

**From:** John Lamb  
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**Date:** 10/31/2002 10:40:22 AM  
**Subject:** COLR Amendment Draft RAIs

Gerry,

The following are the draft RAIs for the COLR proposed amendment for Kewaunee:

1. Your proposed TS 1.0.r.b, "Shutdown Margin (SDM)," states that the SDM is calculated assuming the fuel and moderator temperatures are changed to the program temperature. NUREG-1431, Vol. 1, Rev. 2, "Standard Technical Specifications, Westinghouse Plants," on the other hand, states that the SDM should be calculated assuming the temperatures are changed to the "nominal zero power design level." What is the difference between "program temperature" and "nominal zero power design level?" If there is a difference, why is it acceptable to use "program temperature" for establishing SDM?
2. In TS 2.1, "Safety Limits, Reactor Core," you added peak fuel centerline limits. NUREG-1431 and WCAP-14483-A, "Generic Methodology for Expanded Core Operating Limits Report," both suggest using a peak fuel centerline temperature adjusted for fuel burnup. How did you determine your proposed limit of 4700oF and why is this value acceptable? Also, up to what levels of fuel burnup did you account for when determining this value?
3. WCAP-14483-A requires that the COLR analytical methods be provided in your TSs. What analytical method did you use to calculate the OTDT and OPDT trip setpoints? Is this method included in your TSs? Are there any required analytical methods missing from your proposed TSs?
4. NUREG-1431 shows that the maximum upper limit for Moderator Temperature Coefficient (MTC) needs to be included in the TSs. Your proposed TS 3.1.f.3 does not include this limit. Why is this proposal acceptable?
5. Your proposed Figure 2 of the COLR does not match the original Figure TS 3.10-1. Specifically, the required shutdown reactivity at 0 full power equilibrium boron concentration increased from 2000 pcm to 2200 pcm. Why is this change acceptable? Did you perform a 50.59 evaluation for this change?
6. Kewaunee TS 3.8.a.5, "Refueling Operations," requires that a shutdown margin of greater than 5% Dk/k be maintained during refueling operations. However, you did not retain this requirement in your proposed COLR. Explain why this omitting this value from the COLR is acceptable.

Please let me know when you are available to discuss the draft RAIs via a conference call.

John