

WISCONSIN PUBLIC SERVICE CORPORATION



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

July 22, 1983

Mr. C. E. Norelius
Division of Project and
Resident Programs
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Norelius:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
IE Inspection Report 83-04 (DPRP)

The attachment to this letter details our response to the two items of non-compliance identified in inspection report 83-04 (DPRP). Since items 1 and 2 were the result of one incident and the corrective actions are the same, our response to the two items has been combined in the attachments.

Very truly yours,

A handwritten signature in cursive script, reading "C. W. Giesler".

C. W. Giesler
Vice President - Nuclear Power

js

Attach.

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

JUL 25 1983

ATTACHMENT 1

Response to Items of Noncompliance IE Inspection Report No. 83-04 (DPRP)

Appendix A of IE Inspection Report No. 83-04 (DPRP) identified two items of noncompliance. The following responds to those items:

Item 1

Technical Specification 3.1.d.5, states, "When the reactor is critical and above 2% power, two reactor coolant leak detections systems of different operating principles shall be in operation with one of the two systems sensitive to radioactivity. Either system may be out of operation for up to 12 hours provided at least one system is operable".

Contrary to the above, the sampling path from the containment to the system sensitive to radioactivity was isolated from 2:45 pm, March 7, 1983, until 7:50 am, March 8, 1983, a period of 17 hours.

Item 2

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 5.3 states, in part, "Nuclear power plants shall be operated in accordance with written procedures."

Administrative Control Directive 4.2, "Operating Procedures", Section 5.5.1, states, in part, "Each shift supervisor shall ensure that during his assigned shift all operation of plant systems are conducted in accordance with the applicable currently approved operating procedure".

Operating procedure N-RBV-18B, "Reactor Building Vent System Cold Operation and Making Releases", Section 4.8, states, in part, "Final shutdown from both modes, return RM-11 and 12 from Vent position to Containment position".

Contrary to the above, RM-11 and 12 were not returned to the Containment position when shutting down from making a release on March 7, 1983. Failure to ensure that the sampling point for RMS channels R-11 and R-12 were returned from the vent position to the containment position following the completion of containment venting, resulted in a Limiting Condition for Operation being exceeded.

ATTACHMENT 1 (cont.)

Response

Wisconsin Public Service accepts the violations as described. Upon discovery our immediate action was to return RM-11/12 to the containment sampling position. Corrective actions taken to prevent recurrence include: 1) having each Shift Supervisor review the event with his crew emphasizing the importance of adherence to written procedures and the need to be more attentive to control board indications, 2) changing the cover on the vent position indicating lamp from amber to red to make the abnormal condition more easily recognizable, 3) revising Operating Procedure N-RBV-18B to more clearly detail the procedural steps performed during containment venting, and 4) revising Surveillance Procedure SP 32B-116 to include operator check off and initialing to verify R-11/12 has been returned to the containment sampling position; this is then reviewed by the Shift Supervisor.

WPS considers it significant that this event was discovered by the Operations Supervisor as part of a Control Room walkdown. This supervisory position was recently created and filled by a former Shift Supervisor to provide plant operations with additional depth and daily continuity. Particular emphasis is placed on a review of plant operations, especially those affecting safety related equipment.

WPS considers these actions to have placed us in full compliance with technical specifications and sufficient to prevent recurrence.