

February 23, 1995

Distribution w/encls:

Mr. C. A. Schrock
Manager - Nuclear Engineering
Wisconsin Public Service Corporation
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Docket File GH11(2)
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SUBJECT: AMENDMENT NO. 115 TO FACILITY OPERATING LICENSE NO. DPR-43 -
KEWAUNEE NUCLEAR POWER PLANT (TAC NO. M88942)

Dear Mr. Schrock:

The Commission has issued the enclosed Amendment No.115 to Facility Operating License No. DPR-43 for the Kewaunee Nuclear Power Plant (KNPP). This amendment revises the Technical Specifications (TS) in response to your application dated February 23, 1994.

The amendment revises TS 6.8.c by removing the requirement to conduct a biennial review of plant procedures in accordance with American National Standards Institute (ANSI) N18.7-1976, Section 5.2.15. Alternate programs that are described in the KNPP Operational Quality Assurance Program Description (OQAPD) will be used to ensure that procedures are reviewed and maintained current. These alternate programs were incorporated into the OQAPD with Revision 15, which was approved by the Region III office on January 27, 1995, in response to your request dated June 10, 1994, as supplemented on January 19, 1995.

A copy of the Safety Evaluation is also enclosed. Notice of issuance will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,
Original signed by Richard J. Laufer

Richard J. Laufer, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-305

- Enclosures: 1. Amendment No. 115 to License No. DPR-43
- 2. Safety Evaluation

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 23, 1995

Mr. C. A. Schrock
Manager - Nuclear Engineering
Wisconsin Public Service Corporation
Post Office Box 19002
Green Bay, WI 54307-9002

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Sincerely,

A handwritten signature in cursive script that reads "Richard J. Laufer".

Richard J. Laufer, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosures: 1. Amendment No. 115 to
License No. DPR-43
2. Safety Evaluation

cc w/encls: See next page

Mr. C. A. Schrock
Wisconsin Public Service Corporation

Kewaunee Nuclear Power Plant

cc:

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Mr. Harold Reckelberg, Chairman
Kewaunee County Board
Kewaunee County Courthouse
Kewaunee, Wisconsin 54216

Chairman
Public Service Commission of
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U. S. Nuclear Regulatory Commission
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Mr. Robert S. Cullen
Chief Engineer
Wisconsin Public Service Commission
P. O. Box 7854
Madison, Wisconsin 53707



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

WISCONSIN PUBLIC SERVICE CORPORATION

WISCONSIN POWER AND LIGHT COMPANY

MADISON GAS AND ELECTRIC COMPANY

DOCKET NO. 50-305

KEWAUNEE NUCLEAR POWER PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 115
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 licensees) dated February 23, 1994, 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:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 115, are hereby incorporated in the license. The licensees shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance, and is to be implemented within 30 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard J. Laufer, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of issuance: February 23, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 115

FACILITY OPERATING LICENSE NO. DPR-43

DOCKET NO. 50-305

Revise Appendix A Technical Specifications by removing the page identified below and inserting the enclosed page. The revised page is identified by amendment number and contains a vertical line indicating the area of change.

REMOVE

TS 6.8-1

INSERT

TS 6.8-1

6.8 PROCEDURES

- a. 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.
- b. Changes to procedures are made in accordance with the provisions of ANSI N18.7-1976 Section 5.2.2 except that temporary 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 an active SRO license at Kewaunee.
- c. Procedures are reviewed in accordance with the provisions of ANSI N18.7-1976, Section 5.2.15, however the biennial review requirement is accomplished through alternate programs as described in the OQAPD.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATING TO AMENDMENT NO. 115 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

1.0 INTRODUCTION

By letter dated February 23, 1994, Wisconsin Public Service Corporation (WPSC), the licensee, requested a revision to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS). The proposed amendment would revise TS 6.8.c by removing the requirement to conduct a biennial review of plant procedures in accordance with American National Standards Institute (ANSI) N18.7-1976, Section 5.2.15. Alternate programs that are described in the KNPP Operational Quality Assurance Program Description (OQAPD) would be used to ensure that procedures are reviewed and maintained current. These alternate programs were incorporated into the OQAPD with Revision 15 which was approved by the Region III office on January 27, 1995, in response to the licensee's request dated June 10, 1994, as supplemented on January 19, 1995.

2.0 EVALUATION

ANSI N18.7-1976, Section 5.2.15, states in part that "Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable."

KNPP TS 6.8.c currently states:

"Procedures are reviewed in accordance with the provisions of ANSI N18.7-1976, Section 5.2.15, except for procedures that are performed at a frequency interval of greater than every two years. Procedures performed at a frequency interval greater than every two years shall, instead, be reviewed prior to use or within the previous two years."

The licensee's proposed amendment would change TS 6.8.c to state:

"Procedures are reviewed in accordance with the provisions of ANSI N18.7-1976, Section 5.2.15, however the biennial review requirement is accomplished through alternate programs as described in the OQAPD."

In the proposal, the licensee states that the alternate programs it has in place makes a biennial review process unnecessarily duplicative. Since substantive changes to the plant procedures are being made on an as-needed basis, the additional biennial review is redundant, and is a significant drain on plant resources, without a commensurate improvement in plant safety. The alternate programs that the licensee uses include the following:

1. Technical Specification revision process

The licensee performs a review of the Procedural Implementation of Technical Specifications (PITS) list upon receipt of a TS amendment. The PITS list contains a cross reference of the TS line item and the implementing procedures. The responsible procedure reviewer is notified of any procedures identified in the PITS list that corresponds to the revised TS line item, and asked to review the procedure to see if a revision is necessary. As an additional precaution, all nuclear department heads are notified by letter upon receipt of a TS amendment. This letter notifies the department head that the amendment was received, and requests the department to review and revise all procedures affected by the TS amendment. Specific followups are conducted to ensure that any affected procedures are revised.

2. Design Change Program

As part of the design change process, a form is sent to all nuclear department heads notifying them of the modification and requiring them to identify any procedures needing revision, as a result of the modification. This practice will be augmented with specific followups conducted to ensure the identified procedures are revised.

3. Various Self-Assessment Programs

During internal Safety System Functional Inspections (SSFI), procedures relating to the particular system under inspection are reviewed. If a significant discrepancy is found in a procedure, a revision is submitted to the appropriate department head. Procedure discrepancies are resolved, including procedure revisions, before an SSFI open item can be closed.

The internal Operating Experience Assessment (OEA) program provides a methodology for the KNPP to review industry and in-house operating experience, and to ensure that lessons learned from the experience are translated into corrective actions to improve plant safety and reliability. In reviewing operating experiences, if a procedure revision is identified as a corrective action, this corrective action recommendation is made part of the procedure file. The procedure file is reviewed, and the procedure is updated prior to use.

4. Incident Report Process

An Incident Report is issued due to: 1) a failure of safety-related equipment; 2) a condition that is potentially reportable to the NRC; or 3) other non-consequential events that by themselves, or as a trend may identify weaknesses that could result in future significant events. Incident Reports are reviewed by the Plant Operations Review Committee. Any procedures which need revision must be revised before the Incident Report is closed out.

5. Quality Assurance Program

At least every two years, a surveillance will be performed whereby, randomly selected safety-related procedures would be checked for added assurance of timely revision of procedures.

6. Operating Experience Assessment Program

During operating experience assessment activities, procedures may be identified that contain significant discrepancies or require change. Revisions are made as appropriate. Significant changes to vendor manuals are evaluated as part of this program.

These alternate programs are described in the KNPP OQAPD, Revision 15, which also states that the licensee will implement measures specifying that infrequently scheduled plant procedures that have not been used or reviewed for two years, should be reviewed before use. The OQAPD also states that, due to their significance, the biennial review of the Integrated Plant Emergency Operating Procedures (IPEOP's) will continue.

The staff has reviewed the licensee's proposal and determined that the alternate programs described in the KNPP OQAPD are equally as effective, and more timely than the current biennial review requirement. The alternate programs ensure procedures are periodically reviewed, and maintained current when pertinent source material is revised, the plant design changes, and/or any deficiencies occur. The staff, therefore, finds the proposed TS change acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Wisconsin State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment changes recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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.

5.0 CONCLUSION

The staff has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: R. Laufer
J. Heller

Date: February 23, 1995