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 AUTH. NAME: CHROCK, C.A.      AUTHOR AFFILIATION: Wisconsin Public Service Corp.  
 RECIP. NAME:      RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Respond to NRC 930818 ltr re violation noted in Insp Rept  
 50-305/93-11 concerning SE performed in 1990. Corrective  
 actions: refresher training on performance of SEs tentatively  
 scheduled to occur within next 6 months.

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**WISCONSIN PUBLIC SERVICE CORPORATION**

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

September 17, 1993

10CFR2.201

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Reply to Notice of Violation 93-011

Reference: Letter from M. A. Ring (NRC) to C. A. Schrock (WPSC) dated August 18, 1993  
(Inspection Report 93-011)

In the reference, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of an inspection of Kewaunee's design change and temporary change processes. During the inspection, the NRC staff identified one violation concerning a safety evaluation performed in 1990. The attachment to this letter provides our response to this violation.

Sincerely,

Charles A. Schrock  
Manager - Nuclear Engineering

TJW/cjt

Attach.

cc - US NRC, Region III  
US NRC Senior Resident Inspector

fic/nrc134.wp

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PDR ADOCK 05000305  
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**ATTACHMENT 1**

to

**Letter From C. A. Schrock (WPSC)**

to

**Document Control Desk (NRC)**

**Dated: September 17, 1993**

**NUCLEAR REGULATORY COMMISSION (NRC) NOTICE OF VIOLATION**

During an NRC inspection conducted on June 14 through July 1, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion III, "Design Control," requires, in part, that design changes be subject to design control measures commensurate with those applied to the original design.

Contrary to the above, temporary change requests 87-21, 87-22, and 90-15 installed September 3, 1987, and July 5, 1990, were not subject to design control measures commensurate with those applied to the original design in that seismic evaluations had not been performed and documented.

This is a Severity Level IV violation (Supplement 1).

**WISCONSIN PUBLIC SERVICE'S (WPSC's) RESPONSE**

The installation of additional drain valves on the discharge piping of the charging pumps is documented in temporary change requests (TCRs) 87-21, 87-22, and 90-15. However, the seismic adequacy of the design was not documented at the time of installation. When WPSC was made aware of the missing documentation, steps were taken to verify and document the seismic adequacy of the installed design. This has since been completed and the TCR files have been updated to reflect the adequacy of the existing design.

Since the drain valves have been installed for approximately three to six years, we are unable to determine if the engineers involved failed to document the seismic adequacy of the design or if they failed to consider seismic requirements in the design. Either cause is indicative of a need for additional training. As noted in the inspection report, we have improved the safety evaluation portion of our training program since 1990. In addition to these recent improvements, refresher training on the performance of safety evaluations is tentatively scheduled to occur within the next 6 months. The training will be provided to members of the engineering staff that are typically responsible for performing safety evaluations. It will include a review of the weaknesses identified in inspection report 93-011 associated with safety evaluations and Kewaunee's procedures for performing safety evaluations.