



Kewaunee Nuclear Power Plant
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6610 Nuclear Road
Two Rivers, WI 54241
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Kewaunee / Point Beach Nuclear
Operated by Nuclear Management Company, LLC

November 27, 2001

Mr. Roger Lanksbury
U.S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

Dear Mr. Lanksbury:

Attached you will find a addition to your T.S. Interpretation Book. If you are not a holder of a T.S. Interpretation Book please insert this clarification at the beginning of your T.S. Manual.

Please follow the instructions on the attached page. If you have any technical questions, please contact Tom Webb at (920) 388-8537. If you have any administrative questions or you are not the appropriate individual for receipt of these revisions, please contact Sandy at (920) 388-8604.

Sincerely,

Sandy Champion

Sandy Champion

Attachments

cc: KNPP QA Vault

DEC 3 2001

Figure NAD 3.11-1

KEWAUNEE NUCLEAR POWER PLANT

DATE: 11-25-01

Shift Supervisor's Office
Simulator Control Room
Green Bay - Nuclear Licensing and Systems Superintendent
Plant Manager
Plant Licensing Group - Plant Licensing Supervisor
QA Vault - Plant Records Supervisor

cc: Copy to all TS Holders (Not Controlled)

DISTRIBUTION FOR TECHNICAL SPECIFICATION INTERPRETATION BOOK

Attached is a clarification memo for Technical Specification 3.3.e and an updated index for your T.S. Interpretation Book. Follow the instructions below when revising your book. After this has been completed, sign and return a copy of this transmittal letter as a record of revision (applies to controlled copy holders only).

REMOVE

None

INSERT

Attached

Plant Licensing Supervisor

Tom Wehl
for

I certify that the revised pages or supplement for the document described herein has been entered.

Signature

Date

When update is complete, please return a copy of this page for a record of revision to Mary Jo Merholz - Plant Licensing Group - KNPP.

November 24, 2001

Kewaunee Nuclear Power Plant

Control Room – KNPP
EOF – GB D2
QA Vault – KNPP
Shift Supervisor – KNPP
Simulator Control Room (2) – KNPP
TSC (Jan Mueller) – KNPP

cc – All TS holders

Subject: Administrative Controls for Turbine Building Service Water Header Isolation Logic

Below are the administrative controls for the isolation logic for valves SW-4A and SW-4B. The isolation logic will isolate the turbine building service water header during accident conditions. Any change to these requirements will require a PORC review and Plant Manager's approval.

The service water header isolation logic is only required to function for the service water train aligned to the turbine building header during a design basis accident. Therefore, the operability of the service water train not aligned to the turbine building header is independent of the operability of the isolation logic.

A. IF One train of Isolation Logic is inoperable and the affected train of service water is **NOT** aligned to the turbine building header, the following action shall be taken:

1. Administratively control the alignment of the service water train to prevent its alignment to the turbine building header.

B. IF One train of Isolation Logic is inoperable and the affected train of service water is aligned to the turbine building header, the following action shall be taken immediately:

1. Declare that train of Service Water inoperable.

a. The following actions shall be completed within 72 hours:

1. Align the opposite train of service water to the turbine building header.

OR

2. Restore the Isolation logic train to OPERABLE status.

C. If two trains of Isolation logic are declared inoperable, the following actions shall be taken immediately:

1. An otherwise Operable train of service water Shall be de-selected as the supply for the turbine building header.

AND

2. Declare the train of service water aligned to the turbine building header inoperable.

a. The following actions shall be completed within 72 hours:

1. One train of Isolation Logic shall be restored to Operable status.

AND

2. A train of service water with an operable train of isolation logic shall be aligned to the turbine building header.

D. If the conditions of A, B, or C are not met, commence Plant Shutdown in accordance with TS 3.3.e.2

BASIS

These ADMINISTRATIVE CONTROLS provide a short-term corrective action until a License Amendment Request is submitted to and approved by the NRC. These administrative controls are consistent with the guidance provided by NRC Administrative Letter 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety." The Letter states, in part, "Imposing administrative controls in response to an improper or inadequate TS is considered an acceptable short-term corrective action. The staff expects that, following the imposition of administrative controls, an amendment to the TS, with appropriate justification and schedule, will be submitted in a timely fashion."

Applying the restriction described in this administrative control and the requirements specified in TS 3.3.e could result in the inoperability of redundant trains of service water. In this case, the plant shall be down in accordance with TS 3.3.e.2.

The turbine building service water header isolation logic automatically closes valves SW-4A and SW-4B on a Safety Injection (SI) signal coincident with a service water low pressure signal. Failure to isolate the turbine building from the service water header during a design basis Accident may result in decreased pressure in the Containment Fan Coil Units or decreased heat removal capability in other safety-related components. The isolation logic is only required to function for the SW train aligned to the turbine building header during a design basis accident. Therefore, the operability of the service water not aligned to the turbine building header is independent of the operability of the isolation logic.

If either input into the isolation logic is inoperable, the isolation function can be returned to operable status by tripping the affected circuit or closing the affected valve.

The Isolation Logic is OPERABLE when turbine building service water header isolation valves (SW-4A and SW-4B) are capable of automatically closing in 22 seconds from a Safety Injection signal coincident with a Low Header Pressure Signal from the service water header pressure switches.

Because the Isolation Logic ensures adequate service water to safety-related components, these ADMINISTRATIVE CONTROLS are applicable whenever Technical Specification 3.3.e for service water applies.

Considering the Allowed Outage Time (AOT) for one train of service water used in TS 3.3.e, it is consistent to apply the 72 hour AOT for one train of Isolation Logic. The 72 hour AOT to switch to the turbine building load to the OPERABLE train of service water is consistent with TS 3.3.e.

If the plant is in conditions C, it is not acceptable to alternate the alignment of the SW trains to extend the allowed out of service time.

In the event CONDITIONS A, B, or C can not be met, a plant shutdown as described in the TS requirements for exceeding the AOT on service water will commence.

Licensing Supervisor *Tom Wohl* Date 11-25-01
for KIH

PORC Chairman *Pat Mende* Date 11/25/01