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

SUBJECT: Forwards response to NRC 970129 ltr re violations noted in insp rept 50-305/96-014 on 961121-970102.Corrective actions: LER was issued notifying NRC of condition found.

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NRC-97-19

WISCONSIN PUBLIC SERVICE CORPORATION
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February 27, 1997

10 CFR 2.201

U. S. Nuclear Regulatory Commission
Attention: 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 96-014

References: 1) Letter from J. M. Caldwell (NRC) to M. L. Marchi (WPSC) dated January 29, 1997 (NRC Integrated Inspection Report 50-305/96014 and Notice of Violation)

2) Letter from M. L. Marchi (WPSC) to U. S. NRC Document Control Desk dated January 1, 1997 (Reportable Occurrence 96-011-00)

In reference 1, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of the NRC inspection activities conducted from November 21, 1996 through January 2, 1997.

During the inspection, NRC identified one Severity Level IV violation. The violation was cited due to a hydrostatic test of the Safety Injection System not being performed with the isolation valves nearest the Reactor Coolant System being closed as stated in the Kewaunee Technical Specifications. Included in the Notice of Violation (NOV), direction was provided that this response be submitted under oath or affirmation. This was discussed with the Resident Inspector. It was determined that the oath or affirmation requirement was not intended and was included in the NOV in error. Therefore, based upon this understanding, this response does not include an oath or affirmation statement.

Ieo1

050020

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

Sincerely,

Mark L. Marchi
Manager - Nuclear Business Group

GIH

Attach.

cc: US NRC Senior Resident Inspector
US NRC Region III

ATTACHMENT 1

Letter from M. L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

February 27, 1997

Re: Reply to Notice of Violation, Inspection Report 96-014

NRC Notice of Violation 96-014-000

Technical Specification 4.4.b.5.a. requires that those portions of the safety injection system in service post accident be hydrostatically tested by closure of the motor operated valves nearest the reactor coolant system.

Contrary to the above, during the 1994 and 1995 refueling outages, the hydrostatic test of the safety injection system was not performed with the motor operated valves nearest the reactor coolant system closed.

WPSC Response

Wisconsin Public Service Corporation (WPSC) does not contest this violation. WPSC agrees that the testing was not performed specifically as stated in the Technical Specifications (TS). However, the manner in which the testing was performed fully satisfied the intent of the TS. Therefore, no safety concerns existed.

Reason For Violation

The requirement for hydrostatic testing the safety injection (SI) system is to demonstrate sufficient system integrity to prevent excessive containment leakage. The TS requires that system leakage be verified below six gallons per hour totaled from the SI, internal containment spray (ICS), and residual heat removal (RHR) systems. Whether the valves nearest the RCS need to be closed or not is dictated by the conditions of the reactor coolant system (RCS). If the RCS is at a pressure greater than the shut-off head of the SI pumps, there is no need to close the valves. If the RCS pressure is lower, the valves need to be closed to ensure that full system pressure is achieved to obtain a test at system operating conditions. The basis for testing the system is to ensure that the system integrity is periodically confirmed. This is to ensure that Appendix J of 10CFR50 and 10CFR100 requirements are maintained. Therefore, as long as system operating pressure is achieved when the system is inspected for leakage the TS leakage test requirement is satisfied.

The TS wording is very prescriptive, to the extent that more conditions are specified than the minimum required to satisfy the intent of the testing. The wording of TS 4.4.b.5.a is as follows:

> Those portions of the Safety Injection System in service postaccident shall be hydrostatically tested by closure of the isolation valves nearest the Reactor Coolant System and operation of the pumps on the minimum flow test line to the Refueling Water Storage Tank. This test shall be performed during each major refueling outage.

The TS reference to the valves' position is descriptive of the manner in which testing was performed at the time of TS development. The position of the valves nearest the RCS is not germane to the intent of assuring acceptable leakage of system components and flanges. The appropriate position of the valves is best dictated by the RCS conditions and SI system operability requirements when the test is performed.

In 1987 the discrepancy between the TS and the manner in which the system is tested was noted. A corrective action proposed at the time was to submit a TS revision. The assessment of the discrepancy in 1987 concluded that the test being performed at full RCS pressure was equivalent to the valves being closed. However, a TS revision was never submitted.

Corrective Actions

On January 2, 1997, a Licensee Event Report (LER 96-011-00) was submitted notifying the NRC of the condition found (ref. 2). The LER noted that although the condition was reported under 10CFR50.73.(a)(2)(I)(B), "any event or condition prohibited by the plant Technical Specifications," at no time was the plant in a condition *prohibited* by TS requirements. WPSC notes that at all times the condition of the plant remained within TS requirements and SI system testing with the valves open was adequate to ensure the intent of TS was satisfied.

Corrective actions to be taken:

1) A test of the SI system will be performed with the isolation valves closed to eliminate any question of TS compliance.

2) A revision to the TS will be initiated.

3) Plant staff will be provided guidance on the importance of follow-up and closure of corrective actions.

Compliance Schedule

A test of the SI system with the valves nearest to the RCS will be performed prior to the SI system being required to be operable during the next startup. The time frame for when the plant is started up is dependent upon resolution of steam generator tube repairs. The earliest anticipated time for startup is by the end of the first calender quarter of 1997.

A revision to the TS will be submitted to the NRC six months prior to the next planned refueling outage when testing is next scheduled to be performed following this outage. However, until such time as TS are revised, any hydrostatic testing of the SI system to satisfy TS 4.4.b.5.a will be performed with the isolation valves closed.

Personnel guidance on corrective action follow-up and closure will be provided as part of future training efforts in the various plant corrective action control programs. This will be a continuing training effort.