## Enclosure 1

SALP 8

# FINAL SALP REPORT

# U.S. NUCLEAR REGULATORY COMMISSION

## REGION III

# SYSTEMATIC ASSESSMENT OF LICEMSEE PERFORMANCE

Inspection Report No. 50-305/91001

Wisconsin Public Service Corporation

Kewaunee Nuclear Power Plant

December 1, 1988 through November 30, 1990

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### Enclosure 1

## KEWAUNEE NUCLEAR POWER PLANT

# A. <u>Summary of Meeting with Wisconsin Public Service Corporation on</u> February 28, 1991

The findings and conclusions of the SALP Board are documented in Report No. 50-305/91001 and were discussed with the licensee on February 28, 1991, at the Kewaunee Nuclear Power Plant.

While the meeting was primarily a discussion between the licensee and NRC, it was open to members of the public as observers.

The following licensee and NRC personnel were in attendance.

# Wisconsin Public Services Corporations

L. Stoll, Chairman of the Board/CEO D. Bollom, President and Chief Operating Officer C. Steinhardt, Vice President-Nuclear Power K. Evers, Manager-Nuclear Power M. Marchi, Plant Manager

## Nuclear Regulatory Commission

A. B. Davis, Regional Administrator
H. J. Miller, Director, Division of Reactor Projects (DRP)
J. A. Zwolinski, A/D for Region III Reactors, Office of Nuclear Reactor Regulations (NRP)
J. N. Hannon, Project Directorate III-3, NRR
R. C. Knop, Branch Chief, DRP
R. L. Hague, Section Chief, DRP
M. J. Davis, Project Manager, NRR

P. I. Castleman, Senior Resident Inspector

K. G. O'Brien, Resident Inspector

## Other

# Wisconsin Power and Light

J. D. Loock, Director, Generating Station Engineering

#### Madison Gas and Electric

J. T. Krzos, Treasurer

## R. Comments Received from Licensee

Wisconsin Public Service Corporation's response to the Kewaunee Initial SALP 8 Report dated April 1, 1991, included several comments that have resulted in minor revisions to the Initial SALP Report. These changes are listed in Enclosure 2 and the revised pages are included as Enclosure 3.

The affected pages of the Initial SALP Report should be replaced with the corrected pages included in Enclosure 3.

# C. <u>Regional Administrator's Conclusions Based on Consideration of Licensee</u> Comments

I have concluded that the overall ratings in the affected areas have not changed.

# Enclosure 2

# REVISION SHEET

PAGE	LINE	NOW READS	SHOULD READ
5	24	of the 24	of the 23
	25	for a 92%	for a 96%
14	8	by the 92%	by the 96%
Basis:	Subsequent examinee at	to the SALP period, a decision a later date.	was made to reexamine one
13	17-18	needed the technical department's closeout review.	needed closeout by technical review, fire review and/or quality control.
Basis:	Clarification of extent of review process.		
10	49-50	to discuss declining enforcement performance.	to discuss its program to improve the effectiveness of security in light of the declining enforcement performance.
Basis:	To better characterize meeting agenda.		
20	24-25	extended the KNPP license from 30 years to 40 years.	modified the KNPP license to reflect a 40 year life from date of issuance of the operating license.

Basis: To correct description of purpose of Amendment No. 82.

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with appropriate management oversight and plant staff awareness. The licensee's generally strong implementation of the emergency operating procedures (EOPs) was another example of the licensee's good approach to addressing technical issues, as demonstrated by good performance on simulator exercises and the EOP inspection. However, on several occasions the operators did not elevate to plant management, operational concerns of potential safety significance discovered during maintenance and surveillance testing activities.

Plant operations staffing and qualifications remained excellent, although the number of licensed operators had decreased since the previous assessment period from a total of 42 to 36. The reduction resulted from moving some licensed operators to training and technical staff positions in an effort to strengthen the breadth of technical knowledge in these staff areas while providing career growth opportunities. Despite these decreases, the licensee maintained operators on a six- shift rotation while keeping overtime well within administrative limits.

The operator training process was effective. Six of the seven initial license candidates passed their examinations, compared to eleven of eleven success all examinations during the previous assessment period. Of the surrequalification examinations given during the period, 22 examines, passed, for a 92% success rate. No requalification examinations had been given in the previous assessment period, so there was no opportunity for comparison.

# 2. Performance Rating

The licensee's performance is rated Category 1 in this area. The licensee's performance was rated Category 1 in the previous assessment period.

## 3. Recommendations

None.

# B. Radiological Controls

#### 1. Analysis

Evaluation of this functional area was based on the results of three inspections performed by regional-based inspectors and several observations by the resident inspectors. There were 189 inspection hours expended in this functional area, comprising 4.1% of the total inspection hours.

Enforcement history in this functional area was good. One Severity Level V violation was identified.

Management's involvement in assuring quality in this functional area was good, as evidenced by the licensee's good technical

The 1989 emergency exercise was successful and all significant aspects of the emergency plan were adequately exercised. Overall performance was very good, and no exercise weaknesses were identified. The 1990 emergency exercise was also successful. However, two exercise weaknesses, related to dose projection and emergency classification, were identified. The resident inspectors' observations of emergency drills indicated professional attitudes by drill participants and timely correction of identified problems.

The licensee's response to operational events was not evaluated because no activation of the emergency plan in response to an actual event occurred.

Staffing of emergency response positions was good; the authorities and reponsibilities were well defined. The licensee has increased its deviated emergency preparedness staff to three full-time members. An eledge and capability of personnel to carry out their emergency response duties and responsibilities were well demonstrated during annual emergency preparedness exercises, as well as in walkthroughs during the routine inspection. This indicated that the licenseet training program had adequately prepared personnel for the response assignments.

## 2. Performance Ratino

The licensee's performance is reted Category 1 in this area. The licensee's performance was rated Category 1 in the previous assessment period.

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# . <u>Recommendations</u>

None.

#### E. Security

### 1. Analysis

Evaluation of this functional area was based on the results of four inspections performed by region-based inspectors and observations made by the resident inspectors. There were 202 inspection hours expended in this functional area, comprising 4.4% of the total inspection hours expended during the assessment period.

Enforcement-related performance was poor during the first half of the assessment period, as eight Severity Level IV violations were identified. At the licensee's request, a management meeting was held 18 months into the assessment period to discuss declining enforcement performance. All eight violations preceded the management meeting and involved isolated management issues and technical performance weaknesses. Enforcement performance improved in the last six months of the assessment period with no further violations being identified. Ticensee was taking steps to correct these operator licensing examination deficiencies. These steps included contacts with the Region III office for review of material and changing the reporting structure for training from the corporate office to the site.

A noted weakness was the past practice of not involving engineering personnel in the ongoing maintenance process which, at times, resulted in reportable events caused by technically deficient maintenance or surveillance procedures. Examples of this weakness included several unplanned actuations of ESF equipment during maintenance and surveillance activities, failure to adequately test backdraft dampers in the containment ventilation system, and the unplanned loss of power to in-plant buses during the 1990 refueling outage. In addition, management allowed the development of a backlog of approximately 3000 completed work requests that needed the technical department's closeout review. In an effort to improve its performance, the licensee reorganized the engineering groups to integrate engineering responsibilities into the maintenance department. The new plant engineering group. while not fully staffed, was created to become directive involved and assist with routine maintenance activities and provide engineering/technical support to all maintenance groups. Because the program was new, its effectiveness could not be evaluated during this assessment period.

The licensee's approach to the contification and resolution of technical issues from a safety standpoint was adequate. Throughout the assessment period, angineering had generally demonstrated a clear understanding of technical issues. The licensee's approach to the resolution of these issues was generally technically sound and conservative. Examples included: the installation of the new safeguards battery; the replacement of the #1 seal in reactor coolant pump 1B; and the analyses and proposed corrective action in documented failures of safety-related components. Another example of thorough technical evaluation was the licensee's effective resolution of NRC concerns regarding axial cracks in SG tubes. This resolution included development and implementation of revised eddy-current test results analysis, appropriate additions and deletions to tube plugging lists, and extraction of two tubes for laboratory analysis.

Engineering and technical support staffing was relatively stable and well qualified. However, although the staff in the past had been sufficient to attend to most engineering needs, it was strained during this assessment period, as demonstrated by the large backlog of completed maintenance work requests awaiting technical closeout review. Late in the assessment period, the licensee initiated actions to increase the engineering staff during the next assessment period. In addition, the limited size of the training staff hindered the implementation of the operator requalification program, as discussed previously. The limited number of evaluators used by the licensee during the actual requalification examinations hampered the progress of the examinations and, as a result, last-minute schedule changes were required, unnecessarily lengthening the examination process.

Despite the programmatic weaknesses discussed above, the licensee effectively prepared operators for the two NRC-administered requalification examinations as evidenced by the 92% passing rate. Of the six crews that were evaluated, only one crew failed the simulator examination. Two operator initial examinations were also given which resulted in an 86% passing rate.

Staff engineers participate in the shift technical advisor program, attending a nine-month training course. This course constituted the bulk of their training activities. No examples of inadequate training were found to be the root cause of any engineering problems.

## 2. Performance Rating

The licensee's performance is rated Category 2 in this area. The licensee's performance as rated Category 1 in the previous assessment period.

3. Recommendations

None.

G.

# Safety Assessment/Ouality Verification

## 1. Analysis

Evaluation of this functional area was based on the results of several routine inspections performed by resident and region-based inspectors and by the NRR licensing project manager. There were 757 inspection hours expended in this functional area, comprising 16.4% of the total inspection hours expended during the assessment period. Contributions were also made to the functional area based on other inspections that indirectly evaluated Safety Assessment/Quality Verification.

Enforcement history in this functional area was generally good; two Severity Level IV violations were issued. Corrective actions for these two violations were timely and effective, and the lack of recurrence of these problems indicated that the licensee's root-cause analyses and associated corrective actions were effective.

Most of the reportable events which occurred in this functional area resulted from discoveries made during the licensee-initiated SSFIs of conditions that existed in the plant which did not meet the plant's design basis. The licensee reported these events in a timely manner, and the quality of the reports indicated that the events were properly identified and analyzed. The licensee's evaluation of the single automatic reactor trip that occurred De good. One Severity Level 1V violation was issued, due to failure to document the technical bases of calculations for EOP set points (Inspection Report No. 305/89012).

b. From October 2 through 6, 1989, a special inspection of activities regarding the implementation of Generic Letter 85-06 relative to ATWS mitigating systems was conducted. The level of quality assurance applied to the ATWS mitigation system actuation circuitry modifications was found to have generally exceeded the guidance given in GL 85-06 and personnel licensing, engineering, and operations appeared to have been well trained and knowledgeable of ATWS systems (Inspection Report No. 305/89013).

c. From June 4 through 22, 1990, a special maintenance team inspection was conducted. Overall, the implementation of the maintenance program was found to be good. One Severity Level IV violation was identified, regarding inadequate control of measuring and test etu pment. In addition, another violation was identified, but not cited, regarding failure to follow fire protection procedures (the spection Report No. 305/90011).

# 3. Significant License Amendments

d.

- a. Amendment No. 82, issue May 26, 1989, extended the KNPP license from 30 years to 0 years.
- b. Amendment No. 84, issued December 22, 1989, changed KNPP Technical Specifications (12), revising test frequency of turbine stop, control, and intercept valves.
- c. Amendment No. 85, issued March 17, 1990, changed KNPP TS, decreasing refueling shutdown magin.

Amendment No. 87, issued June 22, 5390, changed KNPP TS requirement concerning reaction cool of system leak testing and weld examination. This amendment also eliminated cold shutdown requirements regarding long-term loss of one train of the component cooling water or service water system. with appropriate management oversight and plant staff awareness. The licensee's generally strong implementation of the emergency operating procedures (EOPs) was another example of the licensee's good approach to addressing technical issues, as demonstrated by good performance on simulator exercises and the EOP inspection. However, on several occasions the operators did not elevate to plant management, operational concerns of potential safety significance discovered during maintenance and surveillance testing activities.

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3. Recommendations

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### 3. Recommendations

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- c. From June 4 through 22, 1990, a special maintenance team inspection was conducted. Overall, the implementation of the maintenance program was found to be good. One Severity Level IV violation was identified, regarding inadequate control of measuring and test equipment. In addition, another violation was identified, but not cited, regarding failure to follow fire protection procedures (Inspection Report No. 305/90011).

## 3. Significant License Amendments

- a. Amendment No. 82, issued May 26, 1989, modified the KNPP license to reflect a 40 year life from date of issuance of the operating license.
- b. Amendment No. 84, issued December 22, 1989, changed KNPP Technical Specifications (TS), revising test frequency of turbine stop, control, and intercept valves.
- c. Amendment No. 85, issued March 14, 1990, changed KNPP TS, decreasing refueling shutdown margin.
- d. Amendment No. 87, issued June 22, 1990, changed KNPP TS requirement concerning reaction coolant system leak testing and weld examination. This amendment also eliminated cold shutdown requirements regarding long-term loss of one train of the component cooling water or service water system.



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April 1, 1991

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

Gentlemen:

Docket 50-305 Operating License DPR-43 Kewaunee Nuclear Power Plant Comments on SALP 8

Reference: 1) Letter from A. B. Davis (NRC) to C. R. Steinhardt (WPSC) dated February 5, 1991

Thank you for the opportunity to meet with you and discuss the Systematic Assessment of Licensee Performance (SALP) report on February 28, 1991. This letter and attachment provide our comments on the SALP report transmitted to Wisconsin Public Service Corporation (WPSC) in reference 1. General comments follow and specific comments are detailed in the attachment.

In the previous SALP report, you cautioned that Kewaunee should not rest on past achievements but should continue to strive to remain an excellent performer. We recognized this challenge and the continuing challenge of being a leader in the nuclear industry. To meet that goal, substantial additional company resources have been allocated to the Kewaunee Plant in the last two years. This has included significant staff additions, improvements in operating experience assessments, increased quality of 50.59 safety evaluations and upgrades to security system hardware. New initiatives have also been taken to implement reliability centered maintenance, safety system self-assessments, a more structured configuration management program, and upgrades to the procurement process. We further appreciate your recognition of our safety system functional inspection program as the best in the region and the large resource commitment this program requires. We concur with your assessment that this program is providing immediate and substantial improvements in the level of plant safety. In total, these actions were taken to improve Kewaunee operations and to maintain our high level of performance as reflected in your previous assessments.

Document Control Desk April 1, 1991 Page 2

The current SALP report attributes the declining performance to weaknesses in management oversight and the high threshold at which problems are raised to management for resolution. Even though these weaknesses were not seen as pervasive, we are concerned and consider them very significant. The highly qualified and dedicated staff are a major contributor to Kewaunee's success, because these individuals have been entrusted with significant responsibilities for implementation of plant activities. This practice is a cornerstone in implementation of our Total Quality Focus program. Changing this effective and successful culture by removing day-to-day decision making and problem resolution at the supervisor and worker levels could jeopardize the sense of ownership and pride these individuals hold for Kewaunee. Any changes must be carefully considered so as to not disrupt this critical and essential balance between individual worker's responsibility and management oversight. In the Fall of 1990, some changes were made to address this concern by lowering the threshold for initiating incident reports and procedure exception reports. These reports receive management scrutiny and review. In examining our operating performance and maintenance history, we believe we have a staff that is sensitive to bringing in appropriate support when needed. Occasionally, this may not happen, but as stated in the report, this is not seen as pervasive, and we are working on improving management and worker sensitivity to this issue.

In conclusion, WPSC has taken actions during the SALP period to resolve many of the concerns identified in the report and to strengthen performance in the SALP functional areas. This has included staff augmentation, realignment of engineering resources and operator training, and upgrades to the security program. Realignment of engineering resources will provide additional technical support for resolution of plant maintenance issues. These actions are indicative of our proactive efforts to improve Kewaunee operations and our continuing commitment to obtaining performance ratings of 1 in all SALP functional areas.

Again, we appreciate the opportunity to comment on this report, and the effort you have taken to appraise our performance.

As always, we will be happy to discuss these comments with you.

Sincerely,

Van Atimader

C. R. Steinhardt Vice President - Nuclear Power

RPP/jac

Attach.

cc - US NRC - Region III Mr. Patrick Castleman, US NRC

# Attachment 1

to

# Letter from C. R. Steinhardt to Document Control Desk

Dated

April 1, 1991

Document Control Desk April 1, 1991 Attachment 1, Page 1

## COMMENTS ON SALP REPORT

- In early 1991, we received notification that one examinee in the requalification program would be rescheduled for an exam at a later date. The section on plant operation (Page 5) could be changed to reflect 22 of 23 examinees passed, for a 96% success rate with one examinee to be re-examined at a later date. Reference your letter dated January 31, 1991 on Docket No. 55-4638. Page 14 could be similarly changed.
- The discussion on page 13 refers to approximately 3000 completed work requests that needed the technical department's closeout review. This statement does not clearly represent the closeout process. The Maintenance Team Inspection Report noted that almost 3000 completed WR's had not been reviewed for closeout by technical review, fire review and quality control. This is a sequential review process and many of the work requests had received a technical review/fire review and were in quality control awaiting work request package assembly prior to transmittal to the records vault.
- Page 10 refers to a management meeting being held at the request of WPSC to discuss declining enforcement performance. The purpose of the meeting was to discuss changes made and being made to upgrade the Security Program at Kewaunee. This is reflected in your meeting report (50-305/90012(DRSS)) which states, "A meeting was conducted at the request of the licensee to discuss their program to improve the effectiveness of security at the Kewaunee site."
- On page 20, the purpose of Amendment No. 82 may be unclear. The license was modified to reflect a 40 year life from date of issuance of the operating license (December 21, 1973). This moved the expiration date of the license five years into the future.

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