

# CATEGORY 1

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 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service  
 AUTH. NAME: MARCHI, M.L.      AUTHOR AFFILIATION: Wisconsin Public Service Corp.  
 RECIPIENT AFFILIATION: Records Management Branch (Document Control Desk)

SUBJECT: Responds to NRC 990316 ltr re clarification of util response to violations noted in insp rept 50-305/98-14. Corrective actions: will conduct reviews of administrative process governing documents re personnel implementation of actions.

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April 15, 1999

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

10 CFR 2.201

Ladies/Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Reply to Notice of Violation Clarification Request, Inspection Report 98-014

- References: 1) Letter from J. A. Grobe (NRC) to M. L. Marchi (WPSC) dated November 13, 1998 (NRC Operational Assessment Team Inspection 50-305/98014 (DRS), Notice of Violation and Notice of Deviation)
- 2) Letter from M. L. Marchi (WPSC) to Document Control Desk dated December 14, 1998 (Reply to Notice of Violation and Deviation, Inspection Report 98-014)
- 3) Letter from J. L. Caldwell (NRC) to M. L. Marchi (WPSC) dated March 16, 1999 (Response to the Notice of Violation and Notice of Deviation (NRC Inspection Report 50-305/98014(DRS)))

In reference 2 Wisconsin Public Service Corporation (WPSC) responded to the notice of violation given in inspection report 98014, reference 1. In reference 2, WPSC documented our disagreement with one of the two examples the Nuclear Regulatory Commission (NRC) cited in support of the violation. WPSC did not contest the violation and concurs with NRC's underlying concern. The NRC has expressed their continued assessment that a violation did in fact occur in the example cited and has handled WPSC's response as if it were contested. In reference 3, the NRC requested further clarifications of WPSC's intended corrective actions in response to the violation. WPSC wishes to reaffirm we are not contesting the violation. Regardless of the example, the NRC inspection identified areas for improvement in the operation of the Kewaunee plant.

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The attachment provides our response to the NRC's request. If you should have any questions with regard to this response, please contact me or a member of my staff.

Sincerely,



Mark L. Marchi  
Vice President-Nuclear

GIH

Attach.

cc: US NRC Senior Resident Inspector  
US NRC Region III

ATTACHMENT

Letter from Mark L. Marchi (WPSC)

to

Document Control Desk (NRC)

Dated

April 15, 1999

Re:

Reply to Notice of Violation Clarification Request, Inspection Report 98-014

### NRC Request For Clarification

The corrective actions associated with the cited violation included an assessment of the outstanding danger cards, the technical content inadequate procedure program and other processes to verify that sufficient guidance is provided to ensure temporary procedure changes are made when required. As discussed during the January 15, 1999, conference call, we are requesting clarification of your intended actions.

### Wpsc Response

The following are the corrective actions followed by the clarifications:

- 1) Reviews of administrative process governing documents which provide personnel guidance for implementing actions will be conducted. The purpose of the reviews is to identify where temporary procedure change guidance may be required. Subsequent to these reviews changes to applicable documents will be implemented.

Kewaunee's primary directives for procedure development are Nuclear Administrative Directives (NAD) 3.1 and 3.2. These directives describe how to develop and revise procedures. These directives also describe the review and approval process for permanent and temporary procedure changes. These procedures are currently being revised. The revised procedures will provide more understandable and consistent guidance. We anticipate that these procedures will be reviewed and approved by May 15, 1999.

NADs also define the requirements for other processes at the plant. In some cases either the plant directive or its implementing procedure, GNP (General Nuclear Procedure), directs the user to develop instructions or procedures. The intent of this corrective action is to review Kewaunee's Governing procedures (NADs and GNPs) to ensure they are consistent with the guidance provided in the revised NADs 3.1 and 3.2.

Due to the broader nature of this corrective action, and the considerable resources required, it is anticipated it will be completed six to nine months following the revision of NADs 3.1 and 3.2.

- 2) Outstanding danger cards will be reviewed to determine if any actions or information provided by danger cards should have resulted in temporary procedure changes being implemented. If this review finds that temporary procedure changes should have been implemented, then appropriate changes will be made.

The intent of this corrective action was to ensure procedure change requirements were not circumvented. Specifically, all danger cards in place throughout the plant were reviewed. Any danger card which provided instructions were reviewed against procedures associated with the tagged equipment. The comparison ensured temporary or permanent procedure changes were made in accordance with the plant's procedure directives.

- 3) Additional guidance will be provided to plant staff on the basis for TCI control sheets. This guidance will include specific instructions to ensure that personnel are aware that they need to implement the temporary procedure change requirements when using a portion of the procedure that is controlled by the TCIs.

The intent of this corrective action was to ensure common staff understanding of the purpose of the revision control process. To this end the Group Leaders reviewed the purpose, scope, and proper process for using "technical content inadequate (TCI)" control sheets with plant groups. This was done to ensure personnel are aware that the control sheet is information only and that governing procedure revision processes shall be employed before any action is taken to use the procedures.

- 4) Kewaunee is currently in the process of revising the governing documents for plant procedure development, revision and control. Included in this effort are proposed changes to enhance temporary procedure change guidance and the use of the TCI control sheets. Subsequent to completing the directive revisions, plant staff training will be provided to re-emphasize the temporary change processes for procedures.

Kewaunee's primary directives for procedure development are Nuclear Administrative Directives (NAD) 3.1 and 3.2. These directives describe how to develop and revise procedures. These directives also describe the review and approval process for permanent changes, temporary

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procedure changes, and will provide expanded guidance on the use of TCI control sheets. These procedures are currently being revised. The revised procedures will provide more understandable and consistent guidance. We anticipate that these procedures will be reviewed and approved by May 15, 1999. The procedure changes will be discussed during general employee training (GET).