

CATEGORY 1

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

SUBJECT: Responds to NRC 970701 ltr re violations noted in insp rept 50-305/97-02 on 970106-31. Corrective actions: review performed of plant documents which govern development of procedures & reveals guidance to staff is adequate.

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WIBCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

July 31, 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 97-002

- References:
- 1) Letter from G. E. Grant (NRC) to M. L. Marchi (WPSC) dated March 28, 1997 (NRC Inspection Report 50-305/97002 and Notice of Violation).
 - 2) Letter from M. L. Marchi (WPSC) to U. S. NRC Document Control Desk dated April 28, 1997 (Response to Notice of Violation, Inspection Report 97-002).
 - 3) Letter from J. A. Grobe (NRC) to M. L. Marchi dated July 1, 1997 (Notice of Violation, NRC Inspection Report 50/305/97002 (DRS)).

In reference 1, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of the NRC inspection activities conducted January 6, 1997 through January 31, 1997.

During the inspection, the NRC identified four Severity Level IV violations, one of which was failure to develop a procedure while performing troubleshooting activities. In reference 2, WPSC responded to the violations. In our response we disagreed that a violation occurred concerning the troubleshooting activity. In reference 3, NRC informed WPSC that the violation was still considered valid. The NRC stated the determination was based on no additional material information being provided by reference 2 or during a conference call held on May 19, 1997. Therefore, reference 3 requested our response to the violation.

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PDR ADOCK 05000305
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Jev

Document Control Desk
July 31, 1997
Page 2

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,



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

July 31, 1997

Re: Reply to Notice of Violation, Inspection Report 97-002

Document Control Desk
July 31, 1997
Attachment 1, Page 1

NRC Notice of Violation 97-002-001 (305/97002-01)

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

10 CFR 50, Appendix B, Criterion II, "Quality Assurance Program," requires, in part, that a quality assurance program be established and that the program be documented by written policies, procedures, or instructions and be carried out throughout plant life in accordance with those policies, procedures or instructions.

The Kewaunee Nuclear Power Plant (KNPP) Operational Quality Assurance Program Description (OQAPD), Revision 17, is the documented quality assurance program which implements the requirements of 10 CFR 50, Appendix B, Criteria II and V. Section 5.0, "Instructions, Procedures, and Drawings," of the KNPP OQAPD requires, in part, that measures shall be established in appropriate directives to control the preparation, format, content, and use of operating, test and maintenance procedures, and approvals for same.

Nuclear Administrative Directive NAD 12.4, "Special Plant Procedures," revision A, is an appropriate directive which implements the requirements of the KNPP OQAPD. Section 4.7 of NAD 12.4 requires that procedures be present for infrequently performed activities and activities that are extensive or complex and therefore cannot be committed to memory.

Contrary to the above, during the period December 20 through December 24, 1996, licensee personnel performed flushing of the auxiliary feedwater system, an infrequently performed activity which could not be committed to memory, without having a procedure of a type appropriate to the circumstances present.

WPSC Response

In the original response to this notice, Wisconsin Public Service Corporation (WPSC) contested this violation. However, the NRC maintained the violation as valid. The NRC's determination was based upon no additional material information being provided beyond that which was evaluated during the inspection. Although WPSC maintains that the activity of concern was

performed in accordance with expectations. WPSC acknowledges the Staff's concerns. Therefore, WPSC will no longer contest this violation.

WPSC maintains our original assessment that at no time was plant or public health and safety compromised by the activity identified as a concern by the NRC. The troubleshooting activity was performed on equipment that was not required to be operable, and the activity was performed using other administrative controls to ensure the status of the equipment was maintained and returned to the proper condition following troubleshooting.

Reason For Violation

WPSC used its judgement of using work instructions for troubleshooting activities as opposed to developing a formal procedure.

On December 19, 1996, while the plant was in refueling shutdown, a trace of chemical contaminants was discovered by the Chemistry group after sampling the Condensate Storage Tanks (CST). At the time, the auxiliary feedwater (AFW) system was not required to be operable. The contaminant discovery was made following a routine Surveillance Procedure (SP) run on the AFW pumps during which the CSTs are recirculated and in-service test data is obtained. The discovery prompted an investigation into the source. It was decided between the Operations and Chemistry work groups to locally sample at the pumps and flush the AFW piping involved as a method of troubleshooting a suspected leak through a valve which isolates Service Water to the suction of the B AFW pump.

During the discussion between the two groups, notes were written to assist in communicating the troubleshooting plan to the oncoming shifts. It was anticipated that the evolution would take place

over the course of a weekend. These notes were later typed and embellished by the next shift in the process of reviewing drawings and verifying the plan.

The violation is cited as a failure to satisfy a requirement under plant Nuclear Administrative Directive (NAD) 12.4 "Operating Procedures," specifically Step 4.7, "that procedures be present for infrequently performed activities that are extensive or complex and therefore cannot be committed to memory." The inspection report characterizes the situation as requiring a procedure of a type appropriate to the circumstances present. For this evolution, the personnel involved determined that the circumstances present did not require a procedure.

NRC identified that the activity circumvented the procedure review process in that the work instructions developed to perform the activity did not undergo the procedure review process. As stated in the May 19 conference call, the personnel involved in the development of the work instructions and the supervisory/management contacts made were commensurate with the normal procedure development process. However, it is acknowledged that the formal process used to develop and issue procedures was not followed.

Corrective Actions

A review was performed of the plant documents which govern development of procedures. This review revealed that the guidance available to plant staff is considered adequate.

The response to this violation will be provided to plant staff to provide guidance on when to develop a formal procedure to accomplish activities as opposed to using work instructions. We feel that this will cue the staff to consider additional aspects for a procedure being needed based

Document Control Desk
July 31, 1997
Attachment 1, Page 4

on the NRC staff concerns. In addition, WPS Nuclear Management will convey its expectations to plant staff personnel in meetings and other opportunities.

Compliance Schedule

The corrective action will be completed by distribution of the correspondence referenced in this response along with this response to plant staff. It is anticipated that the corrective actions identified above will be completed in six weeks.