

WISCONSIN PUBLIC SERVICE CORPORATION



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

March 3, 1983

Mr. J. F. Streeter, Chief
Projects Branch 2
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Streeter:

Docket 50-305
Operating License DPR-43
Inspection Report 50-305/82-21

The subject report was issued following a routine safety inspection by Mr. R. L. Nelson, of your office, during the period of November 1 - December 31, 1982, of activities at the Kewaunee Nuclear Power Plant. One item of noncompliance was identified. Also, one item was identified as a deviation from commitments made in previous correspondence. Our response to these items follows.

Very truly yours,

A handwritten signature in cursive script that reads "E. R. Mathew".

C. W. Giesler *for*
Vice President - Nuclear Power

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Attach.

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

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ATTACHMENT

Response to IE Inspection Report 82-21 (DETP)

Noncompliance:

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." ANSI N18.7-1972, Section 5.1.2, states, in part, "Procedures shall be followed..." Administrative Control Directive 8.12, "Drawing Changes," Section 5.G, states, "An individual finding a drawing discrepancy should mark up the drawings and forward them to his supervisor. The supervisor should send the marked up drawings to the Technical Supervisor who will assign a responsible engineer/supervisor to review the change and initiate all changes as required."

Contrary to the above, the licensee was aware of a drawing discrepancy in drawing No. 237127A-M202, Rev. VV since March of 1982 and action to correct the discrepancy has not been initiated as of October 15, 1982.

Response:

The referenced drawing has been corrected; this revision received final plant review and approval for issue on February 8, 1983. Final issue, and microfilming, will be complete by April 1, 1983.

The drawing discrepancy was due to personnel error and oversight. Because of the newness of the drawing discrepancy administrative procedure and unfamiliarity with proper control mechanisms, the particular drawing discrepancy was not taken care of promptly.

A "tracking" sheet is now being used by the responsible supervisor to maintain a current status of drawing changes in progress. This, in conjunction with Administrative Control Directive 8.12, "Drawing Changes," should insure that drawing discrepancies are corrected promptly. We feel that these corrective actions should prevent future reoccurrences.

Deviation From Commitment:

The FSAR, Section 6.5.1, states in part, "The containment fan-coil service water discharge monitor checks the containment fan coils for radiation indicative of a leak from the containment atmosphere into the service water. A small bypass flow from each of the fan coils is mixed in a common header

and monitored by a scintillation detector mounted in a holdup tank assembly. Upon indication of a high radiation level each fan coil is individually sampled to determine which unit is leaking." To determine that a sample from each of the fan coils was being provided to the detector, a flow detector was installed on each of the bypass flow lines.

Contrary to the above, the flow measuring devices are and have been inoperable for greater than 12 months.

Response:

A design change had been issued to provide flow indication for the sample flow from the fan coil units. The original flow detector installed as the basis for the statement in the FSAR did not function properly due to continuous lake water debris clogging the detector. One other attempt to correct the problem also failed to provide adequate indication. Action on the design change had been temporarily stopped because available manpower was being used on higher priority design change items. Until pointed out by the Resident Inspector, it was not realized by the personnel assigned responsibility for the DCR that an FSAR commitment existed. As discussed with the Resident Inspector, the priority of this DCR has been upgraded and expected completion of the design change is July, 1983 dependent on material delivery and receipt.

As you are no doubt well aware, NRC regulations and policies are now being aimed at joint NRC/licensee schedules for design changes and plant upgrades. We have instituted a priority rating and planning program and are making continual improvements to that program to aid in setting proper priorities and schedules in order to better resolve past scheduling and deadline problems. We will in the future attempt to work more closely with our Resident Inspector and Project Manager to keep them aware of work loads, manpower and schedules, so as to ensure all safety concerns get proper prioritization. We further will attempt to inform them promptly of any slippage in scheduled implementation dates or commitments that can not be met. We feel that implementation of this program along with input from the Resident Inspector and Project Manager will eliminate future problems concerning deviation from commitments.