

WISCONSIN PUBLIC SERVICE CORPORATION

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



February 14, 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
 Inspection Report 84-21

Reference: Letter from W. S. Little (NRC) to D. C. Hintz (WPSC) dated
 January 15, 1985, transmitting Inspection Report 50-305/84-21

The attachment to this letter details our response to the items of non-
 compliance identified in inspection report 50-305/84-21(DRS).

Very truly yours,

A handwritten signature in cursive script that reads "Carl Giesler".

D. C. Hintz
 Manager - Nuclear Power

DSN/jks

Attach.

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

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Attachment

Response to Items of Noncompliance

Inspection Report 84-21

Items of Noncompliance

1. Kewaunee Technical Specification 4.2, ASME Code Class In-Service Inspection and Testing, states that the inservice testing of pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code except where relief is granted by the Commission.

Contrary to the above, the licensee failed to request relief from Code testing requirements prior to implementing testing that was at variance with the Code in three areas:

- a. Stroke timing of valves did not include the elapsed time from initiation of the actuating signal to the end of the actuating cycle as required by Subsection IWV-3413 of Section XI.
- b. Pump suction pressure was not measured with the pump idle as required by Subsection IWP-3100.
- c. Valve leak testing and corrective action was implemented per the method described in 10 CFR 50, Appendix J, in lieu of that described in Subsection IWV-3420 through IWV-3427.

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

Response

- a. The surveillance procedures which provide the exercise timing tests are being reviewed and revised to require timing from initiation of the actuating signal to the end of the actuating cycle. The operations personnel will time the valve travel by starting the stopwatch when the control switch in the control room is actuated and stop the watch upon illumination of the position (open/close) indicating light. Previous timing tests were performed from light to light (limit switch indicators). We expect the valve timing test procedures to be revised by August 1, 1985.

- b. The pump test procedures are being revised to require measurement of suction pressure with the pump idle in addition to the already measured suction pressure during pump operation. The idle pump suction pressure will be measured for those pumps for which previous relief requests have not been requested. If relief has previously been requested for measurement of the suction pressure it is to be understood that the relief applies to both the operating and idle pump conditions. The procedure revisions to incorporate this measurement will be completed by August 1, 1985.
- c. A relief request describing our intent to perform containment isolation valve leakage testing and corrective actions in accordance with 10 CFR 50, Appendix J in lieu of that described in Subsections IWV-3420 through IWV-3427, has been generated and will be submitted by March 1, 1985.

Item of Noncompliance

2. Criterion XII of 10 CFR 50, Appendix B, as implemented by Wisconsin Public Service Corporation, "Operational Quality Assurance Program Manual," Section 10, requires the use of calibrated equipment in "activities affecting quality."

Contrary to the above, the licensee failed to require the use of calibrated tachometers or stopwatches in their surveillance testing procedures.

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

Response

We are currently reviewing our inservice testing surveillance procedures to identify the measuring and testing devices used to implement the inservice testing program. We will verify that the testing devices identified receive periodic calibration.

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In an effort to assure that calibrated equipment is used during testing we will also revise the inservice testing surveillance procedures to require identification of the instrument used.

We expect this effort to be completed by August 1, 1985.

Other Items

Unresolved item 84-21-02 regarding remote position indicator verification has been evaluated. We are implementing a program which will verify that the limit switches for the valves included in the inservice testing program are set such that the remote position indicators (lights) in the control room are accurately indicative of actual valve position. We will keep the NRC inspector Mr. P. R. World informed of our progress on this project.