

Appendix

NOTICE OF VIOLATION

Wisconsin Public Service Corporation
Kewaunee Nuclear Power Plant

Docket No. 50-305
License No. DPR-43
EA 85-23

As a result of the inspection conducted on December 19, 1984 through January 15, 1985, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, as revised, 49 FR 8583 (March 8, 1984), and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended ("Act"), 42 U.S.C. 2282, PL 96-295, and 10 CFR 2.205, the following violations have been identified:

- A. Technical Specification 3.3 sets forth the operability requirements of the Safety Injection and Residual Heat Removal Systems when the reactor is critical. Technical Specification 3.3.a.1.G states, "Automatic valves, instrumentation, piping, and interlocks associated with the above components and required to function during accident and/or post-accident conditions are operable."

Contrary to the above, on December 18, 1984, the plant was critical and operated for approximately nine hours with an inoperable automatic interlock in the safety injection pump system, after surveillance test SP 35-147, Boric Acid Tank Level Instrument Test, was completed on the system.

This is a Severity Level III violation (Supplement I).

- B. 10 CFR Part 50, Appendix B, Criterion V states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Contrary to the above requirement, Surveillance Procedure No. 35-147, Revision J, "Boric Acid Tank Level Instrument Test," did not include an explicit signoff for the Control Operator to verify the correct position for the Boric Acid Tank selector switch and Administrative Control Directive No. 4.5, Revision R, "Shift Operation and Turnover," did not specify a specific check to verify that the Boric Acid Tank had been properly aligned to assure compliance with the operability requirements set forth in Technical Specification 3.3.

This is a Severity Level IV violation (Supplement I).

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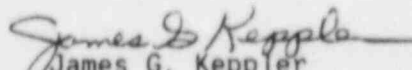
- C. 10 CFR 50.72(b)(2) states in part, "...the licensee shall notify the NRC as soon as practical and in all cases within four hours of the occurrence of any of the following: ... (iii) Any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to: ... (D) Mitigate the consequences of an accident."

Contrary to the above requirement, the condition of the boric acid storage tank selector switch which caused the automatic interlock to be inoperable was not reported to the NRC until approximately 17 hours after being identified by the licensee.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation addressing each alleged violation and including: (1) admission or denial of the alleged violation; (2) the reasons for the violation if admitted; (3) the corrective steps which have been taken and the results achieved; (4) the corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

FOR THE NUCLEAR REGULATORY COMMISSION


James G. Keppler
Regional Administrator

Dated at Glen Ellyn, Illinois
this 15th day of March 1985.