

## WISCONSIN PUBLIC SERVICE CORPORATION



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

March 4, 1983

Mr. J. G. Keppler, Regional Administrator  
Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Keppler:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
IE Bulletin 83-01: Failure of Reactor Trip Breakers  
Westinghouse DB-50 to Open on Automatic Trip Signal

The following discussion provides our 7-day written reply addressing the concerns of each "action item" in accordance with the requirements of IE Bulletin 83-01. The numbering is consistent with that of the bulletin "action item."

Item 1

Perform surveillance test of undervoltage trip function independent of the shunt trip within 24 hours of receipt of this Bulletin unless equivalent testing has been performed within 5 days. Those plants for which on-line testability is not provided may complete this item before resuming operation or if currently operating, at the next plant shut-down.

Response

The referenced bulletin was received via telecopy on Friday, February 25, 1983. Surveillance testing of the undervoltage trip function was initiated and completed per SP 47-062 on Saturday, February 26, 1983. This procedure opens the reactor trip breakers independent of the shunt trip and is performed monthly at power. No problems were encountered in performing this procedure.

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Item 2

Review the maintenance program for conformance to recommended W program (attachment) including frequency and lubricant applied to trip mechanism. Verify actual implementation of the W program. If maintenance including lubrication does not conform, initiate such maintenance within 5 days of receipt of this bulletin or provide an alternate maintenance program. Repeat the testing required in item 1 prior to declaring the breaker OPERABLE.

Response

The preventative maintenance program for the reactor trip breakers was reviewed for conformance to the recommended Westinghouse program. Annual maintenance is performed in accordance with preventative maintenance procedure PMP 47-1. This procedure requires testing of the breaker operation, observing freedom of mechanism movement, cleaning and lubrication. The lubricant specified in the procedure is not the same as recommended in the Westinghouse data letter attached to the bulletin, as the specified lubricant is no longer available commercially. We have contacted Westinghouse and will revise the PMP to include the currently recommended lubricant, Molykote C-40.

PMP 47-1 has been in place and performed annually since plant startup. We have observed no failures of the reactor trip breakers to perform their intended function. Documentation of preventative maintenance records are maintained in the QA vault at the plant. Since the annual maintenance frequency has shown to be adequate to maintain the reactor trip breakers, we feel we conform to the recommended Westinghouse program. The next scheduled preventative maintenance on the reactor trip breakers will be performed during the next refueling outage scheduled to start March 19, 1983.

Item 3

Notify all licensed operators of the failure-to-trip event which occurred at Salem. Review the appropriate emergency operating procedures for the event of failure-to-trip with each operator upon his arrival on-shift.

Response

The licensed operators were informed of the Salem event as they assumed shift responsibilities. The Kewaunee Nuclear Power Plant specific Emergency Operating Procedures for failure to trip events were reviewed by the operators. In addition, the information contained in the IE Bulletin and this response will be provided to the training department for incorporation in the retraining program.

Mr. J. G. Keppler  
March 4, 1983  
Page 3

Item 4d

You are reminded of the requirements for prompt notification in accordance with 10 CFR 50.72 in the event of detecting an inoperable RPS breaker.

Response

Plant management personnel are aware of the requirement to report events of this nature in accordance with 10 CFR 50.72.

Very truly yours,

*CR Luoma for*

C. W. Giesler  
Vice President - Nuclear Power

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cc - Mr. R. L. Nelson, U.S. NRC Resident Inspector  
Mr. S. A. Varga, U.S. NRC  
Document Control Desk  
Director, Office of Inspection & Enforcement, US NRC

Subscribed and Sworn to  
Before Me This 4th Day  
of March 1983

*Susan N. Ford*  
\_\_\_\_\_  
Notary Public, State of Wisconsin

My Commission Expires:  
March 24, 1985