

LICENSEE EVENT REPORT

CONTINUED BLOCK

(PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

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 LICENSEE LOG# 14 15 LICENSE NUMBER 25 26 LICENSE TYPE 30 37 CAT 58

REPORT SOURCE L 0 5 0 0 0 3 0 5 7 1 2 1 0 8 3 8 0 1 0 9 8 4 9
 DOCKET NUMBER 68 69 EVENT DATE 74 75 REPORT DATE 80

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES

With the reactor at 100% power operation, all rods out and in manual, the operators noticed that all RPI was gradually drifting downwards. The common drifting of all RPI was due to a voltage regulator failure, thus the RPI system was at no time declared inoperable. Based on excore indications, which remained normal the entire time, and no change in bank demand position, there was no rod misalignment. Because of the potential safety significance involved we feel this incident is worthy of a 30 day report. See attachment.

SYSTEM CODE I F 11 CAUSE CODE E 12 CAUSE SUBCODE F 13 COMPONENT CODE INSTRU 14 COMP SUBCODE P 15 VALVE SUBCODE Z 16
 EVENT YEAR 8 3 SEQUENTIAL REPORT NO. 0 3 5 OCCURRENCE CODE 0 3 REPORT TYPE L REVISION NO. 0
 ACTION TAKEN E 18 FUTURE ACTION A 19 EFFECT ON PLANT Z 20 SHUTDOWN METHOD Z 21 HOURS 0 0 0 0 ATTACHMENT SUBMITTED Y 23 NRPD 4 FORM SUB. Y 24 PRIME COMP. SUPPLIER N 25 COMPONENT MANUFACTURER W 1 2 0

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS

Drifting RPI was because the contact point in the voltage regulator was tarnished over due to age and wear causing a lower output voltage. The voltage adjust pot was wiped through the bad spot, the voltage readjusted, and all RPI returned to normal. Long term actions include adding the output voltage readings to the annual surveillance test and replacing the power supply once a new one can be purchased. No further action is required at this time.

FACILITY STATUS E 28 % POWER 1 0 0 0 29 OTHER STATUS NA 30 METHOD OF DISCOVERY A 31 DISCOVERY DESCRIPTION Operator Observation 32
 ACTIVITY CONTENT RELEASED OF RELEASE Z 33 Z 34 NA 35 AMOUNT OF ACTIVITY NA 36 LOCATION OF RELEASE

PERSONNEL EXPOSURES NUMBER 0 0 0 37 TYPE Z 38 DESCRIPTION NA 39

PERSONNEL INJURIES NUMBER 0 0 0 40 DESCRIPTION NA 41

LOGS OF ONI DAMAGE TO FACILITY TYPE Z 42 DESCRIPTION NA 43

PUBLICLY ISSUED DESCRIPTION NA 44

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 PDR ADOCK 05000305
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NRC USE ONLY

M. L. Marchi/C. A. Schrock

PHONE 414 381-2560

January 9, 1984

Docket 50-305 LER 83-035/03L-0

Kewaunee Nuclear Power Plant

ATTACHMENT TO LER 83-035

10) EVENT DESCRIPTION AND PROBABLE CONSEQUENCES:

With the reactor at 100% power, all rods out and in manual, the operators noticed at approximately 0320 (Central Standard Time) that all rod position was gradually drifting downward. The rod position indication was oscillating approximately 12 steps from the respective bank demand position.

The objective of TS 3.10 is to ensure: 1) the core remains subcritical after reactor trip; 2) acceptable core power distributions; and 3) limited potential reactivity insertions caused by a hypothetical rod ejection accident. Based on excore indications, which remained normal the entire time, and no change in bank demand position, there was no misalignment. Due to the plant conditions, and to best meet the intent of TS 3.10, the Shift Supervisor, STA, and plant management felt it would not be prudent to change power level or plant operating mode while investigation and eventual corrective action was being taken to restore stable voltage to the RPI system.

This event and the evaluations performed that were related to it have identified a potential safety concern related to the Technical Specifications. Our Technical Specifications (which are similar to the Standard Technical Specifications) contain explicit requirements regarding rod misalignment and rod position indication system operability. Failure to comply with these specifications requires action to reduce power or shutdown the plant. The potential safety concern is that rod motion during a time when the indication system is suspect could lead to plant conditions worse than the conditions at the start of the event.

We have noted in the past that we feel prescriptive requirements related to rod misalignment technical specifications are inappropriate because other technical specifications (such as peaking factor and quadrant power tilt limits) provide reasonable assurance that the reactor physics parameters are maintained well within safe limits. As such, we feel that rod misalignment requirements, should at a minimum, contain flexibility to allow for evaluation of the circumstances and identification of a proper cause of action.

We are aware that the NRC is concerned about the appropriateness of technical specifications. Your interest in this is exemplified in the advanced notice of proposed rulemaking which suggested a redefinition of technical specifications (45FR45916, published 7/8/80) and more recently, in NUREG-1024, Technical Specifications -- Enhancing the Safety Impact. The Task Group on Technical Specifications, which was responsible for NUREG-1024, may be interested in the rod misalignment technical specifications as an example of specification which could be considered as a "supplemental specification", or perhaps, which should be re-evaluated to assure that overall plant safety is maintained under normal and off-normal conditions.

WISCONSIN PUBLIC SERVICE CORPORATION



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

January 9, 1984

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
Reportable Occurrence 83-035/03L-0

In accordance with the requirements of the Technical Specifications, Section 6.9, the attached Licensee Event Report for reportable occurrence 83-035/03L-0 is being submitted.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. W. Giesler".

C. W. Giesler
Vice President - Nuclear Power

JGT/js

Attach.

cc - Dir, Office of Inspection & Enforcement
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Dir, Office of Mgt Info & Program Control
US NRC, Washington, DC 20555
INPO Records Center
Suite 1500, 1100 Circle 75 Parkway
Atlanta, GA 30339
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US NRC, Washington, DC 20555

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