

WISCONSIN PUBLIC SERVICE CORPORATION

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



December 21, 1984

Mr. William S. Little
 Chief, Operations Branch
 Region III
 U.S. Nuclear Regulatory Commission
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Dear Mr. Little:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
 Inspection Report No. 50-305/84-19 (DRS)

On December 3, 1984 WPSC received a Notice of Violation (level IV) concerning 10 CFR 50, Appendix J leakage testing during the 1984 refueling outage. Attached to this letter is WPSC's response to the Notice of Violation.

It is important to note, however, that the containment integrated leakage rate determined in the 1984 Type A test was 0.016 wt%/day, 96% less than the acceptance criterion. This demonstrates the continued reliability of the Kewaunee Containment for Equilibrium Cycle X.

Very truly yours,

D. C. Hintz
 Manager - Nuclear Power

GWH/js
 Attach.

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

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Attachment to Letter

From

D. C. Hintz to W. S. Little

December 21, 1984

On December 3, 1984 WPSC received a Notice of Violation, Level IV, for non-compliance with 10 CFR 50, Appendix J during Kewaunee's 1984 refueling outage. Specifically, WPSC performed Type B and C tests prior to performing the Type A test and did not add the pre- and post-repair differential leakage to calculate the as-found leakage of containment. Subsequent to the exit interview where WPSC was notified of the noncompliance the following corrective actions have been taken:

- a. Corporate licensing and plant technical personnel responsible for performance of the Appendix J testing have been informed of the NRC's interpretation of adding a conservative measure of leakage repaired prior to but during the same outage as a Type-A test.
- b. The file of the 1984 Type-A surveillance procedure (SP56-088) has been updated to include the difference in pre- and post-repair local leak rate measurements. A Type-A test failure has been acknowledged in this update.

The following corrective action will be taken to avoid further noncompliance:

- a. Proposed Technical Specification Amendment Numbers 52, 52A, and 52B are undergoing review by WPSC personnel to achieve compliance with 10 CFR 50, Appendix J, and the Safety Evaluation Report (dated September 30, 1982) granting certain exemptions to WPSC from Appendix J.
- b. The surveillance procedure for the Integrated Leak Rate Test will be revised to include a conservative measure of pre- and post-repair differential leakage determined prior to the Type-A test but during the same refueling outage.

Full compliance with the above items will be achieved when:

- a. By February 1, 1984 WPSC will submit any changes to Proposed Amendment 52, 52A, and 52B necessary to prevent reoccurrence of this noncompliance.
- b. Also by February 1, 1984, WPSC will submit a supplement to the 1984 ILRT report for Kewaunee (originally submitted August 20, 1984) including a calculation of the 1984 'as-found' leakage for Kewaunee's containment.
- c. Revisions to the Type-A test procedure will be in place prior to the next ILRT, projected for 1987.