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 AUTH. NAME: SCHROCK, C.A. AUTHOR AFFILIATION: Wisconsin Public Service Corp.
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SUBJECT: Responds to NRC 930901 ltr re violations noted in Insp Rept 50-305/93-12. Corrective actions: USAR will be revised to reflect how control room post-accident recirculation sys described in EOP E-ACC-25.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

October 1, 1993

10 CFR 2.201

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

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Response to Notice of Violation 93-012-01

Reference: Letter from L.R. Greger (NRC) to C.A. Schrock (WPSC) dated September 1, 1993 (Inspection Report 93-012)

In the reference, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of an inspection by Kewaunee's Resident Inspectors. During the inspection, one violation concerning a safety evaluation performed in 1991 was identified. The attachment to this letter provides our response to this violation.

Sincerely,

Charles A. Schrock
Manager - Nuclear Engineering

TJW/jag

Attach.

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

lic/nrc/40.wp

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PDR ADOCK 05000305
G PDR



ATTACHMENT 1

to the Letter

From: C.A. Schrock (WPSC)

To: Document Control Desk (NRC)

Dated: October 1, 1993

Re: Inspection Report 93-012

NUCLEAR REGULATORY COMMISSION (NRC) NOTICE OF VIOLATION

During an NRC inspection conducted from May 28 through July 31, 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 50.59 "Changes, Tests and Experiments," requires, in part, that records of changes made to the facility, as described in the safety analysis report, shall provide the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, Safety Evaluation Report, Revision 0, dated March 8, 1991, for DCR 2373-2, "Control Room Post-Accident Recirculation Dampers ACC-3A & ACC-3B and Fresh Inlet Damper ACC-2," did not identify that the change created the possibility of a different type of malfunction than previously evaluated in the safety analysis report, did not adequately determine if the change involved an unreviewed safety question, and consequently did not provide an adequate bases for the determination that the change did not involve an unreviewed safety question. (305/93012-01)

This is a Severity Level IV violation.

WISCONSIN PUBLIC SERVICE'S (WPSC'S) RESPONSE

Design Change Request (DCR) 2373-2 was implemented in April 1991 to remove the interlock between the fresh air inlet damper (ACC-2) and the redundant recirculation dampers (ACC-3A and ACC-3B) in the control room post-accident recirculation (CRPR) system, refer to attachment 2. Removal of the interlock prevents a single failure of ACC-2 from isolating recirculation flow through ACC-3A or ACC-3B. As noted in the inspection report, the design package for the DCR failed to provide adequate justification that the removal of the interlock did not increase the probability of bypassing the charcoal filters. Bypassing the filters would allow unfiltered contaminated air to enter the control room.

In addition to the weakness described in the inspection report, an additional weakness was also identified in the implementation of DCR 2373-2 with regard to follow-up documentation. As part of the modification process, the project manager is required to submit a revision to the Updated Safety Analysis Report (USAR) to reflect the current design of the plant. The engineer responsible for the DCR and USAR updates revised the USAR to reflect the removal of the interlock. However, the revision to the USAR was not consistent with the steps in the emergency operating procedure for the CRPR system. The USAR states dampers ACC-3A and ACC-3B will be closed once damper ACC-2 is opened. However, Emergency Operating Procedure E-ACC-25, "Emergency Control Room A/C System Operation," does not direct the operators to close dampers ACC-3A or ACC-3B.

Upon being notified by the NRC of these concerns, additional analysis was performed which demonstrated the modification and procedure did not present an unreviewed safety question. This analysis was documented in a supplement to the original safety analysis for DCR 2373-2.

Due to the time that has elapsed since the modification was installed, a conclusive cause could not be determined. The investigation into this violation did identify the following as the two most likely causes:

1. During the design of the modification, organizational changes required the project to be reassigned to a different engineer, resulting in a loss of continuity in the project.
2. The method used to perform design changes was not conducive to continuity or communications between the design change group and plant groups.

During the design phase of this DCR, the responsible engineer was assigned to a different department. As a result, the project was reassigned to a different engineer. The major focus of the design change was on the electrical aspects of removal of the interlock and not the functional performance of the system. Both engineers remember talking about the need to address the possibility of outside air bypassing the filters during the transition phase of the project. However, a review of the design package found no evidence that the issue was ever resolved. Therefore, it appears that this concern was lost in the transition. In this time period, DCRs were performed using Kewaunee engineering resources as project managers dependent upon contract engineers for technical support. One project manager would be responsible for several projects. Furthermore, once a preliminary design was approved, communications between the project manager and plant groups affected by the change decreased significantly until the design was ready for installation.

To address concerns similar to the one cited in the inspection report, Kewaunee reorganized its engineering department in October 1991 and has added significant resources to provide in-house engineering expertise. The project manager now works with an in-house design team throughout the project. The team consists of the project manager, design engineering, and the affected departments. This typically includes multi-disciplined engineering, operations, and maintenance personnel. The team approach to design changes adds continuity to the design process and improves communication between work groups. As a result, when changes are made to the USAR or other documents, they are more likely to receive a thorough review.

In addition to the corrective actions already taken, the USAR will be revised to reflect how the system is described in operating procedure E-ACC-25. The annual update to the USAR is currently scheduled to be submitted to the NRC in November 1994. Furthermore, DCR 2373-2 will be used as a case study in the refresher training on the performance of safety evaluations. The training is tentatively scheduled to occur during the first quarter of 1994. The training will be provided to members of the engineering staff that are typically responsible for performing safety evaluations.

ATTACHMENT 2

to the Letter

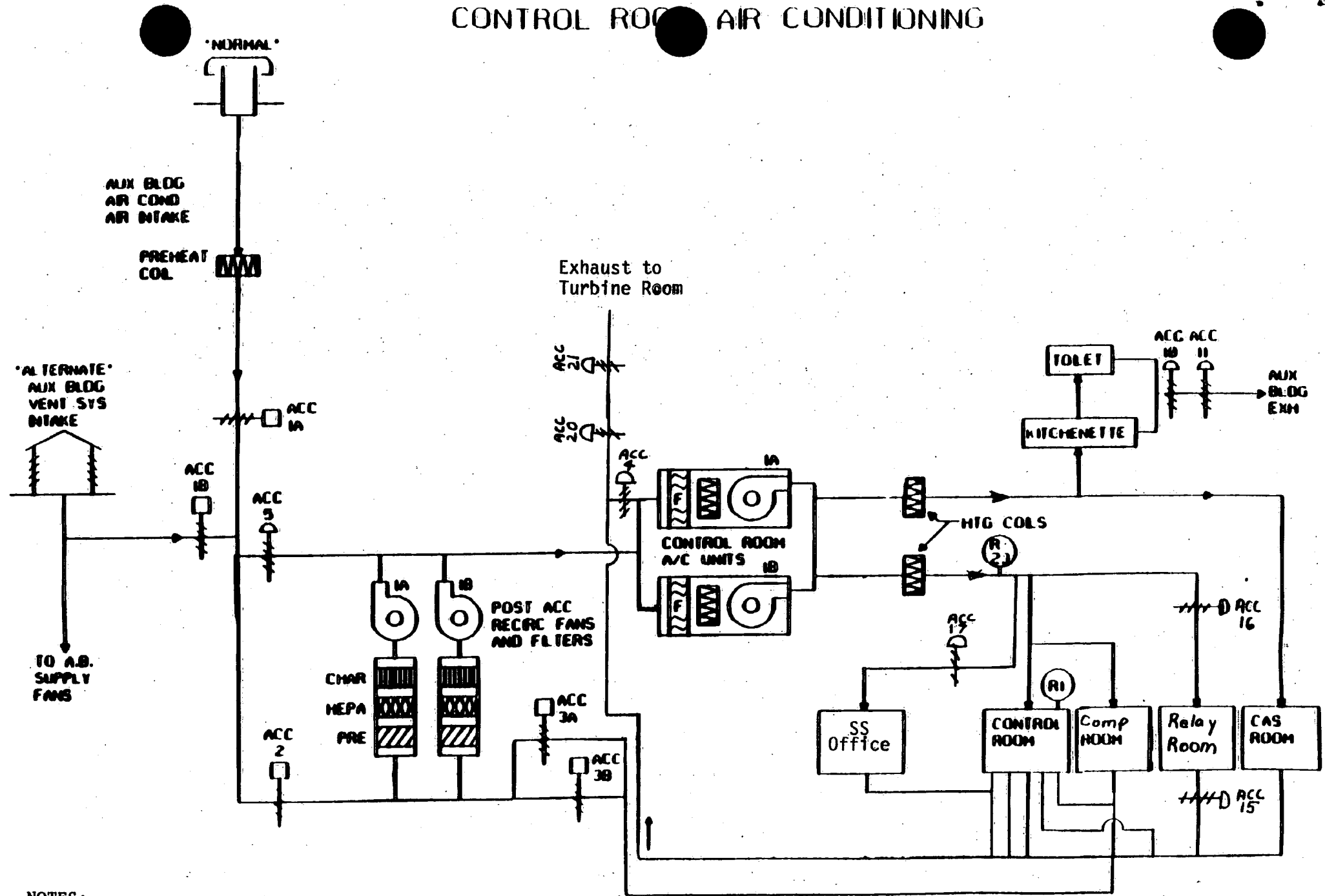
From: C.A. Schrock (WPSC)

To: Document Control Desk (NRC)

Dated: October 1, 1993

Re: Inspection Report 93-012

CONTROL ROOM AIR CONDITIONING



NOTES:

1. For Information Only
2. Refer to DWG Operation M-603