

## WISCONSIN PUBLIC SERVICE CORPORATION

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



February 15, 1985

Mr. William S. Little  
Chief, Operations Branch  
Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Little:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
IE Inspection Report #84-15 Fire Protection

Reference: 1) Letter from W. S. Little (NRC) to D. C. Hintz (WPSC) dated  
November 16, 1984

Inspection Report 50-305/84-15 concerned fire protection activities at the Kewaunee Nuclear Power Plant, and identified four potential violations. As you know, we believe that the items you have cited as potential violations should not be considered as such. Our position on these items was discussed with you at a meeting in Glen Ellyn on January 7, 1985. We appreciate the opportunity to meet with you, and we feel that it was a productive meeting.

The attachment to this letter provides our response to the inspection report, and summarizes the discussion of January 7, 1985. It has been delayed based upon agreement with your staff.

Very truly yours,

A handwritten signature in dark ink, appearing to read "D. C. Hintz".

D. C. Hintz

Manager - Nuclear Power

DJM/js

Attach.

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

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Attachment to Letter from D. C. Hintz to W. S. Little

Dated February 15, 1985

Response to Inspection Report 84-15

Fire Protection

INSPECTION REPORT #84-15

ATTACHMENT

Letter from Mr. D. C. Hintz to Mr. W. S. Little Dated February 15, 1985

Inspection Report 84-15 transmitted by letter from Mr. W. S. Little to Mr. D. C. Hintz, dated November 16, 1984 identified four areas of potential non-compliance. This attachment addresses these potential non-compliances, and the open items and commitments identified in the report.

Response to Inspection Report 84-15 Potential Non-Compliances

2. Penetration Fire Barriers

a. Fire Damper Procedure

NRC Concern

The inspector examined penetration fire barriers during tours of the administration, auxiliary, and turbine buildings.

In the opinion of the inspector the KNPP Technical Specifications Section 4.15(f) required a visual inspection be performed on the fire dampers within the plant. Since no fire damper surveillance procedure was established the inspector felt a violation of the KNPP Technical Specifications had occurred.

WPSC Response

WPSC does not feel that this is a violation/non-compliance on the basis that the intent of the KNPP Technical Specifications, as written, were, and are, being met. As discussed below, the NRC's current interpretation is inconsistent with the original basis, intent, and interpretation of the KNPP Technical Specification.

KNPP Technical Specification 4.15.f states, in part, "Each of the required penetration fire barriers shall be verified to be intact by a visual inspection..."

The Bases of the KNPP Technical Specification 3.15 ("Fire Protection System") with respect to penetration fire barriers, states, in part, "penetration fire barriers are a passive element in the plant protection program..."

Per Branch Technical Position (BTP) CMEB 9.5-1 definition, dampers are automatic, not passive.

Per Appendix A to BTP APCS 9.5-1, there is an implicit difference between penetration, fire barriers, and penetration seal (i.e., penetration fire barriers.)

A review of the history on this subject reveals that proposed fire protection Technical Specifications were requested by letter from K. R. Goller (NRC-DOR) to E. W. James of September 30, 1976, and letter from A. Schwencer (NRC-DOR) to E. W. James of December 1, 1976. This correspondence included a sample section of Standard Technical Specifications (STS) dated November 3, 1976 which states, in part, "fire barrier penetration fire seals shall be verified to be functional by a visual inspection..." Subsequently, proposed Technical Specifications were based on these sample STS. K. R. Goller's letter of November 25, 1977 to E. W. James transmitted the Safety Evaluation Report (SER) for the proposed Technical Specifications. Subsequent to the SER, revisions were made to the proposed Technical Specifications; however, these revisions were not pertinent to the intent of Technical Specification 4.15(f) (i.e., "functional" was changed to "intact" on the basis that

functional implies an active component). A. Schwencer's June 17, 1977 memo changed, among other things, "fire barrier penetration fire seals" to "penetration fire barriers".

A. Schwencer's letter of December 12, 1978 (note that this is post Technical Specifications) addressed the installation of fire dampers in selected locations.

Regulatory Guide 1.120, "Fire Protection For Nuclear Power Plants" (Rev. 1, for comment, November, 1977), defines a "penetration seal" as one type of fire barrier.

Implicit in this correspondence is the basic difference between penetration fire barriers (i.e., penetration fire seals) and fire barrier penetrations.

This difference is further substantiated when a comparison is made between the 1976 STS used as original model for the KNPP Technical Specifications and a recent (Revision 3, 1980) STS. The 1976 version used the term "fire barrier penetration fire seals" with added clarification that these are passive elements in the fire protection program. The 1980 Revision uses the term "fire barrier penetrations", giving fire dampers as a specific example.

Therefore, it is apparent there is a dichotomy in the scope of STS and, more importantly, the NRC's interpretation, since the inception of the KNPP fire protection Technical Specifications.

Additionally, the inspector states, in part, "...nor was documentation provided to show that the required fire dampers had been inspected and demonstrated functional since they were installed in approximately June, 1974."

On the contrary, in November, 1983 an inspection (pursuant to the concerns and guidance of IE Information Notice No. 83-69: "Improperly Installed Fire Dampers at Nuclear Power Plants") of identified fire dampers in ventilation ducts which penetrate fire barriers in safety-related areas was initiated. At the time of this NRC fire protection inspection all accessible fire dampers had been visually inspected. Evidence of these inspections were provided to the inspector. Dampers that were inaccessible (approximately three) due to system operability constraints, or lack of access/inspection doors, are tentatively scheduled for inspection during the spring 1985 refueling outage.

WPSC acknowledges that fire dampers are an intrinsic part in preventing the spread of a fire. In keeping with our past practice of always trying to improve our fire protection program, a formal inspection procedure will be developed to inspect fire dampers. This procedure will be developed prior to our next damper inspection and will coincide with the fire barrier inspection procedure. On a five year basis commencing at this time a drop test of these dampers will be performed to demonstrate damper operability.

b. Plant Tour of Penetration Fire Barriers

NRC Concern

By letter dated January 25, 1984, the licensee committed to provide passive fire protection consisting of a three-hour fire wall to isolate the 1A auxiliary feedwater pump from fire area TU-95. This created a new fire area identified as TU-95C. Completion of this modification assured no fire would spread from fire area TU-95 to fire area TU-95C ensuring operability of the 1A auxiliary feedwater pump and allowing the plant to achieve and maintain a safe shutdown condition by assuring that an adequate heat sink was available. During a plant tour the inspector observed pieces of pyrocrete fire sealant material lying at the bottom of the curtain type fire damper in the auxiliary feedwater pump 1A, fire wall. In the opinion of the inspector the damper was "apparently being prevented from closing." The inspector determined this to be a violation/non-compliance based on 10 CFR 50 Appendix A (Quality Standards) and KNPP Technical Specifications (inadequate fire watch procedures).

WPSC Response

In our judgement, the accumulation of pyrocrete fire sealant at the bottom of the damper was insufficient to impair the operation of the referenced damper. We have every confidence that the damper in question would have performed as necessary. That in itself should provide adequate justification for retracting this violation/non-compliance. Furthermore, documentation was provided to the inspector to verify that a fire watch was in effect on at least one side of the affected penetration on an hourly basis, thereby satisfying the KNPP Technical Specification requirements.

WPSC disagrees with the inspector's interpretation that Criterion 1 of Appendix A to 10 CFR 50 is applicable to Fire Protection systems, structures and components. Criterion 1 is applicable to "structures, systems, and components important to safety." Generally, fire protection systems are not "important to safety" as defined by 10 CFR 50.

However, WPSC has recognized, and as the inspector notes, has committed to applying appropriate quality assurance requirements to fire protection. This does not mean that a procedure is required for each and every activity associated with fire protection. We feel that procedures are not required for activities which are well within the skills of the person performing them. Procedures are written for activities which require a higher level of skill, special guidance, or great detail. The existence of numerous procedures related to implementation of fire protection activities provides evidence that we have not ignored this commitment.

7. Procedural Review

NRC Concern

- (3) Administrative Control Directive No. ACD 14.1 indicates the Plant Fire Marshal is responsible for the day-to-day administration of the Kewaunee Fire Protection Program and will designate an alternate as deemed necessary having responsibilities including periodic inspection of all fire protection equipment and fire brigade/fire team equipment. The Plant Fire Marshal on an informal basis presently inspects the fire brigade/fire team equipment on his monthly tour of the plant and logs this tour accordingly. At the time of the inspection no formal written procedure was established and implemented to periodically inspect all fire brigade/fire team equipment including an operability check of the hand-held lights and ventilation equipment, and an inventory check of the fire brigade personal protective equipment. Failure to develop a formal written procedure to periodically inspect the fire brigade/fire team equipment including an operability check of the hand-held lights and ventilation equipment, and an inventory check of the fire brigade personal protective equipment is considered to be a violation of Section 5.0 of the licensee's QA Program and of General Design Criteria No. 1 and is an example of an item of noncompliance.

WPSC Response

WPSC does not feel that this is a violation/non-compliance for the reasons discussed below.



General Design Criteria No. 1 (GDC) as implemented through the OQAP, Section 5, "Document Control", states, in part, "This section establishes the requirements and responsibilities for controlling documents which prescribe activities affecting quality." That is to say, this section requires, and administers, the control of appropriate documents, but does not require that these documents initially be established.

It is acknowledged that no formal procedure exists for the periodic inspection of fire brigade/fire team equipment (coats, boots, etc.).

WPSC denies this violation/non-compliance on the basis that the referenced fire brigade/fire team equipment is not safety-related or QA Type 1, and, therefore GDC 1 is not applicable. (See discussion in response to item 2.b.)

This is an example of a case where we have determined that this activity is well within the skills of the person performing it, and can be performed without a procedure with no detriment to public health and safety. This is as allowed by our OQAP.

Furthermore, we believe that minimizing non-essential paperwork is in accordance with our mutual objective of ensuring safety in a manner as efficiently as possible. The desired result, namely, that the equipment is inspected, is currently being achieved. This is in concert with the intent of Mr. R. C. DeYoung's memorandum of March 26, 1984 where he noted that the NRC's "inspections should be directed at determining whether activities are being adequately performed." The inspector acknowledged that this is the case.

9. Training and Qualification of Fire Watches

NRC Concern

The inspector attended the General Employee Training (GET) in which approximately five minutes were devoted to fire protection training. The inspector held discussions with the licensee regarding the present requirements to qualify an individual as a fire watch. The licensee indicated that non-brigade members may perform fire watch duties and that these individuals, whether Wisconsin Public Service Corporation (WPSC) employees or contractor personnel, receive no classroom training in the use of portable hand-held or wheeled unit types of fire extinguishing equipment nor are they required to attend and participate in the annual hands-on training held on-site.

Paragraph 2.9(b)(3) of attachment No. 4 of an NRC supplemental guidance transmittal to the licensee dated February 14, 1978, states that a fire watch trained and equipped to prevent and combat fires is present throughout any operation in which there is potential for fire that might damage safety-related equipment including cutting, welding, grinding or open flame work. Further, this paragraph references NFPA 51B which requires individuals performing as a fire watch to have fire extinguishing equipment readily available and trained in its use, including practice on test fires.

The licensee was unable to provide documented evidence that either licensee personnel or offsite contractor personnel performing fire watch duties were adequately trained in fire protection involving hands-on training on test fires.

Failure to document adequate training of individuals performing fire watch duty is considered to be a violation of Attachment No. 4, Section 2.0(b)(3) of the supplemental guidance and of General Design Criteria No. 1 and is an example of an item of noncompliance.

WPSC Response

WPSC agrees that licensee personnel and contractor personnel performing fire watch duties should have hands-on training on test fires. This training is provided to virtually all KNPP plant personnel as documented in our training records. However, to further strengthen our fire protection program hands-on training on test fires will be given to contractor personnel performing fire watch duties. As explained below, we feel that there is no basis for the violation/non-compliance.

The report referenced attachment No. 4 of an NRC supplemental guidance, to WPSC, dated February 14, 1978. The WPSC response, dated August 4, 1978 committed WPSC to establishing an administrative control directive requiring a specific review (pertinent to the performance of work in safety-related areas) to identify fire hazards and to assure adequate fire protection is provided.

Section 5.5 of the KNPP Fire Hazards Analysis entitled "Position E - Fire Detection and Suppression" addresses those topics exclusively, and states, in part, "All applicable NFPA Standards, as listed in Table 5.5-1, 'List of NFPA Standards Applicable to Kewaunee Plant' have been observed according to professional interpretation and good fire protection practice." The enforced application of the NFPA Standards cited in Table 5.5-1, beyond the intended scope of Section 5.5 of the Fire Hazards Analysis, is inappropriate.

The report referenced the GET given to all site-badged personnel. This training video tape was, at the time of the inspection, under revision for, in part, additional fire protection instruction. The fire protection section has been expanded to include specific instruction on the types of portable extinguishers, their actuation, and use. This video tape is available for use in the indoctrination of personnel being site-badged for the upcoming refueling outage.

The inspector cited GDC 1 as a basis for the violation/non-compliance.

WPSC denies this violation/non-compliance on the basis that:

- 1) GDC 1 is not applicable, as discussed in the response to item 2.b.
- 2) The commitment stated in the August 4, 1978 WPSC response to the referenced NRC supplemental guidance is being met.

However, WPSC will institute training for those persons who had not received fire extinguishment training and who would be utilized to be a fire watch during those evolutions involving welding, cutting, grinding, brazing, or soldering of metal. This training will be implemented for the 1985 refueling outage.

Response to Inspection Report 84-15 Open Items

1. Persons Contacted

NRC Concern

This section identifies the personnel contacted and the list of documents reviewed throughout the inspection.

WPSC Response

No comments required.

2. Penetration Fire Barriers

a. Fire Damper Procedure

See response to notice of violation.

b. Plant Tour of Penetration Fire Barriers

See response to notice of violation.

3. Technical Specifications

NRC Concern

The inspector examined the licensee's plant technical specifications including penetration fire barriers, fire water system, fire detection instrumentation and low pressure CO<sub>2</sub> system sections. No items of non-compliance or deviations were identified.

WPSC Response

No comment required.

4. Fire Hose Station Use

NRC Concern

The inspector's concern is that excessive interior fire hose station pressures (above 100 PSI) having combination (straight stream/fog stream) type nozzles could result in consequences similar to those identified in Information Notice 83-41 (inoperability of systems important to safety or required for safe shutdown). This is considered an open item pending resolution.

WPSC Response

To insure the safety of personnel and equipment, interior fire hose stations in safety related areas having pressures above 100 psig and having combination (straight stream/fog stream) type nozzles will be modified by the installation of pressure reducing devices or an acceptable equivalent. This modification should be complete by September 30, 1985.

5. Fire Protection Equipment Approval for Fire Protection Use

NRC Concern

The inspector wanted verification that the fire pumps, their controllers, and isolation and check valves located in the fire protection system have a nationally recognized laboratory label or stamp indicating that these components are approved for fire protection use.

WPSC Response

An investigation was undertaken to determine whether the above items have a nationally recognized laboratory label or stamp indicating that these components are approved for fire protection use. Results of the investigation have revealed that:

- 1) the fire pumps are both UL and FM labeled; this was verified by checking the label mounted on the fire pump casing.
- 2) the Lexington controllers are both UL and FM labeled as indicated on the purchase order. This was also visually verified by checking the inside of the cabinet where the labeling is placed for electrical equipment.

- 3) the USAR does not state that isolation and check valves are approved; this is beyond the scope of the requirements. Piping and valves were installed as per ANSI B31.1-1967.

6. Administrative Controls

a. Unsealed Openings in Newly Constructed Walls

NRC Concern

The inspector conducted tours of the turbine building, auxiliary building, administrative building, and plant yard areas to examine the implementation of the licensee's fire protection administrative controls including the adequacy of the plant Manual Fire Fighting Equipment. During a plant tour the inspector observed two areas of the plant which had unsealed openings in newly constructed walls built to satisfy Appendix R modification commitments. Since compensatory measures were being instituted (fire watch patrol) according to KNPP Technical Specifications this item is being considered an open item.

WPSC Response

It appears that there is some confusion in regards to this item. WPSC is actively pursuing a program to obtain compliance with Appendix R by the end of our 1987 refueling outage. Our schedule for completion has been approved by NRR. Therefore, according to current Technical Specifications and our Appendix R commitments, the areas identified are not yet separate fire areas, and there is no requirement to maintain a fire watch in these areas due to unsealed penetrations. Fire watches are currently being maintained in these areas due to concerns regarding the fire rating of the doors in these areas. We feel the inspection report should be clarified in this regard.



b. Fire Equipment Houses

NRC Concern

During a plant tour the inspector inspected the eight fire equipment houses located along the roadway within the area commonly referred to as the plant yard. During the plant yard tour the inspector observed that in three cases the pre-connected 2-1/2" fire hose was incorrectly attached to the wrong 2-1/2" hydrant outlet.

The inspector requested that future training of the fire brigade/fire team members assigned surveillance inspection duties of these equipment houses include as part of their training session a discussion on the purpose of the fire hydrant gate valve.

The inspector also noted that one fire equipment hose house contained a small amount of waste debris. The inspector felt that this should be an additional item added to the surveillance inspection procedure for the fire equipment hose house.

WPSC Response

Future training of fire team and fire brigade members will include a discussion on the purpose of the fire hydrant gate valves. This will be included in the fire team/fire brigade training agenda for the calendar year 1985.

The inspector's additional concern regarding miscellaneous waste debris in fire equipment hose houses was already a part of the preventative maintenance procedure and hence no procedure revision is necessary. We feel the debris left in the one fire equipment hose house was an isolated incident resulting from personnel oversight and hence no further action is required.

7. Procedural Review

NRC Concern

The inspector examined a number of licensee fire protection related procedures including surveillance procedures, operating procedures, administrative control directives, technical support procedures, security training procedures, and maintenance procedures.



The following comments were identified during the inspectors' on-site and in-office review:

- (1) Surveillance Procedure No. SP-08-189 failed to include a step to mark the hose so as to determine slippage of the hose from the coupling while the hose is under test pressure as identified in Section 4-1.3 of NFPA No. 196-1974.

WPSC Response

Though not specifically committed to the cited NFPA code, this suggestion is prudent and can be formally implemented during the next revision of the applicable procedure. It should be noted that this practice is currently being informally done (i.e., undocumented) during the performance of the existing surveillance procedure.

NRC Concern

- (2) Surveillance Procedure No. SP 08-188 regarding the fire pumps flow test failed to include the original pump performance curve and data as part of the acceptance criteria.

WPSC Response

Though this information may be useful for long term trending of pump performance, the existing procedure acceptance criteria is adequate to ensure proper pump performance, including sufficient margin for pump degradation. A procedure revision is not planned.

NRC Concern

- (3) Inspection of Fire Fighting Equipment

WPSC Response

See response to notice of violation.

8. Fire Fighting Strategies

NRC Concern

The inspector examined licensee transmittals and administrative procedures including fire brigade fire fighting strategies. By letter dated May 26, 1978, the licensee stated that fire fighting procedures call for full

breathing apparatus to be employed by the fire brigade in fighting fires in the controlled area.

During the inspector's review of the fire brigade fire fighting strategies some of the areas which contain radioactive or contaminated materials did not include a precaution to the fire brigade members to don self-contained breathing apparatus prior to entering these areas under fire conditions.

This item is considered an open item pending revision of the fire brigade fire fighting strategies including the donning of self-contained breathing apparatus.

WPSC Response

A precaution pertaining to the use of self-contained breathing apparatus in controlled areas has been added to the applicable fire fighting strategies.

9. Training and Qualification of Fire Watches

See response to notice of violation.

10. Fire Brigade Training

a. Annual Fire Brigade Practice Sessions

NRC Concern

The inspector examined the licensee's implementation of their fire brigade training program including classroom training, drills, practice session, annual extinguisher, and annual self-contained breathing apparatus training.

The fire brigade manpower of five members is divided into the "fire brigade" consisting of three fire brigade members and two "fire brigade team assistants." The fire brigade team assistants are security officers who do not receive the same annual training that the fire brigade members receive.

Some members of the fire brigade annually attend the Waukesha County Technical School Fire Fighting Training Program; however, the fire brigade team assistants do not attend.

The inspector questioned whether the licensee's annual practice session for the fire brigade team assistants is considered to be adequate in meeting the minimum acceptable annual training requirements as understood by NRR in the licensee's commitment. This item is being considered an unresolved item.

WPSC Response

WPSC contests this unresolved item on the basis that all fire brigade members receive at least the minimum required training.

The report states, in part, "The inspection determined that the fire brigade team assistants were security officers who do not receive the same annual training that the fire brigade members receive."

This statement is correct, however, it should not be misconstrued. The fact is all fire brigade members receive at least the minimum required training, per the Administrative Control Directives, including hands-on training on portable extinguishers, self-contained breathing apparatus, and hose handling techniques.

We feel that since the training provided to fire brigade members is at least the minimum required (per the ACD) this should not be an unresolved item. Additional training provided (i.e., Waukesha County Technical School Fire Fighting Training Program) is in excess of the minimum and is at the discretion of the licensee.

b. Crediting of Fire Brigade Training

NRC Concern

The inspector determined that the licensee in some instances is taking credit for two quarterly drill sessions and two classroom sessions for brigade members when they attend the annual practice training session. Also, the licensee is taking credit for the regular planned meetings (classroom instruction) as part of their quarterly drill training program. The inspector indicated to the licensee that sufficient justification can be provided for crediting one quarterly drill session to individual brigade members who attend the annual practice training but no further credit can be justified.

The inspector indicated that the licensee's present method of taking credit for training does not meet the entire scope of NRC's supplemental

guidance recommendations ("Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance," Attachment No. 2 Section 2.0 dated February 14, 1978). However, the inspector acknowledges that the licensee is meeting their commitment. It was determined that the licensee may take credit for one drill or classroom session in addition to taking credit for the annual practice session when members of the fire brigade attend the Waukesha County Technical School Fire Fighting Training Program.

#### WPSC Response

The inspector acknowledged that WPSC is currently meeting the fire brigade training/drill commitment. However, in order to avoid confusion, and the potential for conflict, record-keeping, and training/drill administration practices have been changed for the calendar year 1984 to preclude additional crediting of fire brigade training activities.

### 11. Plant Fire Marshal Duties and Responsibilities

#### NRC Concern

By letter dated May 15, 1978, the licensee stated, "The Training Supervisor is responsible for plant fire brigade training." At the time of this inspection, the inspector determined by review of fire brigade training records for the years 1983 and 1984 that this is not the present practice. Essentially all fire brigade training records reviewed indicated that the Plant Fire Marshal had conducted the training sessions and in a small number of training sessions was assisted by the Plant Systems/Reliability Supervisor.

At the exit interview the Nuclear Services Supervisors indicated that at the time the May 15, 1978 letter was written the Training Supervisor and Plant Fire Marshal were the same individual.

The inspectors' concern relates to the Plant Fire Marshal's ability to perform all of the assigned tasks while at the same time maintaining a performance level commensurate with the minimum acceptable as deemed by NRC Fire Protection Program requirements.

The inspectors' past inspection experience has shown that many of the Plant Fire Marshal responsibilities discussed during this inspection are shared duties with other plant personnel at other nuclear sites.

This item is considered an open item pending a review by the licensee of the Plant Fire Marshal's duties and responsibilities which should include veri-

fication that the Plant Fire Marshal's overall job responsibilities are such that they do not interfere to the extent of causing Kewaunee's Fire Protection Program to fall below previously accepted minimum requirements as set forth by the licensee's Facility Operating License, Technical Specifications, and other licensee transmittals.

WPSC Response

The report addresses the shift of training responsibilities from the Training Supervisor (in 1978) to the Plant Fire Marshal (currently). The report infers that, currently, the two functions (fire brigade training and plant fire marshal) lack differentiation. In fact, the separation of responsibilities pertaining to the plant fire protection program are essentially the same as in 1978. That is, in 1978 as is the current practice, the person who performs the fire brigade training also performs the routine plant fire marshal duties.

Additionally, this person (the Nuclear Fire Protection Coordinator) implements periodic inspections concerning combustibles in safety-related areas, housekeeping practices, and the availability and condition of the fire protection systems and equipment.

Assuming commitments, license requirements, and other necessary objectives are met, the delegation of job responsibility is entirely at the discretion of the licensee. The inspector's concerns are beyond the scope of the inspection.

12. Walkdown of Control Room Inaccessibility Procedure

NRC Concern

The inspector requested an inspection and walkdown of the control room inaccessibility procedure (Operating Procedure No. E-0-06). During this walkdown the inspector, accompanied by the operation supervisor, determined two steps were in need of being relocated in the procedure.

In addition, the licensee indicated an additional gai-tronics unit was to be installed in 1A Diesel Generator Room to better enable Control Operator A perform the necessary actions as designated in Operating Procedure No. E-0-06.

These items are being considered open items pending review of operating procedure E-0-06 and installation of this additional gai-tronics unit in 1A Diesel Generator Room.

#### WPSC Response

This procedure (E-0-06) will be reviewed with respect to the inspector's concern, and revised as appropriate.

At the time of the inspection, a single-channel gai-tronics unit was available in 1A Diesel Generator room. Since then a five channel gai-tronics unit has been added and is now operable.

### 13. Communications

#### NRC Concern

A recent Unusual Event which occurred as a result of a fire at another Region III site involved a building housing electrical switchgear for the A cooling tower (not safety related) located outside the protected area. The building was destroyed and along with it a gai-tronics phone unit. Discussions between the licensee and the NRC have disclosed that as a result of this gai-tronics unit being exposed to the intense heat of the fire and subsequent melting, the entire gai-tronics communications system throughout the plant was lost including units located in safety related areas and areas containing equipment required for a safe plant shutdown.

This matter was discussed between the inspector and a member of the licensee's staff who agreed to have a review of the gai-tronics communications system performed.

This item is considered an open item pending the licensee's review of their gai-tronics communications system.

#### WPSC Response

In accordance with the commitment a review of the gai-tronics communication system was initiated. Results of the investigation indicate that the KNPP

gai-tronics communications system is not subject to total system failure on the loss of a single unit. The KNPP gai-tronics communication system is "zoned" by power supply. This design prevents a single fire from taking out the entire plant gai-tronics communication system.

14. Emergency Lighting

a. Inspection for Compliance with Section III.J of Appendix R

NRC Concern

10 CFR 50, Appendix R, Section III.J requires that emergency lighting units with at least an eight-hour battery power supply shall be provided in all areas needed for operation of safe shutdown equipment and in access and egress routes to those areas.

At the entrance interview the inspector was informed by members of the licensee's plant management staff that a letter dated September 6, 1984 was sent to NRR identifying that the existing emergency lighting at Kewaunee has only been provided in the areas of the control room and the dedicated shutdown panel room.

The licensee committed to have installed and operable all required emergency lighting by November 1, 1984.

WPSC Response

The installation of additional emergency lighting units along the access and egress routes between the control room and dedicated shutdown panel is complete.

b. Emergency Lighting Maintenance Procedures

NRC Concern

The inspector reviewed the licensee's emergency lighting maintenance procedure identified as PMP 41-1. This procedure did not verify lighting unit(s) lamp direction adequacy so as to assure conformance to design parameters.

This item is considered an open item pending revision of procedure No. PMP 41-1.



WPSC Response

Procedure PMP 41-1 will be reviewed to determine the need for inclusion of lamp aiming instructions.

c. Emergency Lighting Units Discharge Test

NRC Concern

At the request of the inspector, a full (eight hour) discharge test was performed on three emergency lighting units to determine the operability of the units in their installed condition.

No items of noncompliance or deviations were identified.

WPSC Response

No comment required.

15. Oil Collection System for Reactor Coolant Pumps

NRC Concern

The inspector was unable to examine the licensee's installed oil collection systems for the reactor coolant pump motors due to the plant operating at full power (100%) resulting in limited access to the containment building. However, the inspector was provided with documentation including drawings that represented the installed oil collection system. That documentation was examined to determine the oil collection system capacity, verify the oil collection tank is a closed, vented tank, that the collection tank supports and related equipment were designed to Category 1 seismic qualifications (withstand the safe shutdown earthquake) and that the collection tank vent has a flame arrester installed. The engineering design drawings and other documentation examined showed that the oil collection systems for the reactor coolant pumps was in accordance with Section III.0 of Appendix R to 10 CFR 50.

WPSC Response

No comment required.