Docket No. 50-305 April 19, 1994

Mr. C. A. Schrock
Manager - Nuclear Engineering
Wisconsin Public Service
Corporation
Post Office Box 19002
Green Bay, Wisconsin 54037-9002

Dear Mr. Schrock:

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - CORRECTION TO SAFETY EVALUATION ASSOCIATED WITH AMENDMENT NO. 108 TO FACILITY OPERATING LICENSE NO. DPR-43 (TAC NOS. M77357 AND M77427)

On April 7, 1994, the Commission issued Amendment No. 108 for the Kewaunee Nuclear Power Plant in response to your application dated May 5, 1993, as supplemented on March 4, 1994.

The third paragraph on page four of the safety evaluation associated with this amendment contains a typographical error. The quote of Technical Specification (TS) 3.1.a.1.C erroneously references a temperature of 372 degrees F. The correct temperature should be 338 degrees F. The TS pages issued with this amendment were not affected by this error. A corrected safety evaluation, page four, is enclosed.

Please accept our apologies for any inconvenience this error may have caused.

Sincerely,

Original Signed By:

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

Enclosure:
Safety Evaluation page 4

cc w/enclosure:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Richard J. Laufer

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Project Directorate III-3
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

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Safety Evaluation page 4

cc w/enclosure:
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cc:

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P. O. Box 7854
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determination has been made that the attendant costs are justified in view of this increased protection. The technical findings and regulatory analysis related to Generic Issue 94 are discussed in NUREG-1326, "Regulatory Analysis for the Resolution of Generic Issue 94, Additional Low-Temperature Overpressure Protection for Light-Water Reactors."

The proposed TS changes in response to Generic Issue 94, "Additional Low-Temperature Overpressure Protection for Light-Water Reactors," consist of the following changes to TS 3.1, "Reactor Coolant System."

TS 3.1.a.1.C is being added and the associated bases are being supplemented. TS 3.1.a.1.C reads:

> "A reactor coolant pump shall not be started with one or more of the RCS cold leg temperatures less than or equal to 338 degrees F unless the secondary water temperature of each steam generator is less than 100 degrees F above each of the RCS cold leg temperatures."

This restriction on pump startup has been administratively enforced at Kewaunee. It is now being added to the TS to provide additional control to ensure that the limiting energy input transient assumed in the design basis of the LTOP system is not violated. The 100 degree F temperature difference restriction is part of the Kewaunee LTOP design basis which has been previously accepted by the staff. The inclusion of this restriction in the TS is consistent with the guidance provided in the GL and is therefore acceptable.

TS 3.1.b.4 is being added and the associated bases are being supplemented. This TS specifies that the LTOP system shall be operable whenever the RCS cold leg temperature is less than or equal to 338 degrees F. Operability is defined as: (1) having the Residual Heat Removal (RHR) system overpressure relief valve (RHR 33-1) set at less than or equal to 500 psig with the system aligned to the RCS by maintaining valves RHR 1A, 1B, 2A, and 2B open; or (2) by providing a vent pathway. This TS also specifies that with one flow path inoperable, the valves in the parallel flow path shall be verified open with the associated motor breakers for the valves locked in the off position. The inoperable flow path must be restored within 5 days or a complete depressurization and venting of the RCS shall be completed within an additional 8 hours. With both flow paths or RHR 33-1 inoperable, complete depressurization and venting of the RCS is required within 8 hours.

This proposed TS is consistent with the guidance provided in the GL for plants which do not use PORVs for LTOP with the exception of the allowable outage time (AOT) for an inoperable flowpath. The model STS provided with the GL specify a 7-day AOT for an inoperable PORV (LTOP flowpath) with RCS temperature greater than 200 degrees F (MODE 4) and a 24-hour AOT for an inoperable PORV (LTOP flow path) with RCS temperature less than 200 degrees F (MODES 5 and 6).

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