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Kewaunee / Point Beach Nuclear
Operated by Nuclear Management Company, LLC

NRC-02-032

April 17, 2002

10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 183 to the Kewaunee Nuclear Power Plant Technical Specifications

The Nuclear Management Company (NMC) is submitting this proposed amendment (PA) to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS) to revise Section 6.3, "Plant Staff Qualifications," to reflect the title change from Superintendent Plant Radiation Protection to Radiation Protection Manager. In addition, TS Section 6.3 will be converted to WORD format as part of a continuing effort to standardize KNPP's Technical Specifications.

Attachment 1 to this letter contains a description, a safety evaluation, a significant hazards determination and environmental considerations for the proposed changes. Attachment 2 contains the strike-out Technical Specification page: TS 6.3-1. Attachment 3 contains the affected Technical Specification page as revised: TS 6.3-1.

In accordance with the requirements of 10 CFR 50.30(b), this submittal has been signed and notarized. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

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To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects, these statements are not based entirely on my personal knowledge, but on information furnished by cognizant NMC employees and consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on April 17, 2002.

A handwritten signature in black ink, appearing to read "Mark E. Warner". The signature is fluid and cursive, with a prominent initial "M" and a long, sweeping underline.

Mark E. Warner
Site Vice President

DAK

Attachments

cc - US NRC - Region III
US NRC Senior Resident Inspector
Electric Division, PSCW

ATTACHMENT 1

Letter from M. E. Warner (NMC)

to

Document Control Desk (NRC)

Dated

April 17, 2002

Proposed Amendment 183

Description of Proposed Changes

Safety Evaluation

Significant Hazards Determination

Environmental Considerations

Description of Proposed Changes

An administrative change is being proposed to TS 6.3.a to revise the title of Superintendent Plant Radiation Protection to Radiation Protection Manager. This change is being made to more accurately reflect the industry standard title for the position. The proposed change will not affect or alter the responsibilities or duties of the position.

In addition, TS Section 6.3 will be converted to WORD format as part of a continuing effort to standardize KNPP's Technical Specifications.

Safety Evaluation for Proposed Changes

The proposed changes are administrative in nature, and therefore, have no safety significance. The revisions will not lower the safety or effectiveness of the organization. The title change from Superintendent Plant Radiation Protection to Radiation Protection Manager does not change the intent of the Technical Specifications or the responsibilities of the position described.

The conversion of TS Section 6.3 to WORD format is strictly for standardization and does not affect the intent or interpretation of the TS.

Significant Hazards Determination for Proposed Changes

The proposed changes were reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed changes will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes will not alter the intent of the TS. Reformatting TS Section 6.3 is administrative. Changing the title from Superintendent Radiation Protection to Radiation Protection Manager is also administrative in nature. There is no impact on accident initiators or plant equipment, and thus does not affect the probability or consequences of an accident.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not involve a change to the physical plant or operations. Since these are administrative changes they do not contribute to accident initiation. Therefore, they do not produce a new accident scenario or produce a new type of equipment malfunction.

3. Involve a significant reduction in the margin of safety.

Since these are administrative changes, they do not involve a significant reduction in the margin of safety. The proposed changes do not affect plant equipment or operation. Safety limits and limiting safety system settings are not affected by this change.

Environmental Considerations

NMC has determined that this proposed amendment involves no significant hazards considerations and no significant change in the types of any effluents that may be released off-site and that there is no significant rise in individual or cumulative occupational radiation exposure. Accordingly, this proposed 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 this amendment.

ATTACHMENT 2

Letter from M. E. Warner (NMC)

To

Document Control Desk (NRC)

Dated

April 17, 2002

Proposed Amendment 183

Strike-Out TS Page:

TS 6.3-1

6.3 PLANT STAFF QUALIFICATIONS

- a. 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 ~~Superintendent Plant Radiation Protection~~ Radiation Protection Manager 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.
- b. 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.

ATTACHMENT 3

Letter from M. E. Warner (NMC)

To

Document Control Desk (NRC)

Dated

April 17, 2002

Proposed Amendment 183

TS Page:

TS 6.3-1

6.3 PLANT STAFF QUALIFICATIONS

- a. 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 Manager 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.
- b. 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.