

WISCONSIN PUBLIC SERVICE CORPORATION



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

June 1, 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
IE Inspection Report 50-305/84-02

The attachment to this letter provides our response to the item of noncompliance identified in Inspection Report 84-02 (DPRP).

Very truly yours,

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

Carl W. Giesler
Vice President - Power Production

JPG/js

Attachment

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

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ATTACHMENTResponse to Item of Noncompliance
IE Inspection Report No. 50-305/84-02 (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 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."

Surveillance Procedure (SP) 08-185, "Charcoal Filter Heat Detector Test", Section 6.1, states, "Have operations place the following items in the indicated position and tag, for each unit to be isolated. Remove only one system from service at a time."

Contrary to the above, on March 13, 1984, maintenance personnel requested that Shield Building Ventilation (SBV) train "B" be removed from service and tagged for performance of SP 08-185. Following the release of SBV train "B" for testing, the maintenance personnel performed SP 08-185 testing on train "A". Performance of specific steps of the SP will place the unit being tested out of service. Performance of the above actions resulted in both trains of the SBVS being out of service for approximately one hour, contrary to the procedural requirements of SP 08-185.

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

Response:

Wisconsin Public Service acknowledges the violation in that the maintenance was performed on the wrong train of the Shield Building Vent System (SBVS) in violation of Surveillance Procedure (SP) 08-185, "Charcoal Filter Heat Detector Test".

At the time of this incident, it was believed that the above mentioned actions resulted in both trains of the SBVS being out of service. Later analysis determined that train "B" was only partially removed from service for the surveillance. It is our belief that the portion of train "B" which remained in service was capable of performing the intended safeguards function.

In an effort to correct any conditions which may have contributed to this incident, several actions have been or are being taken:

1. The significance of the event was discussed with the personnel involved;
2. The filter housings have been more clearly marked for easier identification;
3. Surveillance Procedure (SP) 08-185, "Charcoal Filter Heat Detector Test", will be revised to include a separate section or procedure for each component; and
4. Provisions will be made for independent verification of certain steps in the procedures. This includes steps which change the position of the deluge system isolation or drain valves, and steps which reset alarms in the Control Room or on the Pyr-A-Larm Control Unit Panel.

WPSC expects to have these changes completed by August 1, 1984.