

November 30, 1994

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

Dear Mr. Schrock:

SUBJECT: AMENDMENT NO. 114 TO FACILITY OPERATING LICENSE NO. DPR-43 - KEWAUNEE NUCLEAR POWER PLANT (TAC NO. M87815)

The Commission has issued the enclosed Amendment No. 114 to Facility Operating License No. DPR-43 for the Kewaunee Nuclear Power Plant. This amendment revises the Technical Specifications (TS) in response to your application dated September 17, 1993, as supplemented August 31, 1994.

The amendment revises the TS by incorporating technical and administrative changes to TS 4.5, Emergency Core Cooling System and Containment Air Cooling System Tests; TS 4.7, Main Steam Isolation Valves; and Table TS 4.1-3, Minimum Frequencies for Equipment Tests. Changes have been made to the safety injection (SI) system automatic initiation test; the internal containment spray system (ICS) flow blockage test; the SI, ICS and residual heat removal pumps' periodic tests; the main steam isolation valves' test; and the periodic control rod functional test.

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. 114 to License No. DPR-43
 2. Safety Evaluation

cc w/encls: See next page

DOCUMENT NAME: G:\KEWAUNEE\KEW87815.AMD

PD3-3:LA	PD3-3:PM	OTSB:BC	PD3-3:PD	OGC
MRushbrook	RLaufer:g11	CGrimes	CCarpenter	S.Chilcote
10/11/94	10/11/94	10/26/94	11/30/94	11/1/94

NLO with minor comments

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

November 30, 1994

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

SUBJECT: AMENDMENT NO. 114 TO FACILITY OPERATING LICENSE NO. DPR-43 -
KEWAUNEE NUCLEAR POWER PLANT (TAC NO. M87815)

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The amendment revises the TS by incorporating technical and administrative changes to TS 4.5, Emergency Core Cooling System and Containment Air Cooling System Tests; TS 4.7, Main Steam Isolation Valves; and Table TS 4.1-3, Minimum Frequencies for Equipment Tests. Changes have been made to the safety injection (SI) system automatic initiation test; the internal containment spray system (ICS) flow blockage test; the SI, ICS and residual heat removal pumps' periodic tests; the main steam isolation valves' test; and the periodic control rod functional test.

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Sincerely,

A handwritten signature in cursive script, appearing to read "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. 114 to
License No. DPR-43
2. Safety Evaluation

cc w/encs: See next page

Mr. C. A. Schrock
Wisconsin Public Service Corporation

Kewaunee Nuclear Power Plant

cc:

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Kewaunee County Board
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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. 114
License No. DPR-43

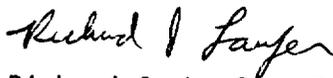
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Wisconsin Public Service Corporation, Wisconsin Power and Light Company, and Madison Gas and Electric Company (the licensees) dated September 17, 1993, as supplemented August 31, 1994, complies 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. 114, 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: November 30, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 114

FACILITY OPERATING LICENSE NO. DPR-43

DOCKET NO. 50-305

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change.

REMOVE

TS iii

TS 4.5-1 through
TS 4.5-5 (5 pages)

TS 4.7-1

Table TS 4.1-3
(2 pages)

INSERT

TS iii

TS 4.5-1
TS 4.5-2
TS B4.5-1
TS B4.5-2

TS 4.7-1
TS B4.7-1

Table TS 4.1-3
(2 pages)

<u>Section</u>	<u>Title</u>	<u>Page</u>
4.5	Emergency Core Cooling System and Containment Air Cooling System Tests	4.5-1
4.5.a	System Tests	4.5-1
4.5.a.1	Safety Injection System	4.5-1
4.5.a.2	Containment Vessel Internal Spray System	4.5-1
4.5.a.3	Containment Fan Coil Units	4.5-2
4.5.b	Component Tests	4.5-2
4.5.b.1	Pumps	4.5-2
4.5.b.2	Valves	4.5-2
4.6	Periodic Testing of Emergency Power System	4.6-1
4.6.a	Diesel Generators	4.6-1
4.6.b	Station Batteries	4.6-2
4.7	Main Steam Isolation Valves	4.7-1
4.8	Auxiliary Feedwater System	4.8-1
4.9	Reactivity Anomalies	4.9-1
4.10	Deleted	
4.11	Deleted	
4.12	Spent Fuel Pool Sweep System	4.12-1
4.13	Radioactive Materials Sources	4.13-1
4.14	Testing and Surveillance of Shock Suppressors (Snubbers)	4.14-1
4.15	Deleted	
4.16	Reactor Coolant Vent System Tests	4.16-1
4.17	Control Room Postaccident Recirculation System	4.17-1
5.0	Design Features	5.1-1
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5.2	Containment	5.2-1
5.2.a	Containment System	5.2-1
5.2.b	Reactor Containment Vessel	5.2-2
5.2.c	Shield Building	5.2-2
5.2.d	Shield Building Ventilation System	5.2-2
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5.3	Reactor	5.3-1
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6.0	Administrative Controls	6.1-1
6.1	Responsibility	6.1-1
6.2	Organization	6.2-1
6.2.a	Off-Site Staff	6.2-1
6.2.b	Facility Staff	6.2-1
6.2.c	Organizational Changes	6.2-2
6.3	Plant Staff Qualifications	6.3-1
6.4	Training	6.4-1

4.5 EMERGENCY CORE COOLING SYSTEM AND CONTAINMENT AIR COOLING SYSTEM TESTS

APPLICABILITY

Applies to testing of the Emergency Core Cooling System and the Containment Air Cooling System.

OBJECTIVE

To verify that the subject systems will respond promptly and perform their design functions, if required.

SPECIFICATION

a. System Tests

1. Safety Injection System

- A. System tests shall be performed once per operating cycle or once every 18 months, whichever occurs first. With the Reactor Coolant System pressure ≤ 350 psig and temperature $\leq 350^\circ\text{F}$, a test safety injection signal will be applied to initiate operation of the system. The safety injection and residual heat removal pumps need not be operated for this test.
- B. The test will be considered satisfactory if control board indication or visual observations indicate that all components have received the safety injection signal in the proper sequence and timing. That is, the appropriate pump motor breakers shall have opened and closed, and all valves shall have completed their travel.

2. Containment Vessel Internal Spray System

- A. System tests shall be performed once every operating cycle or once every 18 months, whichever occurs first. The test shall be performed with the isolation valves in the supply lines at the containment blocked closed.
- B. Verify a minimum of 76 spray nozzles per train are functioning properly by using an air or smoke test at a test interval not to exceed 10 years.
- C. The test will be considered satisfactory if control board indications or visual observations indicate all components have operated satisfactorily.

3. Containment Fancoil Units

Each fancoil unit shall be tested once every operating cycle or once every 18 months, whichever occurs first, to verify proper operation of the motor-operated service water outlet valves and the fancoil emergency discharge and associated backdraft dampers.

b. Component Tests

1. Pumps

- A. The safety injection pumps, residual heat removal pumps, and containment spray pumps shall be started and operated quarterly during power operation and within 1 week after the plant is returned to power operation, if the test was not performed during plant shutdown.
- B. Acceptable levels of performance are demonstrated by the pumps' ability to start and develop head within an acceptable range.

2. Valves

- A. The Refueling Water Storage Tank and containment sump outlet valves shall be tested in performing the pump tests.
- B. The accumulator check valves shall be checked for OPERABILITY during each major REFUELING outage. The accumulator block valves shall be checked to assure "valve open" requirements during each major REFUELING outage.
- C. The boric acid tank isolation valves to the safety injection pumps shall be tested at intervals not to exceed quarterly during power operation.
- D. Spray additive tank valves shall be tested during each major REFUELING outage.
- E. Closing of the boric acid tank isolation valves and concurrent opening of Refueling Water Storage Tank valves upon receipt of simulated lo-to boric acid tank level signal shall be tested at intervals not to exceed quarterly during power operation.
- F. Residual Heat Removal System valve interlocks shall be tested once per operating cycle (not to exceed 18 months).

BASIS

System Tests (TS 4.5.a)

The Safety Injection System and the Containment Vessel Internal Spray System are principal plant safety systems that are normally in standby during reactor operation. Complete systems tests cannot be performed when the reactor is OPERATING because a safety injection signal causes containment isolation, and a Containment Vessel Internal Spray System test requires the system to be temporarily disabled. The method of assuring OPERABILITY of these systems is therefore to combine system tests to be performed during periodic shutdowns with more frequent component tests, which can be performed during reactor operation.

The systems tests demonstrate proper automatic operation of the Safety Injection and Containment Vessel Internal Spray Systems. A test signal is applied to initiate automatic action, resulting in verification that the components received the safety injection signal in the proper sequence. The test demonstrates the operation of the valves, pump circuit breakers, and automatic circuitry.⁽¹⁾

The Internal Containment Spray (ICS) System is designed to provide containment cooling in the event of a loss-of-coolant accident or steam line break, thereby ensuring the containment pressure does not exceed its design value of 46 psig at 268°F (100% R.H.).⁽²⁾ To ensure adequate cooling is available, calculations were performed to determine the ICS flow rate necessary to provide post-accident cooling. These calculations showed that a flow rate of 1300 gpm provides the required cooling capabilities for one train. With the KNPP system design, 76 properly functioning spray nozzles per train will adequately provide the required flow rate of 1300 gpm per train.

Component Tests - Pumps (TS 4.5.b.1)

During reactor operation, the instrumentation which is depended upon to initiate safety injection and containment spray is checked daily and the initiating logic circuits are tested monthly (in accordance with TS 4.1). In addition, the active components (pumps and valves) are to be tested quarterly to check the operation of the starting circuits and to verify that the pumps are in satisfactory running order. The quarterly test interval is based on the judgment that more frequent testing would not significantly increase the reliability (i.e., the probability that the component would operate when required), yet more frequent testing would result in increased wear over a long period of time.

⁽¹⁾USAR Section 6.2

⁽²⁾USAR Section 6.4

Component Tests - Valves (TS 4.5.b.2)

Closure of the boric acid tank isolation valves is tested with a simultaneous opening of the Refueling Water Storage Tank valves upon receipt of simulated lo-lo boric acid tank level signal. This test is performed to verify proper operation to prevent inadvertent spillage of Refueling Water Storage Tank water through the boric acid tank should the isolation valves fail to close.

Testing of the containment fancoil unit emergency discharge and backdraft dampers is performed to assure the integrity of the duct work post-LOCA.

Other systems that are also important to the emergency cooling function are the accumulators, the Component Cooling System, and the Service Water System. The accumulators are a passive safety feature. In accordance with TS 4.1, the water volume and pressure in the accumulators are checked each shift. The other systems mentioned operate when the reactor is in operation and by these means are continuously monitored for satisfactory performance.

4.7 MAIN STEAM ISOLATION VALVES

APPLICABILITY

Applies to periodic testing of the main steam isolation valves.

OBJECTIVE

To verify the ability of the main steam isolation valves to close upon signal.

SPECIFICATION

The main steam isolation valves shall be tested once per operating cycle (not to exceed 18 months). A closure time of 5 seconds or less shall be verified.

BASIS

The main steam isolation valves (MSIVs) serve to limit the cooldown rate of the Reactor Coolant System and the reactivity insertion that could result from a main steam break incident. Their ability to close upon signal should be verified at each major REFUELING outage. The USAR assumes a MSIV closure time of 10 seconds⁽¹⁾ for a steamline break accident scenario. However, a closure time of 5 seconds is selected for the TS requirements, since it is more consistent with expected response time for instrumentation as detailed in the steam line break⁽¹⁾ incident analysis.

⁽¹⁾USAR Section 14.2.5

TABLE TS 4.1-3

MINIMUM FREQUENCIES FOR EQUIPMENT TESTS

EQUIPMENT TESTS ⁽¹⁾	TEST	FREQUENCY	MAXIMUM TIME BETWEEN TEST (DAYS)
1. Control Rods	Rod drop times of all full length rods	Each REFUELING outage	N.A.
	Partial movement of all rods not fully inserted in the core	Every 2 weeks when at or above HOT STANDBY	17
1a. Reactor Trip Breakers	Independent test ⁽²⁾ shunt and undervoltage trip attachments	Monthly	37
1b. Reactor Coolant Pump Breakers-Open-Reactor Trip	OPERABILITY	Each REFUELING outage	N.A.
1c. Manual Reactor Trip	Open trip reactor ⁽³⁾ trip and bypass breaker	Each REFUELING outage	N.A.
2. Deleted			
3. Deleted			
4. Containment Isolation Trip	OPERABILITY	Each REFUELING outage	N.A.
5. Refueling System Interlocks	OPERABILITY	Prior to fuel movement each REFUELING outage	N.A.
6. Deleted			

⁽¹⁾Following maintenance on equipment that could affect the operation of the equipment, tests should be performed to verify OPERABILITY.

⁽²⁾Verify OPERABILITY of the bypass breaker undervoltage trip attachment prior to placing breaker into service.

⁽³⁾Using the Control Room push-buttons, independently test the reactor trip breakers shunt trip and undervoltage trip attachments. The test shall also verify the undervoltage trip attachment on the reactor trip bypass breakers.

TABLE TS 4.1-3

MINIMUM FREQUENCIES FOR EQUIPMENT TESTS

EQUIPMENT TESTS	TEST	FREQUENCY	MAXIMUM TIME BETWEEN TEST (DAYS)
7. Deleted			
8. RCS Leak Detection	OPERABILITY	Weekly	8
9. Diesel Fuel Supply	Fuel Inventory ⁽⁴⁾	Weekly	8
10. Turbine Stop and Governor Valves	OPERABILITY	Annually	365
11. Fuel Assemblies	Visual Inspection	Each REFUELING outage	N.A.
12. Guard Pipes	Visual Inspection	Each REFUELING outage	N.A.
13. Pressurizer PORVs	OPERABILITY	Each REFUELING cycle	N.A.
14. Pressurizer PORV Block Valves	OPERABILITY	Quarterly ⁽⁵⁾	N.A.
15. Pressurizer Heaters	OPERABILITY ⁽⁶⁾	Each REFUELING cycle	N.A.
16. Containment Purge and Vent Isolation Valves	OPERABILITY ⁽⁷⁾	Each REFUELING cycle	N.A.

⁽⁴⁾See TS 4.1.d.

⁽⁵⁾Not required when valve is administratively closed.

⁽⁶⁾Test will verify OPERABILITY of heaters and availability of an emergency power supply.

⁽⁷⁾This test shall demonstrate that the valve(s) close in ≤ 5 seconds.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATING TO AMENDMENT NO. 114 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 September 17, 1993, as supplemented August 31, 1994, the Wisconsin Public Service Corporation (WPSC), the licensee, submitted a request for revision to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS). The proposed amendment would revise the TS by incorporating technical and administrative changes to TS 4.5, Emergency Core Cooling System (ECCS) and Containment Air Cooling System Tests; TS 4.7, Main Steam Isolation Valves; and Table TS 4.1-3, Minimum Frequencies for Equipment Tests. Changes are proposed for the safety injection (SI) system automatic initiation test; the internal containment spray system (ICS) flow blockage test; the SI, ICS and residual heat removal (RHR) pumps' periodic tests; the main steam isolation valves' test; and the periodic control rod functional test.

2.0 EVALUATION

TS 4.5.a.1.A

The intent of the SI system test specified by TS 4.5.a.1.A is to demonstrate, on a periodic basis, the proper automatic operation of ECCS components. To verify proper automatic operation of the SI and RHR components, a test signal is applied to initiate automatic action and to verify that components receive the SI signal in the proper sequence.

The purpose of the licensee's proposed change is to clarify the wording of TS 4.5.a.1.A to allow the option of operating the SI and RHR pumps during the SI system automatic initiation test. The existing TS wording states that "The safety injection and residual heat removal pumps are not operated during this test." This wording was presumably intended to ensure understanding that the operation of the pumps was not a prerequisite condition nor acceptance requirement for the test. Verifying that the appropriate pump motor breakers have opened and closed, as stated in TS 4.5.a.1.B, provides adequate demonstration that these components received the SI signal in the proper sequence.

The licensee proposes to change TS 4.5.a.1.A to read "The safety injection and residual heat removal pumps need not be operated for this test." This change clarifies that the pumps may be operated during the SI system automatic initiation test. Operation of the pumps during the actuation logic test will provide an equivalent method for determining proper component actuation. Since overpressurization protection is provided, start and operation of these pumps during the actuation logic test will not unnecessarily challenge the components.

Based on the above discussion, and since starting the pump during testing is consistent with the requirements of NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," the staff finds this proposed TS change acceptable.

TS 4.5.a.2.B

The intent of TS 4.5.a.2.B is to ensure that the required number of ICS spray flow nozzles are capable of proper functioning upon demand. The TS currently states:

"The spray nozzles shall be checked for proper functioning at least every five years using either air with telltales or smoke tests to determine that all nozzles are clear."

The licensee proposes to change TS 4.5.a.2.B to read as follows:

"Verify a minimum of 76 spray nozzles per train are functioning properly by using an air or smoke test at a test interval not to exceed 10 years."

These changes affect two requirements of the existing TS. These requirements are:

1) The requirement to determine that "all," i.e., 100%, of the installed 168 spray nozzles are unobstructed is being removed. Of the 168 nozzles (2 trains with 84 nozzles per train) provided by design, only 76 nozzles per train are required to provide adequate containment cooling, iodine scrubbing, and caustic addition in the event of a postulated accident. The existing TS, by requiring that "all" nozzles are clear, does not acknowledge the overdesign of the system. The staff, therefore, finds this change acceptable.

2) The frequency for checking the spray nozzles is being changed from at least every 5 years to at least every 10 years. This change is supported by Kewaunee operating experience and is consistent with the guidance provided in Generic Letter (GL) 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation," dated September 27, 1993. The staff, therefore, finds this proposed change acceptable.

TS 4.5.b.1.B

The intent of the test specified by TS 4.5.b.1.B is to demonstrate operability of the SI, RHR and ICS pumps and to detect degradation of the component. This testing may be accomplished by measuring the pump's developed head at one point on the pump's characteristic curve. This testing verifies measured performance is within acceptable limits of pump baseline performance.

The TS currently states that "Acceptable levels of performance shall be that the pumps start, reach their required developed head at miniflow, and operate for at least fifteen minutes on the miniflow line." When this TS was originally developed, there were only miniflow test lines available to perform these tests periodically with the plant at power.

During the 1991 refueling outage, the ICS system was modified to accommodate full flow testing of the ICS pumps during power operation. This ICS system modification involved the installation of a full flow test line leading to the discharge piping of the refueling water storage tank (RWST). Installation of the full flow test line provided enhanced pump performance test capability and the ability to satisfy the check valve test requirements in Section XI of the ASME Boiler and Pressure Vessel Code through full flow testing in lieu of disassembly and inspection as allowed by Generic Letter 89-04.

Since completion of the 1991 ICS system modification, redundant tests of the ICS pumps have been conducted at quarterly intervals due to the existing wording of the TS. To demonstrate compliance with the existing requirements of TS 4.5.b.1.B, the ICS pumps are being tested on the miniflow line for greater than 15 minutes. To demonstrate compliance with the ASME Section XI check valve test requirements, the ICS pumps are also being tested on the full flow test line on a quarterly basis.

The licensee's proposal would change the TS to state that "Acceptable levels of performance are demonstrated by the pumps' ability to start and develop head within an acceptable range."

This TS change would allow the flexibility for the full flow test to satisfy the requirements of Section XI and to meet the intent of the existing TS with one test. Based on the above discussion, the staff finds this proposed TS change acceptable.

TS 4.5 Administrative Changes

The licensee's proposal included a number of formatting changes and corrections of minor typographical errors. Among the formatting changes is a proposal to renumber the pages of the basis section. These changes are being proposed in conjunction with converting the TS document over to the WordPerfect software now being used by the licensee.

The staff has reviewed the changes discussed above and, since they are administrative in nature, and do not alter the intent or interpretation of the TS, the staff finds them acceptable.

TS 4.7

TS 4.7 currently states:

"The main steam isolation valves shall be tested once per operating cycle (not to exceed 18 months), at major outages with the reactor at cold shutdown. A closure time of five seconds or less shall be verified."

The licensee's proposal would change TS 4.7 to state:

"The main steam isolation valves shall be tested once per operating cycle (not to exceed 18 months). A closure time of five seconds or less shall be verified."

The current TS has been interpreted by the licensee to require that the MSIV closure time be verified at cold shutdown conditions, i.e., reactor coolant system temperature less than or equal to 200 °F. The proposed TS allows the MSIV surveillance to be performed during plant conditions that are more similar to the expected conditions in which MSIV actuation would be required. Additionally, Section XI of the ASME Boiler and Pressure Vessel Code requires the same MSIV closure time test be performed at hot shutdown conditions with the reactor coolant system at operating temperature and pressure.

This proposed TS would allow one test to satisfy both the ASME and the TS requirements, thus eliminating a repetitive test. Based on the above discussion, and since the proposed TS is consistent with the requirements of NUREG-0452, the staff finds it acceptable.

TABLE TS 4.1-3

The intent of the test specified in Table TS 4.1-3 item 1 is to demonstrate that the control rods are operable and capable of performing their safety-related function of negative reactivity insertion during Updated Safety Analysis Report (USAR) analyzed events. The requirement to periodically exercise the rods provides assurance of their capability to insert into the core during a reactor trip or other conditions requiring rod movement.

The TS currently requires partial movement of all control rods at a frequency of every two weeks. The licensee proposes changing the TS requirement to partial movement of all rods not fully inserted in the core, at a frequency of every two weeks, when at or above hot standby.

Only control rods which are partially or fully withdrawn need to be tested since these rods are being used to control reactor power and ensure adequate shutdown margin. Control rods fully inserted into the core are already performing their safety-related function; therefore, additional assurance of operability is not required. Based on the above discussion, and since this proposed change is consistent with the requirements of NUREG-0452, the staff finds it 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 a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluent that may be released offsite and that there is no significant increase in individual or cumulative occupational 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 (59 FR 2874). Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 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.

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 Contributor: R. Laufer

Date: November 30, 1994