NMC
Committed to Nuclear Excellence

Kewaunee Nuclear Power Plant
N490 Highway 42
Kewaunee, WI 54216-9511
920.388.2560

Point Beach Nuclear Plant
6610 Nuclear Road
Two Rivers, WI 54241
920.755.2321

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

NRC-02-054

10 CFR 50.90

July 12, 2002

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
Response to Nuclear Regulatory Commission request for additional information regarding Kewaunee Nuclear Power Plant proposed amendment 181.

References: 1) NRC letter from John Lamb (NRC) to Mark Warner (NMC), "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), dated May 3, 2002.

Attached is the Nuclear Management Company, LLC (NMC), response to a United States Nuclear Regulatory Commission Request for Additional Information (Reference 1) regarding the NMC application for permission to change Kewaunee Technical Specification 3.10.f on the allowed outage time for the Rod Position Indicator (RPI) system. Based on a telephone conversation between Mr. Jerry Riste of my staff, Mr. John Lamb, and Mr. Shawn Peters of the NRC staff on June 17, 2002, at which time the due date for this response was extended.

If there are questions regarding this response, please contact either Mr. Jerry Riste at (920) 388-8424 or me at (920) 755-7611.

A001

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.

T. L. Lewis for Mark Warner

Mark E. Warner
Site Vice President

TLM

Attach.

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

July 12, 2002

NMC Response to NRC's

REQUEST FOR ADDITIONAL INFORMATION
TECHNICAL SPECIFICATION SECTION 3.10.f AMENDMENT FOR
INDIVIDUAL ROD POSITION INDICATOR SYSTEM ALLOWED OUTAGE TIME
KEWAUNEE NUCLEAR POWER PLANT

NRC REQUEST 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?

NMC RESPONSE TO REQUEST 1:

After reviewing the documentation and details of the NRC question, we have concluded that a change should be made to our original submittal. NMC will be following the guidance of standard Technical Specifications 3.1.7.C.1 by using the Completion Time of 4 hours to verify rod position in the event of rod movement in excess of 24 steps when the IRPI is inoperable. This modification will be in a separate submittal.

NRC REQUEST 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 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.

NMC RESPONSE TO REQUEST 2:

NMC has reviewed the issue concerning the control rod demand position indication system and agrees that demand position should be added. NMC will be adding Demand position requirements to our TS and submitting a revised LAR.