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At 1650 on July 28, 1984, the Differential Pressure Indicator (PDI) on the Spent Fuel Pool (DA) Demineralizer Post Filter (FLT) indicated high. An operator was sent out to isolate and drain the filter so that maintenance could be performed on it the following Monday, July 30. The operator opened the filter drain (DRN) to the Waste Holdup Tank (WH) and then failed to close valve (V) FPC-1100 which allowed a flow path between the Refueling Water Purification Pump (P) discharge and the filter.

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

The Refueling Water Purification Pump's normal function is to provide continuous mixing of the borated water in the Refueling Water Storage Tank (BQ). With FPC-1100 and the drain valve to the Waste Holdup Tank (FPC-290) open, the Refueling Water Purification Pump was taking a suction on the RWST and discharging to both the RWST and the Waste Holdup Tank.

At 2105, during his routine tour, the auxiliary operator discovered that the RWST bubbler level indicator (LI) had dropped below the 2.8 in• of water as required by Technical Specification 3.3.a.1.A. The total decrease in the RWST level was approximately 1½%. Upon investigation, valve FPC-1100 was found open and was closed immediately. At 2126 refilling operations from the Chemical Volume & Control System (CB) were started and an orderly shutdown was initiated. The required RWST level was reached at 2206 and the load backdown was stopped. The plant was returned to full power operation by 2238.

Technical Specification 3.3.a+1.A requires a minimum RWST volume of 272,500 gallons of borated water which corresponds to a level of 98% on the control room indication. Due to the fact that the control room gauge is accurate to only  $\pm 2\%$  and readings vary from operator to operator a slight decrease in tank level, as in this case, would not be detected in the control room. In 1979 a local, narrow range bubbler level system was installed on the RWST to monitor Technical Specification compliance. The bubbler level indicator is checked and recorded in the auxiliary building log by the operator on his routine tours.

This incident has been discussed with the operator involved, all the auxiliary operators, and trainees. In addition, a copy of the Incident Report has been routed to the Operations and Training group for their information. A memorandum clarifying equipment status control requirements for auxiliary building filters has been written by the Plant Operations Superintendent and circulated to operations personnel. This should prevent a recurrence of this type of event.

The RWST level was below the Technical Specification required level for a maximum time period of six hours, from the time the drain down started until the level was restored. The FSAR assumes a tank volume sufficient in the RWST to provide the following functions during a Design Basis Accident: 1) fill the reactor vessel above the nozzles, 2) provide enough borated water to prevent a return to criticality and 3) provide a sufficient volume of water on the containment floor to initiate recirculation. Even at the lowest level of the RWST during this six hour period, these functions would have been satisfied. Hence, this Technical Specification violation did not result in a threat to the public health and safety.

## WISCONSIN PUBLIC SERVICE CORPORATION



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

August 27, 1984

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

Gentlemen:

Docket 50-305 Operating License DPR-43 Kewaunee Nuclear Power Plant Reportable Occurrence 84-015-00

In accordance with the requirements of 10 CFR 50.73 "Licensee Event Report System", the attached Licensee Event Report for reportable occurrence 84-015-00 is being submitted.

Very truly yours,

SIKA

D. C. Hintz Manager - Nuclear Power

JGT/js

Attach.

cc - INPO Records Center Suite 1500, 1100 Circle 75 Parkway Atlanta, GA 30339 Mr. Robert Nelson, NRC Resident Inspector RR #1, Box 999, Kewaunee, WI 54216 Mr. S. A. Varga, Chief US NRC, Washington, DC 20555 Mr. J. G. Keppler, Regional Administrator Region III, US NRC, 799 Roosevelt Road Glen Ellyn, IL 60137