

Kewaunee Nuclear Power Plant  
Proposed Amendment 181 (TAC NO. MB3825)  
RORP/TSS RAIs

The NMC (licensee) submitted a proposed Kewaunee Nuclear Power Plant (KNPP) license amendment to replace current TS 3.10.f in its entirety with TS modeled after NUREG-1431, Technical Specifications Westinghouse Plants (Rev. 2). The licensee stated that the proposed amendment provides an allowed outage time (AOT) for the Individual Rod Position Indicator (IRPI) system of 24 hours with more than one IRPI per group inoperable. The TS did not previously have an explicit AOT for this condition. In response to a May 3, 2002 NRC request for additional information, the licensee revised TS completion times for verifying the positions of rods with inoperable position indicators and added operability requirements for the Demand Position Indication System to match the requirements specified in NUREG-1431, Rev. 2.

RAI #1

The proposed TS changes result in significant format differences from current TS. The proposed format of LCO 3.10.f permits separate completion time clocks to be started for each inoperable rod position indicator and for each demand position indicator. LCO 3.10.f also uses logical connectors in the LCO Required Actions and Completion Times. The concepts of completion time clocks and use of logical connectors to establish TS requirements is presented in NUREG-1431 Section 1.0, "Use and Application". The purpose of this section is to explain the meaning and establish conventions for the use of the NUREG-1431 TS format. The licensee does not propose to adopt this section of NUREG-1431. Provide plant-specific analysis to show that the proposed TS will not result in unacceptable application of proposed TS limits.

RAI #2

The proposed Actions Notes specify alternate methods for determining IRPI and Demand position indication. The use of these notes represent a generic deviation from NUREG-1431 format and content. These changes are not evaluated by the licensee and represent changes to the current TS. Provide plant specific analysis to show why the NUREG-1431 TS are unacceptable for adoption by the KNPP.

RAI #3

The proposed amendment also includes required actions and completion times for inoperable conditions of rod position indication systems specified in LCO 3.10.f which are not included in the current TS limits. These changes are not evaluated by the licensee. Provide plant specific analysis to show why the changes to current TS are acceptable TS limits for the KNPP.

RAI #4

The proposed amendment does not adopt NUREG Surveillance Requirements or the Bases Sections for Background, Applicable Safety Analyses, Applicability, LCO and Surveillance Requirements. These omissions represent a generic deviation from NUREG-1431 content. The change to NUREG-1431 is not evaluated by the licensee. Provide plant specific analysis to show why the Surveillance Requirements and Bases (as specified in NUREG-1431 TS) are unacceptable for adoption by the KNPP.