

# CATEGORY 1

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

SUBJECT: Responds to NRC 971121 ltr re violations noted in insp rept  
50-305/97-15 on 970916-1027. Corrective actions: reviewed  
certifications of all positions/individuals listed in Figure  
NAD 1.14-1, required to wear respiratory equipment.

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Public Service

NRC-97-134

Wisconsin Public Service Corporation  
(a subsidiary of WPS Resources Corporation)  
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1-920-433-5544 fax

December 22, 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 97-015

Reference: Letter from G. E. Grant (NRC) to M. L. Marchi (WPSC) dated November 21, 1997 (NRC Notice of Violation and Inspection Report No.50-305/97015).

In the reference, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of the NRC inspection activities conducted September 16 through October 27, 1997.

During the inspection, one Severity Level IV violation was identified. The violation was cited as a failure to adequately implement the procedures for the plant's Respiratory Protection Program.

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



9801020145 971222  
PDR ADOCK 05000305  
PDR

ATTACHMENT 1

Letter from M. L. Marchi (WPSC)

to

Document Control Desk (NRC)

Dated

December 22, 1997

Re: Reply to Notice of Violation, Inspection Report 97-015

NRC Notice of Violation 97-015-001 (50-305/97015-05)

Technical Specification 6.11 requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation.

Nuclear Administrative Directive 1.14, Respiratory Protection Program, Revision C, Steps 5.7 and 5.8, implements the above requirement by requiring that each respirator wearer shall receive respirator training annually and receive a quantitative fit test prior to initial use of respiratory protective equipment and annually thereafter, and by designating those individuals who were respirator wearers.

Contrary to the above, on October 7, 1997, the NRC identified that two individuals designated as requiring annual respirator fit testing were last tested in 1994.

WPSC Response

Wisconsin Public Service Corporation (WPSC) does not contest this violation. Our evaluation of the condition revealed that administrative controls were deficient to ensure continued personnel respirator qualifications. Our assessment of the condition determined the event did not compromise the safety of any member of the plant staff. Those members of the plant staff whose qualifications had expired had satisfactorily completed all but one phase of the requalification requirements. Subsequent respirator fit testing demonstrated that those individuals with expired qualifications continued to satisfy the respiratory protection requirements. With the exception of some fire brigade members who wore a respirator during fire training exercises, none of the individuals with expired certifications were identified as being required to wear respirators during the period of time that their certifications had expired. Furthermore, WPSC found no Occupational Safety and Health Administration (OSHA) requirement that specifies the fire brigade to have a fit test for self contained breathing apparatus use. However, we did find that we failed to satisfy a National Fire Protection Association (NFPA) standard. NFPA 1500, "Standard on Fire Department Occupational Safety and Health Program," requires annual fit testing.

Reason For Violation

This event was caused by a failure in the process used to implement the respiratory protection program. The management approved administrative controls were not specific to the point of requiring a verification or check to see if personnel respirator qualification requirements were completed.

The KNPP program for respiratory protection requires that individuals required to wear respirators be qualified for wearing a respirator. The program also requires annual verification of qualifications. The qualification requirement is satisfied by successful completion of three phases: 1) respiratory protection training, 2) a physical examination, and 3) mask fit testing while wearing a respirator. WPSC's investigation found that a total of 21 plant staff and 24 contract security staff had not received their periodic respirator fit tests. Therefore, these individuals' qualifications for respirator use had expired. In every case, the individuals had completed their training and physical examinations.

In accordance with the requirements of Nuclear Administrative Directive (NAD) 1.14, "Respiratory Protection Program," Revision C, each person affected had been scheduled for the activities necessary for certification. However, the follow-up actions taken to ensure that those individuals had indeed completed the activities were inadequate.

Responsibilities for implementation of the respiratory protection program are shared amongst a number of plant groups: the Training group schedules and conducts the individual training sessions, the Human Resources group schedules the physical examinations, the Health Physics group schedules and administers the in-situ fit tests, and the individual plant groups schedule personnel within their groups according to openings available. Furthermore, each individual is responsible for attending their scheduled qualification sessions.

Three causes were identified as contributing to this event. The two most significant causes were that: no single group or individual had responsibility for implementation of the program, and there is no specific administrative control to identify individuals whose qualifications are about to expire. A contributing cause to this event was that the 1996/7 refueling/maintenance outage was extended due to steam generator repairs and created scheduling difficulties not previously anticipated or encountered. These scheduling difficulties delayed some of the activities necessary for certification for wearing respiratory protective equipment. As a result, the fit testing of some individuals was not completed as required.

While evaluating this specific event, WPSC's review of the program documentation also found that the identification of personnel required to be respirator qualified needed clarification.

#### Corrective Actions

Short-term corrective actions included:

- 1) Reviewing the certifications of all positions/individuals listed in Figure NAD 1.14-1, as requiring certification for wearing respiratory protective equipment, to identify individuals whose certification was not current.
- 2) Scheduling and giving a respirator fit test to all personnel whose qualifications were expired.

Long-term corrective actions include:

- 1) Revising NAD 1.14 to more clearly define which job classifications/positions/individuals require respiratory protection certification. As part of this corrective action, a matrix has been completed which compares all plant and security staff against the requirements requiring various positions to be respiratory protection certified.

- 2) Analyzing the current process used to implement NAD 1.14 to identify what changes should be made to ensure that the process includes controls necessary to ensure certifications/qualifications are maintained current.
- 3) Reviewing this event with applicable groups/individuals involved in the certification process to raise the awareness of the requirements and the actions necessary to meet these requirements.
- 4) Reviewing this event at a Plant daily morning meeting to raise the awareness of the plant staff in general.
- 5) Including this event as part of the 1998 Respiratory Protection Training (lesson plan T-GET-LP RSP), which is given to all Plant and Security staff which require certification for wearing respiratory protective equipment (training is scheduled for the first quarter of 1998).

#### Compliance Schedule

The short-term corrective actions have been completed and all individuals required to be certified are current. The long term corrective actions are anticipated to be completed by the end of the first quarter of 1998.