

# CATEGORY 1

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 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service      05000305  
 AUTH. NAME      AUTHOR AFFILIATION  
 HUJET, K.P.      Wisconsin Public Service Corp.  
 MARCHI, M.L.      Wisconsin Public Service Corp.  
 RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: LER 96-008-00: on 961030, remote position indication was not performed for four valves during surveillance interval. Caused by inadequate procedure review. Verified each valve in SP87-274.W/961127 ltr.

DISTRIBUTION CODE: IE22T      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5  
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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NRC-96-131

November 27, 1996

10 CFR 50.73

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

Ladies/Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Reportable Occurrence 96-008-00

In accordance with the requirements of 10 CFR 50.73, "Licensee Event Report System," the attached Licensee Event Report (LER) for reportable occurrence 96-008-00 is being submitted.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. L. Marchi".

M. L. Marchi  
Manager - Nuclear Business Group

KPH/jmf

Attach.

cc - INPO Records Center  
US NRC Senior Resident Inspector  
US NRC, Region III

9612040061 961127  
PDR ADOCK 05000305  
S PDR

030095

**LICENSEE EVENT REPORT (LER)**

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) <b>Kewaunee Nuclear Power Plant</b>	DOCKET NUMBER (2) <b>05000 305</b>	PAGE (3) <b>1 OF 4</b>
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TITLE (4) **Remote Position Indication Verification Not Performed for Four Valves During Surveillance Interval**

EVENT DATE (5)			LER NUMBER (6)			REPORT NUMBER (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
10	30	96	96	008	00	11	27	96		05000
										05000

OPERATING MODE (9) <b>E</b>	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) <b>0</b>	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
	20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER
	20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	(Specify in Abstract below and in Text, NRC Form 366A)
	20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
	20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME <b>Kevin P. Hujet - Shift Technical Advisor</b>	TELEPHONE NUMBER (include Area Code) <b>(414) 388-2560</b>
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO				

**ABSTRACT** (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On October 30, 1996, with the plant in refueling shutdown, Surveillance Procedure (SP) 87-274, "Biennial Validation of MOV Position Indication Operation," was being performed. The performance of SP87-274 fulfills the requirements of the Inservice Testing (IST) Plan for valve position verification as delineated in Section 4.1, "Valve Position Verification," of OM-Part 10, "Inservice Testing of Valves in Light-Water Reactor Power Plants."

During the performance of SP87-274, it was determined that the surveillance period had been exceeded for four valves in the IST Plan, RHR-1A, RHR-300A, RHR-300B, and CVC-440. These valves were declared out of service until adequate testing could be performed.

The cause of this event was determined to be the methodology used in the procedure along with inadequate procedure review.

Each valve in SP87-274 will be verified to indicate properly during the current refueling outage to ensure the two year frequency is not exceeded prior to the next scheduled refueling outage. SP87-274 will be revised to remove the potential for this event to occur again.

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Kewaunee Nuclear Power Plant	DOCKET NUMBER (2)  05000305	LER NUMBER (8)			PAGE (3)  2 OF 4
		YEAR  96	SEQUENTIAL NUMBER  - 008 -	REVISION NUMBER  00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Description of Event

On October 30, 1996, with the plant in refueling shutdown, Surveillance Procedure (SP) 87-274, "Biennial Validation of MOV Position Indication Operation," was being performed. The performance of SP87-274 fulfills the requirements of the Inservice Testing (IST) Plan for valve position verification as delineated in Section 4.1, "Valve Position Verification," of OM-Part 10, "Inservice Testing of Valves in Light-Water Reactor Power Plants."

During the performance of the procedure, it was determined that four valves in the IST Plan exceeded the surveillance period for valve position verification. The four valves [20] were declared out of service until satisfactorily tested. The four valves are:

- RHR-1A      RCS loop A supply to Residual Heat Removal [BP] pump A
- RHR-300A    Residual Heat Removal pump A supply to Safety Injection [BQ] pump A
- RHR-300B    Residual Heat Removal pump B supply to Safety Injection pump B
- CVC-440      Emergency boration from the boric acid storage tanks to the Chemical Volume and Control [CB] charging pumps suction

Remote position indication for RHR-1A was satisfactorily tested on 10/31/96. Remote position indications for RHR-300A, RHR-300B, and CVC-440 were not tested at the same time as RHR-1A because they were not required to be operable for the current plant conditions. Remote position indications for CVC-440, RHR-300A, and RHR-300B were tested satisfactorily on 11/4/96, 11/13/96, and 11/14/96, respectively.

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Kewaunee Nuclear Power Plant	05000305	96	- 008 -	00	3 OF 4

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Cause of the Event

The methodology of the procedure along with inadequate procedure review was determined to be the cause of the event. The method used in the procedure was to ensure that the preventative maintenance procedure (PMP) for the associated valve had been performed within the last two years. Included in the PMP are actions to ensure that the remote position indication corresponds to actual valve position. This method was acceptable in the past because the PMP frequency was once every two years which corresponded to every other annual refueling outage. The frequency of the PMPs was recently changed due to PMP optimization as well as to correspond with KNPP's extended operating cycles without reviewing the ramifications on SP87-274. This change in PMP frequency resulted in the two year remote position indication validation requirement being exceeded.

Analysis of the Event

Remote valve position indication does not affect the operation of the valves; however, it does support the surveillance testing performed to ensure operability of the valves. A review of past surveillance determined consistent operation of the valves and no reason to expect any malfunctions of the valves. In addition, since the remote position indications operated satisfactorily, there was no increased risk to the health and safety of the public. Failure to perform the surveillance in the time required violated Technical Specification 4.2.a.2; therefore, this event is being reported in accordance with 10CFR50.73(a)(2)(I)(B).

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

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		96	- 008 -	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

**Corrective Actions**

1. All of the valves in SP87-274 will have their remote positions verified during the current refueling outage.
2. SP87-274 will be revised to stroke test each of the valves with a local operator posted at the valve to observe proper operation and remote position indication on a refueling outage frequency. This action will ensure that the two year frequency is not exceeded in the future. This method of testing remote position indication is currently used for air operated valves.

**Additional Information:** None

**Equipment Failures:** None

**Similar Events:** None