

# CATEGORY 1

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ARCHI, M.L.      Wisconsin Public Service Corp.  
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SUBJECT: Responds to NRC 970716 ltr re violations noted in insp rept  
50-305/97-07. Corrective actions: submitted LER 97-006-00  
stating that LER would be required reading for operators &  
that audible prompt would be beneficial to operators.

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August 15, 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 97-007

- References:
- 1) Letter from G. E. Grant (NRC) to M. L. Marchi (WPSC) dated July 16, 1997 (NRC Inspection Report 50-305/97007 and Notice of Violation).
  - 2) Letter from M. L. Marchi (WPSC) to Document Control Desk dated July 3, 1997 (Reportable Occurrence 97-006-00).

In reference 1, 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, 1997.

During the inspection, NRC identified two Severity Level IV violations. The first violation was cited due to a failure in procedural performance regarding Technical Specification 4.1.a, "Operational Safety Review," Table TS 4.1-1, "Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels." The second violation was cited against 10 CFR 50, Appendix B, Criterion V.

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

GIH  
Attach.

cc: US NRC Senior Resident Inspector  
US NRC Region III

9708180213 970815  
PDR ADOCK 05000305  
Q PDR



ATTACHMENT 1

Letter from M. L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

August 15, 1997

Re: Reply to Notice of Violation, Inspection Report 97-007

NRC Notice of Violation 97-007-000

Technical Specification 4.1 a, "Operational Safety Review," required that the protective instrumentation channels listed in Technical Specification Table 4.1-1, Items 2, 3, 4 and 14 be checked each shift when the reactor is shutdown. Surveillance procedure SP 87-149 (Revision N), "Shift Instrument Channel Checks - Shutdown," was required to be performed each shift to implement the shift instrument channel check requirements of this technical specification.

Contrary to the above, the licensee identified that on June 4, 1997, operators did not perform Surveillance procedure SP 87-149, "Shift Instrument Channel Checks - Shutdown," during one shift on protective instrument channels for items 2,3,4, and 14 listed in Technical Specification Table 4.1-1.

WPSC Response

Wisconsin Public Service Corporation (WPSC) does not contest this violation. WPSC agrees that Surveillance Procedure (SP) 87-149, "Shift Instrument Channel Checks - Shutdown," was not performed during the day shift on June 4, 1997, as required by Technical Specification Table TS 4.1-1. However, a review of SP87-149 data sheets performed for the shift before and the shift after this event revealed no abnormalities. There were no abnormalities encountered, during the shift in question. Therefore, there was no increased risk to the health and safety of the public.

Reason For Violation

This specific event was caused by a combination of weak administrative controls and their ineffective use. The operations crew failed to realize that SP87-149 was not performed on their shift, and there was no formal control in place to ensure the SP was performed in the required time period.

Corrective Action

On July 3, 1997, a Licensee Event Report (LER 97-006-00) was submitted notifying the NRC of this event. The LER listed two corrective actions. The first corrective action stated that the LER would be required reading for the operations crew to reinforce use of the current administrative controls.

The LER is currently in the required reading binder in the control room. The second corrective action stated that an evaluation would be performed to determine if further corrective action was needed since this was a repeat occurrence.

It was determined, during the evaluation, that an audible prompt would be beneficial to the operators. This audible prompt will augment the current administrative controls and would remind the control operator to perform the applicable shiftly surveillance procedure.

#### Compliance Schedule

The LER will remain in the required reading binder until all required operations personnel have read the LER. The audible prompt will be incorporated into the plant process computer. The addition of the audible prompt to the plant process computer will be completed by the end of August 1997.

#### NRC Notice of Violation 97-007-002 (305/97007-02)

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," required that activities affecting quality be accomplished with prescribed procedures. General Nuclear Procedure GNP 8.2.1 (Revision C), "Work Request Processing," require that a work request be initiated to perform any non-routine testing on any QA1 component. Certain minor activities did not require a work request but required prior shift supervisor approval.

Contrary to the above, the licensee identified that on May 20, 1997, a chemistry technician [Technologist] failed to follow procedure GNP 8.2.1 and initiate a work request or obtain the shift supervisor approval when obtaining non-routine water samples from the casing of the auxiliary feedwater pumps, which are QA1 components.

#### WPSC Response

Wisconsin Public Service Corporation (WPSC) does not contest this violation. WPSC's assessment of the event revealed that required administrative controls were not followed when chemistry samples were taken from the auxiliary feedwater (AFW) system. At the time the

samples were taken, the AFW system was not required to be operable and the AFW pumps' control switches were in pullout. Therefore, no challenges to plant personnel or public health and safety existed.

#### Reason For Violation

On Tuesday, May 20, 1997, while the plant was in refueling shutdown, the Chemistry group determined that the quality of the water in the Condensate Storage Tanks (CST) had degraded. The data available to the Chemistry group indicated a decreasing trend in tank resistivity (beginning late the previous week) and CST samples had measurable ionic contamination. Based on available information, priorities were established to determine the cause of the contamination first, and then to confirm the extent of the contamination. Direction was given to begin the search for the contamination source at the Auxiliary Feedwater (AFW) pumps since a similar situation had been observed earlier in the outage.

Understanding that the AFW pumps were a possible source of the contamination, two Chemistry Technologists collected samples from AFW pump casing drain valves, MU-330A(B). During the sample collection, MU-330A was opened for approximately 15 seconds to collect its sample. MU-330B was opened longer due to the presence of suspended solids. MU-330B was opened four separate times for a total time open of approximately 60 to 90 seconds. The valve was cycled in such a way as to fill a bucket four times in an effort to purge accumulated solids from the sample point. Less than five minutes elapsed during the sampling of MU-330B. The sample on MU-330B confirmed that "B" AFW pump was the source of the ionic contamination. Operations submitted work request 212037 to repair SW-601B, service water system supply to AFW pump B, which was later found to be the cause of the contamination.

The cause of this event was a failure to communicate pertinent information. The general guidance in Chemistry is that Shift Supervisor (SS) knowledge and permission are needed prior to collecting

samples from any point not included in an approved Chemistry procedure. The failure was that no one from the Chemistry group explained to the SS the situation or the need to sample the AFW pumps. Chemistry personnel also failed to request Operations permission and support for sampling the AFW pumps. The personnel directed to obtain the samples were not specifically instructed to contact the SS, nor were they informed that the SS had not been contacted.

If the SS had been informed, the sampling activity would have been implemented under Plant Operations cognizance using their administrative controls, including: determinations regarding equipment operability, the need for tagouts, procedures, valve manipulations, etc. Without the SS's knowledge and authorization these controls were not implemented, and the sampling activity was required to be implemented in accordance with an approved chemistry procedure or the requirements of plant General Nuclear Procedure (GNP) 8.2.1, "Work Request Processing." Thus, the communications failure resulted in the noncompliance with General Nuclear Procedure (GNP) 8.2.1.

#### Corrective Actions

The failure to communicate with the SS regarding AFW pump valve operation is not indicative of overall poor communication between the Chemistry and the Operations groups. The miscommunication is isolated. The Superintendent-Plant Radiochemistry briefed the entire department on the expectation that they should follow approved procedures, that they should communicate readily and regularly with the SS, and that they should seek Operations support when confronted with unusual sampling requirements. The Chemistry staff acknowledged that they were aware of these expectations, but the affected individuals assumed that someone else had communicated the appropriate information with the SS.

No special corrective actions are needed to prevent a recurrence of this event. The 10 CFR 50, Appendix B, Criterion V guidance is applied through the use of approved procedures. Existing

Chemistry procedures do not cover unusual or non-routine sampling. WPSC believes that for non-routine samples that are not covered by approved Chemistry sample collection procedures, using the SS for sample collection work controls is appropriate, provided that the evolution is not detailed or complex enough to warrant a procedure. No additional corrective actions are required.

In an effort to better document sampling under non-routine conditions, the Superintendent-Plant Radiochemistry has directed that a "Sample Request Form" be generated. This "Sample Request Form" is expected to be available for use by the end of August 1997. WPSC feels that the new form will preclude similar occurrences.

#### Compliance Schedule

The "Sample Request Form" is expected to be available for use by the end of August 1997.