inspector's inquiry of RC-45B position, the control switch for RC-45B was cycled and the valve opened. Subsequently the associated substep of step 4.1.12 was signed.

The cause of this event was failure to implement adequate administrative procedures to address the deficient condition in a timely manner. Even though the approach and method to address a vessel vent valve problem was discussed and agreed upon and the intent of step 4.1.12 was met, expectations are that procedures be adhered to in a timely manner or, if problems are identified, properly changed using existing administrative controls. In this case the individuals involved followed what they thought was an acceptable approach and therefore, failed to use current administrative controls to make changes to N-RC-36E.

An underlying cause of not using the proper administrative controls was a known operating problem with the vessel head vent valves. It was "common knowledge" that the vessel head vent valves exhibited difficulty opening without a differential pressure. This was previously determined by engineering using past plant experience and maintenance results.

The plant had experienced positioning problems with the vessel head vent valves as well as the RCS sample line valves which are a similar valve make. Past maintenance inspections by plant staff have not identified why the valves would not open without a differential pressure. This condition is not supported by the valves Technical Manual which states the valve is designed to open without a differential pressure. Also, past experience has shown that these valves may not open immediately, but if left with the switch in the open position they eventually have opened. This understanding of the valves operation caused the individuals involved to not immediately initiate administrative controls for the deficient condition.

#### Corrective Actions

In response to previous issues regarding operations events, WPSC had initiated an operations personnel performance review effort. This effort includes a review of this event. Results from this review effort will be used to address further corrective action needs.

A review of the operational characteristics of the vessel head vent valves and similar RCS sample line valves will be performed. Results and any need for further operational guidance will be communicated with plant personnel.

#### Compliance Schedule

It is our intent to complete the corrective measures during the first quarter of 1997.