

WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

September 1, 1982

Mr. R. L. Spessard, Director
 Division of Project and Resident Programs
 U. S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Dear Mr. Spessard:

Docket 50-305
 Operating License DPR-43
 IE Inspection Report No. 50-305/82-10

The subject report was issued following a routine inspection conducted by Mr. R. L. Nelson on June 1-30, 1982, of activities at the Kewaunee Nuclear Power Plant. One item was identified as non-compliance and cited by this report. The attachment to this letter provides our response to this item.

Very truly yours,

C. W. Giesler
 Vice President - Nuclear Power

js

Attach.

cc - Mr. Robert Nelson, U.S. NRC

Subscribed and Sworn to
 Before Me This 1st Day
 of September 1982

Notary Public, State of Wisconsin

My Commission Expires:
March 24, 1985

Mr. R. L. Spessard
September 1, 1982

ATTACHMENT

Response to IE Inspection Report 82-10

Item of Non-Compliance

Technical Specification 6.8.1 states, "Written Procedures and administrative policies shall be established, implemented and maintained that meet the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972." ... " Administrative Control Directive 5.4 (Work Request), Section 5.4, states, in part, "The maintenance or I&C Group Supervisor plans when the maintenance action is to be done noting priority, completion required date, and collating in order of importance."

Contrary to the above, neither the maintenance nor I&C Group Supervisor planned maintenance action on a Maintenance Work Request concerning heat tracing on a boric acid flow path in that they failed to note the priority and completion required date and collate in order of importance. The MWR was in effect throughout the 42-day maintenance outage. This lack of planning resulted in the plant entering into a Technical Specification Limiting Condition for Operation upon return to operation from the outage.

Response:

The Maintenance Work Request (MWR) was written because of continual low alarms from the trends can monitor point, not because of an actual failure observed with the boric acid heat tracing circuits. At the time the MWR was written applicability of the trends can monitor alarm was questionable as evidenced by several such Work Requests that were generated on

the alarm circuits. Questionable applicability is due to the fact that trends can monitor points come off different thermocouples than the temperature controlling monitor points. Thus, the thermocouple monitoring any particular circuit may be located in a colder region of piping than the control point and may continually give low alarms as the control circuitry oscillates through its control band. When a situation like this is discovered, corrective action is taken to relocate the controlling monitor point to the colder portion of the affected pipe, whenever it is practicable to do so. At the time the MWR was written controller operation and trends can points were checked and verified operable. The MWR was set aside because it was determined that the trends can monitoring point and the heat tracing circuit control point were not properly placed. Relocation of the thermocouples requires taking the circuitry and process line completely out of service. Since the plant was operating at the time and a shutdown was required to work on the circuit in question, the MWR was set aside for refueling. As mentioned in the non-compliance, through an oversight this MWR was not completed during the refueling outage and a subsequent failure of one train of heat tracing in that circuitry caused a loss of one path of Boric Acid to the reactor.

Investigation revealed that the boric acid line freeze-up upon return to power operation from the outage was caused by a failure of one train of heat tracing tape combined with the removal of some insulation on that section of line. Upon discovery, the affected section of piping was flushed out, and the old heat trace tape was replaced and tested in accordance with approved maintenance procedures.

Since the time that the MWR was written a design change has been completed on the trends can alarm inputs which has eliminated a large number of non-applicable alarms. In addition, a person from the maintenance group is responsible to note the priority, collate the MWR's associated with heat tracing in order of importance, and track completion of heat tracing MWR's.

Operability Check

For safety-related circuits, when a valid, non-explainable trends can low temperature alarm point is below 145^oF, or when a Train A failure alarm is received, the shift supervisors are instructed to perform the following:

- Write a Maintenance Work Request
- Call in an electrician to perform a current reading on both Train A and B circuits to ensure operability
- Monitor heat tracing circuit temperatures to ensure that Train B is operating per design

In the event of a train failure, the inoperable train must be returned to service within 48 hours as per T.S. 3.2.c.3.

If a low temperature alarm is received and no failures are found:

- Current readings will be taken every 48 hours to ensure both trains operable until the problem has been corrected and the temperature returns to above 145^oF.

These actions are currently in place at the Kewaunee Plant.