

CATEGORY 1

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

SUBJECT: Responds to NRC 980727 ltr re violations noted in insp rept
50-305/98-08 on 980527-0706. Corrective actions: denies
violation, however, performing testing of containment spray &
safety injection pumps suction piping each refueling outage.

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Public Service

Wisconsin Public Service Corporation
(a subsidiary of WPS Resources Corporation)
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P.O. Box 19002
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1-920-433-5544 fax

August 26, 1998

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
Response to Inspection Report No. 50-305/98008 including Notice of Violation 98-008-002

Reference: Letter from G. E. Grant (NRC) to M. L. Marchi (WPSC) dated July 27, 1998,
Kewaunee Inspection Report 50-305/98008.

In the reference, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of the NRC routine inspection activities conducted May 27 through July 6 of 1998. During the inspection, the NRC identified an apparent violation concerning system leakage testing and one unresolved item regarding operation with the control rods fully withdrawn. As requested in the inspection report cover letter, Attachment 1 provides WPSC's response to the violation and the unresolved item.

If you should have any questions with regard to this response, please contact me or a member of my staff for clarification.

Sincerely,

Mark L. Marchi

for Mark L. Marchi
Site Vice President-Kewaunee Plant

RPP/DCL

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

August 26, 1998

Response to Inspection Report No. 50-305/98008
Including Notice of Violation 98-008-02

Notice of Violation 98-008-02

Technical Specification 6.12, "System Integrity," requires that a program be implemented to reduce leakage from systems outside containment that would contain highly radioactive fluids. The program shall include integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

Contrary to the above, prior to the September 1996 refueling outage, the licensee has never performed periodic integrated leak testing of all piping which could contain highly radioactive fluids during post-accident operation. Specifically, the suction piping to the safety injection pumps had not been periodically tested at the residual heat removal pump discharge pressure to verify acceptable system leakage. The residual heat removal pumps would provide the source of water to the safety injection pumps during post-accident operation.

WPSC Response

Wisconsin Public Service Corporation (WPSC) does not agree that there was a failure to satisfy Technical Specification (TS) 6.12, "System Integrity." WPSC is in agreement that (1) testing at a higher pressure would enhance the current leakage testing and as detailed below plans to continue pump suction piping pressure tests at an elevated pressure, and (2) there was a failure to implement a test described in the Updated Safety Analysis Report (USAR) Section 6.2.4, namely to perform periodic hydrostatic tests of the SI pump suction lines by running the RHR pumps and opening the flow path to the SI pumps.

In response to the short term lessons learned from TMI (NUREG-0578), Recommendation 2.1.6.a, WPSC developed a surveillance program focused on leakage reduction for those systems that could contain highly radioactive fluids outside containment. A description of this program was provided to the NRC in Reference A.1. The program was found acceptable by the NRC in Reference A.2 with the provision that the Office of Inspection and Enforcement would "review leak rate test and surveillance procedures,..." Subsequently during the 1980 Health Physics Appraisal (Inspection Report 50-305/80-026) and a routine safety inspection conducted in March 1981 (Inspection Report 50-305/81-001), the NRC concluded that WPSC had implemented the program required by TMI Recommendation 2.1.6.a and the program adequately meets the associated requirements. Additionally, NUREG-0737 specified that operating reactors fulfilled the requirements of Item

III.D.1.1, "Integrity of Systems Outside Containment Likely to Contain Radioactive Material," by satisfying Recommendation 2.1.6.a of NUREG-0578.

Contrary to the description of the proposed violation, WPSC performs integrated leakage testing of the safety injection pumps suction piping on a refueling frequency as required by the Technical Specification system integrity program. WPSC continues to perform the leakage testing of the safety injection pumps suction piping consistent with the method used at the time of the referenced NRC inspections. Since the program required by the Technical Specification is being implemented in accordance with the TS required frequency, WPSC respectfully denies that a violation occurred and requests that NRC withdraw the notice. Lastly, as a point of clarification, the safety injection suction piping was hydrostatically tested (at greater than the piping design pressure) prior to September 1996, actually in 1984, as part of the 10 year inservice inspection requirements with system leakage documented and corrective action taken as required.

As previously stated WPSC is in agreement that periodic testing as described in the USAR Section 6.2.4 is not being implemented. WPSC attributes this failure to a historical focus on ensuring that Technical Specification testing requirements are satisfied and a lesser emphasis on and knowledge of USAR testing requirements.

Corrective Actions

Since WPSC denies the subject violation, no corrective action is required for the violation. However, as detailed in the inspection report, WPSC is performing testing of the containment spray and safety injection pumps' suction piping for another purpose each refueling outage. WPSC currently plans to continue this periodic testing and agrees to modify the testing procedure to require a record of identified leakage and the initiation of any necessary corrective action. This will be completed prior to the next performance of the procedure.

To address the USAR testing discrepancy, WPSC will perform the specified testing or modify the USAR. Resolution of this will be completed by the next update to the USAR.

In addition, as committed to in Reference A.3, a comprehensive review of the USAR is in progress. One aspect of the review is to verify that any testing specified by the USAR is being appropriately performed. This will ensure programmatic controls are in place to accomplish testing as specified in the USAR.

References

- A.1. Letter from E. R. Mathews (WPSC) to H. R. Denton (NRC) dated December 31, 1979.
- A.2. Letter from A. Schwencer (NRC) to E. R. Mathews (WPSC) dated April 18, 1980.
- A.3. Letter from M. L. Marchi (WPSC) to Document Control Desk dated December 1, 1997.

Unresolved Item 98-008-01

The inspector questioned the licensee whether the current operating practice with all control rods fully withdrawn was consistent with the licensing and design basis. Of concern was that the licensee's USAR Chapter 7.2 (Table 7.2-3, Rod Withdrawal Stop), identified the control rod block as a feature to prevent an abnormal condition from increasing in magnitude and causing a reactor trip. The automatic control rod withdrawal block at 220 steps was an operational limit to a prompt reactivity insertion rate (control rod bite) whereas with the control rods further out (e.g., 230 steps) the control rod bite would be delayed. At the end of this inspection period, the licensee continued to evaluate the inspector's concerns. This issue is an unresolved item (URI) pending the licensee providing additional information with regard to whether the current practice of operating with bank D control rods fully withdrawn past the automatic control rod block deviates from the description in the facility's USAR and is possibly contrary to the licensing and design basis of the unit.

WPSC Response

WPSC agrees that during the first operating cycle the rod withdrawal limit was used as an upper control limit for the bank D control rods. Early in plant life (approximately 1975) plant operating practice changed and rods were fully withdrawn at full power. Due to the long time period since the change in practice, WPSC has been unable to find any documentation describing the basis for the change in operating practice. In 1981, as part of the first update to the FSAR, the verbiage describing RCCA bite was revised to be consistent with plant operating practice. To date, no analysis for this change has been found.

The change in operating practice has no safety significance as, per the Precautions, Limitations, and Setpoints document developed by Westinghouse for the KNPP, the rod withdrawal limit was only intended to minimize operation of the steam dump system during rapid power changes. Or in other words, it established a control limit, not a safety limit. The fact that the design function of this limit was to avoid dumping steam if a rapid power decrease was initiated makes it questionable as to whether it should have been included in USAR Table 7.2-3. Actuation of the steam dumps during a load rejection or runback is a design feature of the plant established to prevent an abnormal condition from increasing in magnitude.

Document Control Desk
August 26, 1998
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WPSC has initiated a KAP (i.e., the internal corrective action form) to document the inspector's concern and correct any USAR discrepancies. The initial evaluation of the concern indicates that the change in operational practice is not outside of the design basis of the plant.