

January 22, 1985

Docket No. 50-305

DISTRIBUTION

Mr. D. C. Hintz  
Manager - Nuclear Power  
Wisconsin Public Service Corporation  
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Dear Mr. Hintz:

The Commission has issued the enclosed Amendment No. 60 to Facility Operating License No. DPR-43 for the Kewaunee Nuclear Power Plant. The amendment consists of changes to the Technical Specifications in response to your application transmitted by letter dated June 4, 1984 and as revised August 21, 1984. This action closes out our TAC Number 55221.

The amendment consists of changes to position titles and includes minor organizational changes. In addition, it includes additional Senior Reactor Operator requirements, clarification of environmental sample locations and corrections of minor errors.

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular monthly Federal Register notice.

Sincerely,

/s/MBFairtile

Morton B. Fairtile, Project Manager  
Operating Reactors Branch #1  
Division of Licensing

Enclosures:

1. Amendment No. 60 to DPR-43
2. Safety Evaluation

cc: w/enclosures  
See next page

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Mr. D. C. Hintz  
Wisconsin Public Service Corporation

Kewaunee Nuclear Power Plant

cc: Steven E. Keane, Esquire  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

WISCONSIN PUBLIC SERVICE CORPORATION  
WISCONSIN POWER AND LIGHT COMPANY  
MADISON GAS AND ELECTRIC COMPANY

DOCKET NO. 50-305

KEWAUNEE NUCLEAR PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 60  
License No. DPR-43

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Wisconsin Public Service Corporation, Wisconsin Power and Light Company, and Madison Gas and Electric Company (the licensee) dated June 4, 1984, as revised August 21, 1984, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-43 is hereby amended to read as follows:

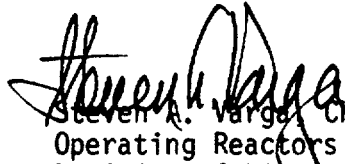
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(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 60, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

  
Steven A. Vargo, Chief  
Operating Reactors Branch #1  
Division of Licensing

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: January 22, 1985

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 60 TO FACILITY OPERATING LICENSE NO. DPR-43

DOCKET NO. 50-305

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
3.1-7	3.1-7
3.10-12	3.10-12
Table TS 3.5-1 (page 1 of 2)	Table TS 3.5-1 (page 1 of 2)
Table TS 3.5- 4 (page 1 of 2)	Table TS 3.5-4 (page 1 of 2)
4.10-1	4.10-1
Table TS 4.10-2 (Page 1 of 1)	Table TS 4.10-2 (Page 1 of 1)
6-1	6-1
6-2	6-2
6-2a	6-2a
6-3	6-3
6-4	6-4
6-5	6-5
6-7	6-7
6-8	6-8
6-11	6-11
6-12	6-12
Figure TS 6.2-1	Figure TS 6.2-1
Figure TS 6.2-2	Figure TS 6.2-2

The results of Irradiation Capsules V and R analyses are presented in WCAP 8908 and WCAP 9878, respectively. Heatup and cooldown limit curves for normal operation of the reactor vessel are presented in Figures TS 3.1-1 and TS 3.1-2 and represent an operational time period of 10 effective fullpower years.

#### Pressurizer Limits

Although the pressurizer operates at temperature ranges above those for which there is reason for concern about brittle fracture, operating limits are provided to assure compatibility of operation with the fatigue analysis performed in accordance with Code requirements. In-plant testing and calculations have shown that a pressurizer heatup rate of 100°F/hr cannot be achieved with the installed equipment.

#### REFERENCES

1. ASME Boiler and Pressure Vessel Code, "Nuclear Power Plant Components" Section III, Summer 1972 Addenda, Non-Mandatory Appendix G - "Protection Against Non-ductile Failure."
2. Standard Method for Measuring Thermal Neutron Flux by Radioactivation Techniques, ASTM designation E262-70, 1975 Book of ASTM Standards, Part 45, pp. 756-763.
3. W. S. Hazelton, S. L. Anderson, and S. E. Yanichko, "Basis for Heatup and Cooldown Limit Curves," WCAP 7924, July 1972.
4. S. E. Yanichko, S. L. Anderson, and K. V. Scott, "Analysis of Capsule V from the Wisconsin Public Service Corporation Kewaunee Nuclear Plant Reactor Vessel Radiation Surveillance Program," WCAP 8908, January 1977.
5. S. E. Yanichko, et al, "Analysis of Capsule R from the Wisconsin Public Service Corporation Kewaunee Nuclear Plant Reactor Vessel Radiation Surveillance Program," WCAP 9878, March, 1981.
6. Letter from P. S. VanTesslaar (Westinghouse) to C. W. Giesler (WPS) dated April 30, 1981, transmitting KNPP Heatup and Cooldown curves based on Capsule R results.

### Rod Bow Effects

The  $F_{\Delta H}^N$  limits of specification 3.10.b.1 include consideration of fuel rod bow effects. Since the effects of rod bow are dependent on fuel burnup an additional penalty is incorporated through a decrease in the  $F_{\Delta H}^N$  limit of 2% for 0-15000 MWD/MTU fuel burnup, 4% for 15000-24000 MWD/MTU fuel burnup, and 6% for greater than 24000 MWD/MTU fuel burnup. These penalties are counter-balanced by credits for increased Reactor Coolant flow and lower Core inlet temperature. The Reactor Coolant System flow has been determined to exceed design flow by greater than 8%. Since the flow channel protective trips are set on a percentage of full flow, significant margin to DNB is provided. One half of the additional flow is taken as a DNB credit to offset 2% of the  $F_{\Delta H}^N$  penalty. The existence of 4% additional reactor coolant flow will be verified after each refueling at power prior to exceeding 95% power. If the reactor coolant flow measured per loop averages less than 92560 gpm, the  $F_{\Delta H}^N$  limit shall be reduced at the rate of 1% for every 1.8% of reactor coolant design flow (89000 gpm design flow rate) for fuel with greater than 15000 MWD/MTU burnup. Uncertainties in reactor coolant flow have already been accounted for in the flow channel protective trips for design flow. The assumed  $T_{inlet}$  for DNB analysis was 540°F while the normal  $T_{inlet}$  at 100% power is approximately 532°F. The reduction of maximum allowed  $T_{inlet}$  at 100% power to 536°F as addressed in specification 3.10.k provides an additional 2% credit to offset the rod bow penalty. The combination of the penalties and offsets results in a required 2% reduction of allowed  $F_{\Delta H}^N$  for high burnup fuel, >24000 MWD/MTU. The permitted relaxation in  $F_{\Delta H}^N$  allows radial power shape changes with rod insertion to the insertion limits.

TABLE TS 3.5-1 (Page 1 of 2)

## ENGINEERED SAFETY FEATURES INITIATION INSTRUMENT SETTING LIMITS

<u>NO.</u>	<u>FUNCTIONAL UNIT</u>	<u>CHANNEL</u>	<u>SETTING LIMIT</u>
1	High Containment Pressure (Hi)	Safety Injection <sup>(1)</sup>	$\leq 4$ psig
2	High Containment Pressure (Hi-Hi)	a. Containment Spray	$\leq 23$ psig
		b. Steam Line Isolation of Both Lines	$\leq 17$ psig
3	Pressurizer Low Pressure	Safety Injection <sup>(1)</sup>	$\geq 1815$ psig
4	Low Steam Line Pressure	Safety Injection <sup>(1)</sup>	$\geq 500$ psig
		Lead Time Constant	$\geq 12$ seconds
		Lag Time Constant	$\leq 2$ seconds
5	High Steam Flow in a Steam Line Coincident with Safety Injection and "Lo-Lo" $T_{avg}$	Steam Line Isolation Affected Line <sup>(2)</sup>	$< d/p$ corresponding to $0.745 \times 10^6$ lb/hr at 1005 psig  $\geq 540^\circ F$
6	High-High Steam Flow in a Steam Line Coincident with Safety Injection	Steam Line Isolation of Affected Line <sup>(2)</sup>	$< d/p$ corresponding to $4.5 \times 10^6$ lb/hr at 735 psig
7	Forebay Level	Trip circ. water pumps	
8	Containment Purge and Vent System Radiation Particulate Detector Radioactive Gas Detector	Containment Ventilation Isolation	$\leq$ value of Radiation Levels in exhaust duct as defined in Note <sup>(3)</sup>



TABLE TS 3.5-4 (Page 1 of 2)

## INSTRUMENT OPERATING CONDITIONS FOR ISOLATION FUNCTIONS

<u>NO.</u>	<u>FUNCTIONAL UNIT</u>	<u>1</u> NO. OF CHANNELS	<u>2</u> NO. OF CHANNELS TO TRIP	<u>3</u> MINIMUM OPERABLE CHANNELS	<u>4</u> MINIMUM DEGREE OF REDUNDANCY	<u>5</u> PERMISSIBLE BYPASS CONDITIONS	<u>6</u> OPERATOR ACTION IF CONDITIONS OF COLUMN 3 OR 4 CANNOT BE MET
1	CONTAINMENT ISOLATION						
	a. Safety Injection		See Item No. 1 of Table TS 3.5-3				Hot Shutdown***
	b. Manual	2	1	1	-		Hot Shutdown
2	STEAM LINE ISOLATION						
	a. Ili-Ili Steam Flow with Safety Injection	2/loop	1	1	-		Hot Shutdown***
	b. Ili Steam Flow and 2 of 4 "Lo-Lo" T <sub>avg</sub> with Safety Injection	2/loop	1	1	-		Hot Shutdown***
	c. Ili-Ili" Containment Pressure	3	2	2	-		Hot Shutdown***
	d. Manual	1/loop	1/loop	1/loop	-		Hot Shutdown

#### 4.10 ENVIRONMENTAL MONITORING

##### Applicability

Applies to the periodic monitoring and recording of radioactive effluents and the routine testing of plant environs.

##### Objective

To verify that radioactive releases are maintained within allowable limits and that plant operations have no significant detrimental effects on the environment.

##### Specification

- a. Environmental samples shall be collected and analyzed according to Table TS 4.10-1, where minor changes in descriptions or locations of specific sampling points may occur as necessitated by private ownership.
- b. Reports shall be submitted in accordance with Section 6.9 of the Technical Specifications.

##### Basis

The operational program of environmental monitoring described in Section 2.8 of the FSAR has been in progress for more than two years before initial plant startup. The number and distribution of sampling locations and the various types of measurement, together with the pre-operational background data, provides verification of the effectiveness of plant effluent control and indication of measurable changes in the activity of the environment. From time to time minor changes to sample locations and/or descriptions are required which do not alter the intent of the sampling program. These changes are permitted by specification 4.10.a above.

TABLE TS 4.10-2

(Page 1 of 1)  
Sampling Locations

<u>Code</u>	<u>Location</u>
K-1	Onsite
1a	North Creek
1b	Middle Creek
1c	North of condenser discharge
1d	Condenser discharge
1e	South Creek
1f	Meteorological tower
1g	South Well
1h	North Well
1i	Deleted
K-2	WPS Operations Building in Kewaunee
K-3	Farm - 6.0 mi N of site
K-4	Farm - 3.0 mi N of site
K-5	Farm - 3.5 mi NNW of site
K-6	Farm - 6.7 mi WSW of site
K-7	Farm - 2.75 mi SSW of site
K-8	Catholic Church - 5.0 mi WSW of site
K-9	Rostok Water Intake for Green Bay, Wisconsin, two miles north of Kewaunee
K-10	Farm - 1.5 mi NNE of site
K-11	Farm - 1.0 mi NW of site
K-12	Farm - 1.5 mi WSW of site
K-13	General Store - 3 mi S of site
K-14	Two Creeks Park - 2.5 miles south of site
K-15	Gas Substation - 9.25 mi NW of site
K-16	WPS Division Office Building, Green Bay, Wisconsin
K-17	Farm - 4.25 mi W of site
K-18	Replaced by K-26
K-19	Farm - 1.75 mi N of site
K-26	Food Stand - 10.7 mi SSW of site

## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The Plant Manager has overall on-site responsibility for plant operation. In the absence of the Plant Manager, the succession to this responsibility shall be in the following order:

- a. Maintenance Superintendent
- b. Operations Superintendent
- c. Assistant Superintendent Operations
- d. Plant Technical and Services Superintendent
- e. Shift Supervisor

### 6.2 ORGANIZATION

#### OFFSITE

6.2.1 The offsite organization for plant management and technical support shall be as shown on Figure TS 6.2-1.

#### FACILITY STAFF

6.2.2 The plant organization shall be as shown on Figure TS 6.2-2 and:

- a. Each on-duty shift complement shall consist of at least:
  - (1) One Shift Supervisor (SRO)
  - (2) Two licensed Reactor Operators
  - (3) One Auxiliary Operator
  - (4) One Equipment Operator
  - (5) One Radiation Technologist
- b. While above cold shutdown, the on-duty shift complement shall consist of the personnel required by 6.2.2a. above and an additional SRO.
- c. In the event that one of the shift members becomes incapacitated due to illness or injury or the Radiation Technologist has to accompany an injured person to the hospital, reactor operations may continue with the reduced complement until a replacement arrives. In all but severe weather conditions, a replacement is required within two hours.

- d. At least one licensed operator shall be in the control room when fuel is in the reactor.
- e. Two licensed operators, one of which shall be an SRO, shall be present in the control room when the unit is in an operational mode other than cold shutdown or refueling.
- f. Refueling operations shall be directed by a licensed Senior Reactor Operator assigned to the refueling operation who has no other concurrent responsibilities during the refueling operation.
- g. A five man fire response team, consisting of 3 Fire Brigade members and 2 Assistant Fire Brigade personnel, shall be maintained. If a member of the fire response team becomes incapacitated due to illness or injury this requirement is deemed satisfied if a replacement arrives within two hours in all but the severest weather.
- h. When the reactor is above the cold shutdown condition, a qualified Shift Technical Advisor shall be within 10 minutes of the control room.

#### ORGANIZATIONAL CHANGES

- 6.2.3 Changes not affecting safety may be made to the offsite and facility staff organizations. Such changes shall be reported to the Commission in the form of an application for license amendment within 60 days of the implementation of the change.

#### 6.3 PLANT STAFF QUALIFICATIONS

- 6.3.1 Qualification of each member of the Plant Staff shall meet or exceed the minimum acceptable levels of ANSI N18.1-1971 for comparable positions, except for the Radiation Protection Supervisor who shall meet or exceed the recommendation of Regulatory Guide 1-8, Revision 1-R, September 1975, or their equivalent as further clarified in Attachment 1 to the Safety Evaluation Report enclosed with Amendment No. 46 to Facility Operating License DPR-43.
- 6.3.2 The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in the design of the Kewaunee Plant and plant transient and accident analysis.

#### 6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the Plant Staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI-N18.1-1971 and Appendix A of 10 CFR Part 55.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Fire Marshall and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except that training sessions shall be held quarterly.

#### 6.5 REVIEW AND AUDIT

##### 6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

###### FUNCTION

- 6.5.1.1 The PORC shall function to advise the Plant Manager on matters related to nuclear safety.

###### COMPOSITION

- 6.5.1.2 The PORC shall be composed of, but not necessarily limited to:

Chairman: Plant Manager

Required Members: Plant Maintenance Superintendent  
Plant Operations Superintendent  
Plant Technical and Services  
Superintendent  
Assistant Superintendent-  
Operations  
Reactor Supervisor  
Quality Control Supervisor

###### ALTERNATES

- 6.5.1.3 Alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PORC meetings at any one time.

MEETING FREQUENCY

- 6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the Chairman.

QUORUM

- 6.5.1.5 A quorum of the PORC shall consist of the Chairman or his designated successor plus three members of which not more than two shall be alternates.

## RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for:

- a. Review of operating, maintenance and other procedures including emergency operating procedures which affect nuclear safety as determined by the plant manager. Changes to those procedures are made in accordance with the provisions of TS 6.8.1.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Review all reports covering the investigation of all violations of the Technical Specifications and the recommendations to prevent recurrence.
- f. Review plant operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and prepare reports thereon as requested by the Chairman of the Nuclear Safety Review and Audit Committee.
- h. Review of the Security Plan and Emergency Plan and their respective implementing procedures and shall submit recommended



changes to the Vice President-Power  
Production.

AUTHORITY

6.5.1.7 The PORC shall:

- a. Recommend to the Plant Manager approval or disapproval of items considered under 6.5.1.6a through d above.
- b. Make determinations with regard to whether or not each item considered under 6.5.1.6a through e above constitutes an unreviewed safety question.
- c. Provide immediate notification in the form of draft meeting minutes to the Manager-Nuclear Power and the Chairman-Nuclear Safety Review and Audit Committee of disagreement between the PORC and the Plant Manager. The Plant Manager shall have responsibility for resolution of such disagreements.

RECORDS

6.5.1.8 Minutes shall be kept of all meetings of the PORC and copies shall be sent to the Manager -Nuclear Power and the Chairman-Nuclear Safety Review and Audit Committee.

6.5.2 CORPORATE NUCLEAR ENGINEERING STAFF (CNES)

FUNCTION

6.5.2.1 The CNES shall function to provide engineering,

6. Review and/or prepare safety evaluations of all plant design changes.
7. Audits as required by the Quality Assurance Program and as outlined in Section 6.5.3.8.

#### AUTHORITY

6.5.2.4 Members of the Fuel Services, Environmental Services, and System Planning and Engineering groups, although not directly responsible to the Manager - Nuclear Power are available for special projects and support to the Kewaunee Plant.

The Nuclear Design Change, Nuclear Services, Nuclear Training, Kewaunee Plant, Nuclear Administration, and Nuclear Licensing and Systems report to the Manager - Nuclear Power.

The Manager of Nuclear Power, Power Plant Design and Construction and QA, and the Nuclear Safety Review and Audit Committee are responsible to the Vice President-Power Production.

#### 6.5.3 NUCLEAR SAFETY REVIEW AND AUDIT COMMITTEE (NSRAC)

#### FUNCTION

- 6.5.3.1 The NSRAC shall function to provide independent review and audit of designated activities in the areas of:
- a. Nuclear Power Plant Operations
  - b. Nuclear Engineering
  - c. Chemistry and Radio-Chemistry
  - d. Metallurgy
  - e. Instrumentation
  - f. Radiological Safety
  - g. Mechanical and Electrical Engineering
  - h. Quality Assurance Practices
  - i. Other appropriate fields as determined by the Committee, to be associated with the unique characteristics of the nuclear power plant.

#### COMPOSITION

- 6.5.3.2 The NSRAC shall be composed of, but not necessarily limited to:

- a. At least three technically qualified persons who are not members of the plant staff.
- b. One member from the supervisory staff of the plant.
- c. At least two qualified non-company affiliated technical consultants.
- d. Plus in-house staff management advisors as required.

The Committee membership and its Chairman and Vice Chairman shall be appointed by the Vice President - Power Production or such person as he shall designate. Each member of the NSRAC shall have an academic degree in an engineering or physical science field; and in addition, shall have a minimum of five years technical experience, of which a minimum shall be in one or more areas given in 6.5.3.1.

#### ALTERNATES

- 6.5.3.3 Alternate members shall be appointed by the NSRAC Chairman, upon approval by the Vice President - Power Production, to serve on a temporary basis; however, no more than two alternates shall participate in NSRAC activities at any one time.

#### CONSULTANTS

- 6.5.3.4 Consultants may be utilized as determined by the Chairman - NSRAC to provide expert advice to the NSRAC.

#### MEETING FREQUENCY

- 6.5.3.5 The NSRAC shall meet at least once every six months.

- g. Any other area of plant operation considered appropriate by the NSRAC or the Vice President-Power Production.

#### AUTHORITY

- 6.5.3.9 The NSRAC shall report to and advise the Vice President-Power Production on those areas of responsibility specified in Section 6.5.3.7 and 6.5.3.8.

#### RECORDS

- 6.5.3.10 Records of NSRAC activities shall be prepared, approved and distributed as follows:
  - a. Minutes of each NSRAC meeting forwarded to the Vice President-Power Production within 14 days following each meeting.
  - b. Reports of reviews required by Section 6.5.3.7e, f, g and h above, forwarded to the Vice President-Power Production within 14 days following completion of the review.
  - c. Reports of audits performed by NSRAC shall be forwarded to the Vice President-Power Production and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 DELETED

## 6.7 SAFETY LIMIT VIOLATION

- 6.7.1 The following actions shall be taken in the event a safety limit is violated:
- a. The reactor shall be shutdown and operation shall not be resumed until authorized by the Commission.
  - b. The Safety Limit violation shall be reported to the Commission, the Manager-Nuclear Power, and to the NSRAC-Chairman within 14 days of the violation.
  - c. The report shall be prepared in accordance with Section 6.9 of the Technical Specifications.

## 6.8 PROCEDURES

- 6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet the requirements and recommendations of Section 5.2.2, 5.2.5, 5.2.15 and 5.3 of ANSI N18.7-1976.
- 6.8.2 Changes to procedures are made in accordance with the provisions of ANSI N18.7-1976 Section 5.2.2 except that changes which clearly do not change the intent of the procedure shall, as a minimum, be approved by two individuals knowledgeable in the area affected one of which holds a valid SRO license at Kewaunee.
- 6.8.3 Deleted

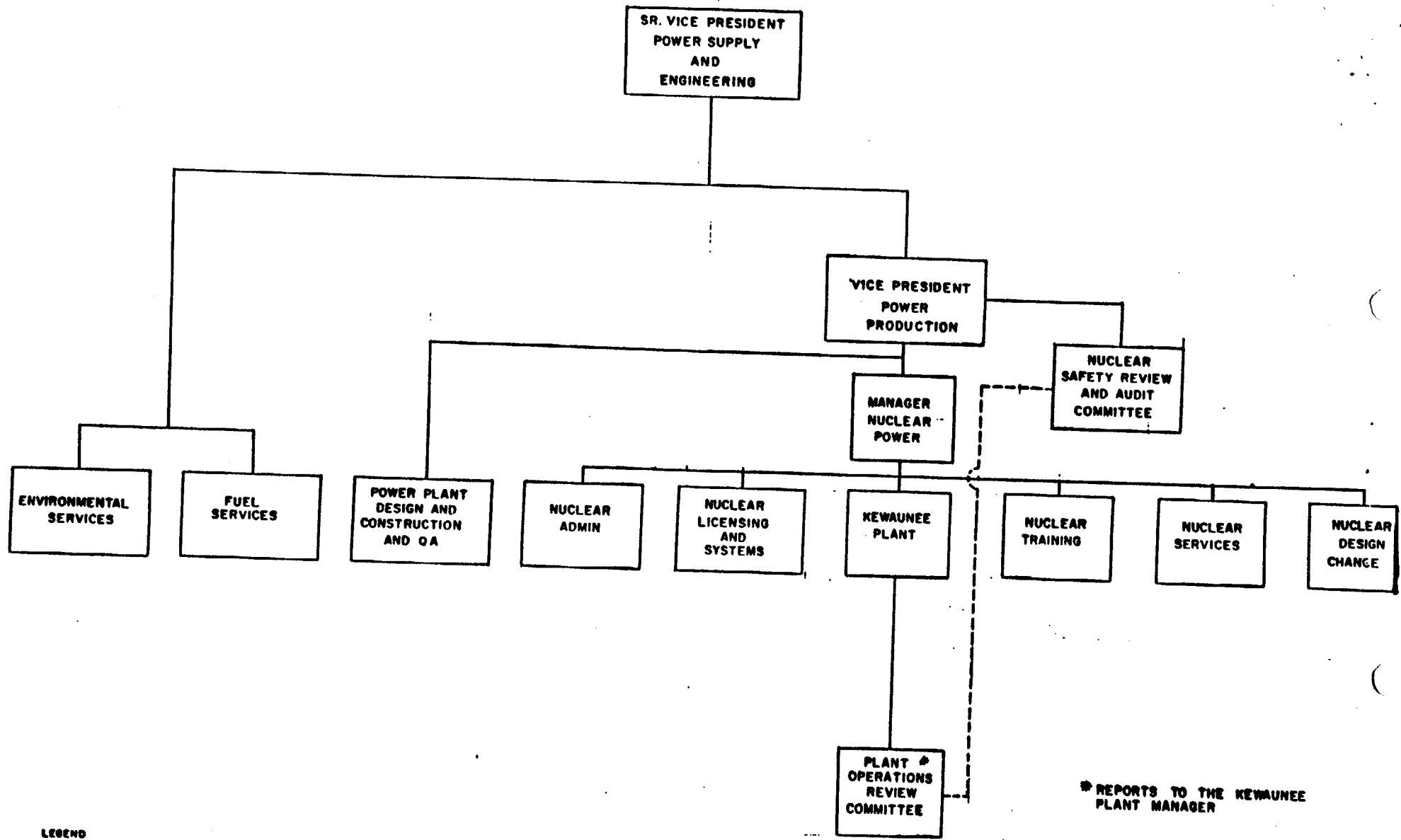
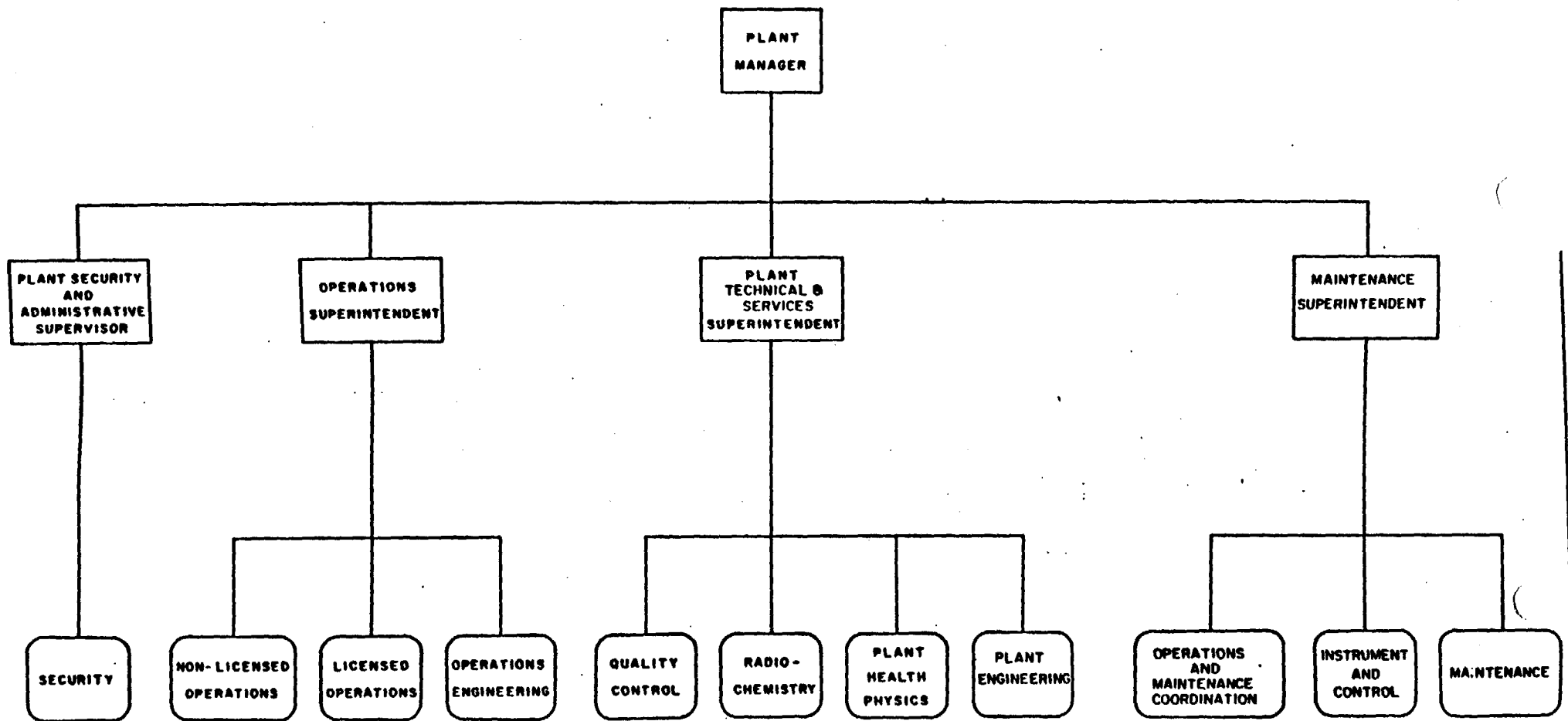


FIGURE TS 6.2-1



AMENDMENT NO. 60

FIGURE TS 6.2-2



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 60 TO FACILITY OPERATING LICENSE NO. DPR-43

WISCONSIN PUBLIC SERVICE CORPORATION

WISCONSIN POWER AND LIGHT COMPANY

MADISON GAS AND ELECTRIC COMPANY

KEWAUNEE NUCLEAR POWER PLANT

DOCKET NO. 50-305

Introduction

On June 4 and August 21, 1984, the Wisconsin Public Service Corporation (the licensee) submitted a proposed Amendment Nos. 60 and 60A with revisions to facility License No. DPR-43 for the Kewaunee Nuclear Power Plant (the facility). The proposed amendments contained several miscellaneous changes to the facility Technical Specifications (TS). The proposed changes include (1) position titles and minor organization changes, (2) the additional Senior Reactor Operator (SRO) requirements of 10 CFR 50.54(2)(i) and (iii), (3) commitments to updated ANSI Standards in the control of procedures, (4) clarification of environmental sample location changes, and (5) corrections of miscellaneous descriptions, grammar and typographical errors.

Evaluation

- A. Change of Title (pages 6-5, 6-7, 6-8, 6-11, and Tables TS 6.2-1 and 6.2-2)

This change is a change in title from the present Vice President - Nuclear Power to Vice President - Power Production. The duties and qualifications other than minor organizational changes remain the same; therefore, we find the change is acceptable.

- B. Organization, Authority of Corporate and Facility Staff (pages 6-1, 6-2, 6-2a, 6-3, 6-7 and Table TS 6.2-1)

Section 6.1.1 was modified to include the Plant Technical and Services Superintendent in the line of succession in the absence of the Plant Manager.

Section 6.2.2.b was added and Section 6.2.2.d revised to meet the requirements of 10 CFR 50.54(m)(2)(i) and (iii) for the minimum staffing of two SROs on-site with one SRO in the Control Room during operations above cold shutdown. Paragraph identification letters were realigned to correct for these changes.

Sections 6.5.1.1, .2, and .3 were rearranged onto page TS 6-2a for clarity and the title Plant Services Superintendent has been changed to Plant Technical and Services Superintendent, reflecting a recent organizational change.

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Section 6.5.2.4 was modified to show the change in position title from Fuel and Fossil Operation to Fuel Service and the addition of Environmental Services both reporting to the Senior Vice President - Power Supply and Engineering. Modifications of this section also include the change in line reporting of Nuclear Licensing and Systems, Kewaunee Plant, and Nuclear Administration Groups to the Manager - Nuclear Power who in turn now reports to the Vice President - Power Production.

Figure TS 6.2-1 was modified to show the above title and organizational changes and also the title change of the Power Plant Design and Construction to include QA and the change in reportability from the Senior Vice President - Power Supply and Engineering to the Vice President - Power Production.

We have reviewed the above organizational and staffing changes and even though the Quality Assurance Group has been moved from reporting to the Senior Vice President - Power Supply and Engineering to the Vice President - Power Production, the group still remains at the same organization tier as the operating facility; therefore, the independence of the group is maintained. We find the above changes to be acceptable.

C. Procedure Administration and Commitment to ANSI Standards (pages 6-4 and 6-12)

Section 6.8.1 has been revised to commit to specified sections of ANSI N18.7-1976, in place of ANSI N18.7-1972. Section 6.8.2 concerning the review of procedures and procedure changes by the Plant Manager has been deleted and Section 6.8.3 concerning administration of procedure changes has been revised and the section number changed to 6.8.2.

The licensee's approved Operational Quality Assurance Program (OQAP) dated January 24, 1978 and revisions of June 10, 1983 and June 11, 1984 commit to ANSI N18.7-1976 with certain exceptions. This revision brings the TS into agreement with the OQAP. The later revision of ANSI N18.7 has been accepted by the NRC through Regulatory Guide 1.33 and found to provide an adequate basis for complying with the quality assurance program requirements of Appendix B to 10 CFR Part 50.

TS Section 6.8.2 concerning review of procedures has been deleted since ANSI N18.7-1976, Paragraph 5.2.15, specifies that each original procedure and any subsequent change will be reviewed by an individual knowledgeable in the area affected by the procedure and all procedures will be rereviewed at least every two years. The Standard also has provisions for the identification of individuals or organizations responsible for preparing, reviewing, approving, and issuing procedures. The Standard, Paragraph 5.2.2, specifies the requirements for making temporary procedure changes which clearly do not change the intent of the procedure. The paragraph specifies that at least one of the two knowledgeable members of the plant staff, required as a minimum to make procedure changes, be the supervisor in charge of the shift and an SRO. In the proposed TS Section 6.8.2, one of the two knowledgeable individuals must be an SRO but is not required to be the shift supervisor.

We concur that the TS Section 6.8.2 may be deleted since the review of all procedures and changes thereto are required to be reviewed by the Plant Operations Review Committee (PORC) and the Plant Manager is the Chairman of this Committee, Section 6.5.1.2 and 6.5.1.6. Therefore Paragraph 6.8.2 is redundant. We also agree that minor procedure changes may be initiated by an SRO other than the Shift Supervisor since these changes are also reviewed and approved by the PORC.

We find the above changes to be acceptable.

D. Clarification of Environmental Sampling (page 4-10-1 and Table TS 4.10-2)

Section 4.10.a has been modified to indicate that minor changes in sampling locations and description of sampling locations in the radiological environmental monitoring program is permitted.

Table TS 4.10-2 has been updated showing the correct location of eleven sampling points.

We concur that these minor changes are administrative in nature and do not adversely affect the sampling program. None of the changes represent a significant hazards concern.

E. Miscellaneous Descriptive Changes and Grammatical and Typographical Corrections (pages 3.1-7, 3.10-12, 6-1, and 6-2 and Tables TS 3.5-1 and 3.5-4)

Section 3.1.b Basis, heading Pressure Limits was changed to Pressurizer Limits.

Section 3.10 Basis, page 3.10-12, modification consisted of two grammatical changes and one descriptive change which clarify the basis.

Tables TS 3.5-1, item 5 and 3.5-4, item 2b, have been changed to correctly indicate that steam line isolation occurs at Lo-Lo Tave rather than at Low Tave.

Section 6.2.2 paragraph heading letters have been changed due to insertion of two new paragraphs and a typo corrected in Section 6.3.1.

The above changes were made to better describe the TS or are administrative in nature; therefore, we find them to be acceptable.

Environmental Consideration

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupation radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no

significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Sec 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

#### Conclusion

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: January 22, 1985

The following NRC personnel have contributed to this Safety Evaluation:

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