

May 3, 2002

Mr. Mark Warner
Site Vice President
Kewaunee and Point Beach Nuclear Power Plants
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL
INFORMATION RELATED TO REQUEST FOR PROPOSED AMENDMENT TO
REVISE KEWAUNEE NUCLEAR POWER PLANT TECHNICAL SPECIFICATION
SECTION 3.10.f (TAC NO. MB3825)

Dear Mr. Warner :

By letter dated January 14, 2002, Nuclear Management Company, LLC (NMC or the licensee) submitted a request for a proposed amendment to revise Kewaunee Nuclear Power Plant Technical Specifications Section 3.10.f. The proposed amendment requests an allowed outage time for the Individual Rod Position Indicator (IRPI) system of 24 hours with more than one IRPI per group inoperable.

The Nuclear Regulatory Commission (NRC) staff finds that the additional information identified in the enclosure is needed.

A draft of the request for additional information was e-mailed to Mr. G. Riste (NMC) on April 11, 2002.

A phone call was held between G. Riste (NMC), T. Maloney (NMC), S. Peters (NRC), and myself on April 19, 2002, to discuss the questions to ensure that there was no misunderstanding. Also, the phone call established a mutually agreeable response date of 30 days from the date of this letter.

Please contact me at (301) 415-1446 if future circumstances should require a change in this response date.

Sincerely,

/RA/

John G. Lamb, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION REGARDING

REQUEST FOR PROPOSED AMENDMENT TO KEWAUNEE NUCLEAR POWER PLANT

TECHNICAL SPECIFICATIONS (TSs) SECTION 3.10.f

(TAC NO. MB3825)

1. With one rod position indicator channel inoperable, the current TS 3.10.f.1.A requires the determination of position of the rod cluster control, "... at least once per 8 hours, or subsequent to rod motion exceeding a total displacement of 24 steps, whichever occurs first." This TS implies that, following rod displacement, an immediate check of the rod position is required, i.e. prior to the 8 hours already in effect. However, the proposed TSs would require an inspection within 8 hours following the same rod displacement. Describe the safety significance of this change. Why is it acceptable to set 8 hours as an inspection time when a more immediate requirement was set in the original TSs?
2. It is our understanding that Kewaunee's Final Safety Analysis Report (FSAR) Section 7.3.2, "System Design," refers to the control rod demand position indication system as the "Digital System." In reference to the Digital System, Kewaunee's FSAR states:

"The digital and analog systems are separate systems; each serves as backup for the other. Operating procedures require the reactor operator to compare the digital and analog readings upon receiving a rod deviation alarm. Therefore, a single-failure in rod position indication does not in itself lead the operator to take erroneous action in the operation of the reactor."

10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants", Criterion 13, "Instrumentation and Control," states that instrumentation to monitor variables and systems over their operating ranges during normal operation, anticipated operational occurrences, and accident conditions must be operable. In conjunction with this definition of instrumentation, NUREG-1431 Vol.1, Rev. 2, "Standard Technical Specifications Westinghouse Plants," TS 3.1.7, "Rod Position Indication" indicates that the Demand Position Indication System shall be operable.

However, it is our understanding that the proposed TSs do not contain requirements for the Digital System (Demand Position Indication System) to be operable. Given that both GDC 13 and NUREG-1431 indicate that the digital system shall be operable, and that the digital system operability is required to prevent erroneous action as a result of a single-failure, explain why it is acceptable in the proposed TSs to exclude the conditions of NUREG-1431, TS 3.1.7.D, which require demand position indicator operability.

ENCLOSURE