

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-02-085 10 CFR 50.90

September 11, 2002

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

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 180b Application For Technical Specification Change Regarding Missed
Surveillance (and Adoption of a Technical Specifications Bases Control Program) Using The
Consolidated Line Item Improvement Process

- Reference 1. Letter from Mark E. Warner (NMC) to Document Control Desk (NRC), dated May 7, 2002, "Proposed Amendment 180 Application For Technical Specification Change Regarding Missed Surveillance (and Adoption of a Technical Specifications Bases Control Program) Using The Consolidated Line Item Improvement Process."
  - Letter from Mark E. Warner (NMC) to Document Control Desk (NRC), dated July 19, 2002, "Proposed Amendment 180a Application For Technical Specification Change Regarding Missed Surveillance (and Adoption of a Technical Specifications Bases Control Program) Using The Consolidated Line Item Improvement Process."

In reference 1 and 2, NMC requested changes to Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS). During subsequent discussions with the NRC, several enhancements and one typographical error were identified. The purpose of this letter is to submit the TS pages which include the improvement to the Proposed Amendment (PA). These changes do not affect the significant hazards consideration determination or the environmental evaluation of the referenced 1.

100/

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#### The corrections are as follows:

- 1. Technical Specification 6.21.b is modified to remove the phrase "Licensees may make", because this is understood in the TS process.
- 2. Technical Specification 6.21.d is modified to correct an error where the TS refers to TS 6.5.b, which does not exist. TS 6.5.b was corrected to read TS 6.21.b.1 and TS 6.21.b.2.
- 3. The first sentence of TS 6.21.d was removed and made its own item, TS 6.21.c, for clarity.
- 4. Technical Specification 6.21.d is modified to change the requirement that TS Bases changes be provided to the NRC in accordance with 10 CFR 50.71(e). KNPP practice is to submit these changes as they are approved. This change will allow NMC to submit the Bases changes on this frequency not to exceed the frequency of 10 CFR 50.71(e).
- 5. TS 6.21.c and TS 6.21.d were renumbered to TS 6.21.d and TS 6.21.e respectively.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 11, 2002.

Thomas Coutu

Site Vice President

Kewaunee Nuclear Power Plant

#### **GOR**

Attachments:

- Strikeout Technical Specification Pages

2 - Affected Technical Specification Pages

cc:

US NRC Region III

US NRC Senior Resident Inspector

Electric Division, PSCW

# **ATTACHMENT 1**

To

Letter from Thomas Coutu (NMC)

To

Document Control Desk (NRC)

Dated

September 11, 2002

Proposed Amendment 180b

Strikeout TS Pages:

TS 6.21-1

## 6.21 TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM

The Bases Control Program shall be established, implemented and maintained. This program provides a means for processing changes to the bases of these Technical Specifications

- a. Changes to the bases of the TS shall be made under appropriate administrative controls and reviews.
- <u>b. Changes to bases may be made without prior NRC approval provided the changes do not require either of the following:</u>
  - 1. A change in the TS incorporated in the license.
  - 2. A change to the USAR or bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. Proposed changes that meet the criteria of 6.21.b.1 and 6.21.b.2 above shall be reviewed and approved by the NRC prior to implementation.
- d. The Bases Control Program shall contain provisions to ensure that the bases are maintained consistent with the USAR.
- e. Changes to the bases implemented without prior NRC approval shall be provided to the NRC on a frequency not to exceed that of 10 CFR 50.71(e).

## **ATTACHMENT 2**

To

Letter from Thomas Coutu (NMC)

To

Document Control Desk (NRC)

Dated

September 11, 2002

Proposed Amendment 180b

Affected TS Pages:

TS 6.21-1

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- d. The Bases Control Program shall contain provisions to ensure that the bases are maintained consistent with the USAR.
- e. Changes to the bases implemented without prior NRC approval shall be provided to the NRC on a frequency not to exceed that of 10 CFR 50.71(e).