

## WISCONSIN PUBLIC SERVICE CORPORATION



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

February 3, 1984

Mr. W. D. Shafer, Chief  
Projects Branch 2  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Shafer:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Inspection Report 50-305/83-15

The attachment to this letter provides our response to the Notice of Violation appended to the Referenced Inspection Report.

Very Truly Yours,

*Charles A. Schrock for*

C. W. Giesler  
Vice President - Nuclear Power

CAS/js

Attach.

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

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ATTACHMENTRESPONSE TO NOTICE OF VIOLATION  
IE INSPECTION REPORT NO. 50-305/83-15(DPRP)VIOLATION:

Technical Specification 6.8.1 states, "Written procedures and administrative policies shall be established, implemented and maintained that meet the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972". ANSI N18.7-1972, Section 5.1.5, states, in part, "Procedures shall be provided for control of equipment as necessary, to maintain reactor and personnel safety and to avoid unauthorized operation of equipment. These procedures shall require control measures such as locking or tagging to secure and identify equipment in a controlled status". Administrative Control Directive 4.3 "Tagout Control" Section 3.0 states, in part, "Danger Cards shall be used to protect equipment or to warn of unusual or dangerous conditions".

Contrary to the above, on September 28, 1983, authorization was granted to isolate the 1B boric acid transfer pump, and maintenance personnel were permitted to replace the pump's discharge pressure gauge isolation valve without the use of equipment control measures as required by ANSI N18.7-1972 and Administrative Control Directive 4.3.

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

RESPONSE:

Wisconsin Public Service acknowledges the violation as described.

Administrative Control Directive (ACD) changes have been initiated which will clarify and define the tagging of equipment in a controlled status. This revision requires the placing of a tag on the appropriate control room device (e.g., switch, etc.) for all equipment which is out of service. The tag will also state the reason the equipment is out of service.

The revision will be completed and the administrative changes implemented by February 13, 1984.

This clarification, in conjunction with current plant procedures and policies, should preclude the recurrence of this type of event.

VIOLATION:

Technical Specification 6.9.2.b states, in part, "The reportable occurrence discussed below shall be the subject of written reports to the Director of the appropriate Regional Office within thirty days of occurrence of the event". Technical Specification 6.9.2.b(2) states, "Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation." Technical Specification 3.0 "Limiting Condition For Operation" states in Specification 3.2.c.2, "ONE boric acid transfer pump may be out of service provided both pumps are again operable within 24 hours."

Contrary to the above, while the plant was operating at power on September 28, 1983, the plant was in a limiting condition for operation when the 1B boric acid transfer pump was placed out of service for a period of approximately six hours. This condition of operating in a degraded mode was not reported as required by Technical Specifications 6.9.2.b and 6.9.2.b.(2).

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

RESPONSE:

Wisconsin Public Service acknowledges the violation as described.

Shift Supervisors and Shift Technical Advisors have received guidance regarding reporting requirements pursuant to Kewaunee Plant Technical Specifications, 10 CFR 50.72, and 10 CFR 73.71. A review of event documentation (Incident Reports) substantiates an increased awareness of these reporting requirements.

With the January, 1984 LER rule change, this type of event (entry into a limiting condition of operation) is no longer reportable.

In order to ensure compliance with the January, 1984 LER rule change and the associated reporting requirements, Shift Supervisors and Shift Technical Advisors were given special training in which they were provided both written and verbal guidance on 10 CFR 50.72, 10 CFR 50.73, and 10 CFR 73.71 as they apply to Kewaunee Nuclear Power Plant.

VIOLATION:

Technical Specification 6.8.1 states, "Written procedures and administrative policies shall be established, implemented and maintained that meet the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972." ANSI N18.7-1972, Section 5.1.2, states in part, "Procedures shall be followed.." Administrative Control Directive (ACD) 5.4, Revision I, "Work Request", states, "This ACD establishes the method of identifying, controlling and establishing requirements for the documenting of corrective maintenance actions performed on plant equipment". The ACD requires that the Maintenance Work Request (MWR) form provide documentation including; component identification, applicability of post-maintenance testing, and a complete description of maintenance, performed.

Contrary to the above, after MWR No. 24052 had been processed through the Maintenance Coordinator's review it did not provide documentation as required by ACD 5.4.

This is a Severity Level V noncompliance (Supplement I).

RESPONSE:

Wisconsin Public Service acknowledges the violation as described.

Meetings of Plant Supervisory Staff have been held to acknowledge and identify these deficiencies. Follow-up meetings with general plant staff addressed, and reemphasized, each individual's responsibility to provide complete work activity documentation. Those persons performing specific reviews have been directed to provide complete work activity documentation at the time of their sign off.

Interim corrective action will be the revision of ACD 5.4 ("Work Request") to provide for more definitive delineation of responsibilities. This ACD will be revised and implemented prior to the start of the 1984 Refueling Outage (March 16, 1984).

In order to identify and implement a long term resolution, selected plant staff have been designated to identify procedural and administrative deficiencies related to Maintenance Work Requests and propose corrective actions as necessary.

To date, final long term corrective actions have yet to be determined.