

NRC-03-073

10 CFR 50.90

June 30, 2003

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

**KEWAUNEE NUCLEAR POWER PLANT  
DOCKET 50-305  
LICENSE No. DPR-43  
RESOLUTION OF HOLD REQUEST FOR LICENSE AMENDMENT REQUEST 193,  
MEASUREMENT UNCERTAINTY RECAPTURE POWER UPRATE FOR KEWAUNEE  
NUCLEAR POWER PLANT (TAC NO. MB7225)**

**Reference** Letter NRC-03-004 from Thomas Coutu to Document Control Desk, "License Amendment Request 193, Measurement Uncertainty Recapture Power Uprate for Kewaunee Nuclear Power Plant," dated January 13, 2003 (TAC No. MB7225).

On January 13, 2003, the Nuclear Management Company, LLC, (NMC) transmitted "License Amendment Request 193, Measurement Uncertainty Recapture (MUR) Power Uprate for Kewaunee Nuclear Power Plant." This MUR power uprate would change the operating license and the associated plant Technical Specifications (TS) for the Kewaunee Nuclear Power Plant (KNPP) to reflect an increase in the rated power from 1650 MWt. to 1673 MWt.

During a planned review of the analysis performed to support the Safe Shutdown/Appendix R Cooldown section of the reference letter (attachment 2, page 28), a discrepancy was noted between the assumed analysis plant lineup and the procedurally directed plant lineup. Specifically, the analysis assumed a specific Component Cooling (CC) water configuration, which resulted in achieving the 72-hour cooldown requirement, but was not supported by plant procedures.

On Thursday, June 26, 2003, NMC requested the Nuclear Regulatory Commission (NRC) delay approval of the MUR uprate license amendment until resolution of these discrepancies was determined. NMC has reached resolution of these discrepancies and has determined to modify KNPP's plant procedures to incorporate steps in the plant procedures to account for the analysis lineup. Therefore, the no significant hazards conclusions and environmental impact statement, stated in the referenced letter, remains valid.

The apparent cause of this request for delay of issuance of the license amendment was the scheduling of the plant review of the Appendix R Safe Shutdown analysis. NMC plans to uprate the KNPP 7.4% above the current licensed power level. This uprate is in two phases, a 1.4% MUR uprate and a 6% stretch uprate for a total of 7.4%. To accomplish this MUR uprate project some of the supporting analysis was performed at the 7.4% uprate power level, while some used the current analysis performed at 102% of rated power. In the project schedule the review of the Appendix R safe shutdown calculation was based on the analysis supporting the stretch uprate only, although the analysis supports both. In the beginning of June 2003 NMC discovered that the analysis review was scheduled improperly and immediately started the review of the analysis. During this planned review the discrepancy was uncovered.

The reason for the request to delay issuance of this amendment was to allow for a determination of whether to modify the analysis, which would require modifying the MUR uprate LAR or to modify the plant procedures. As the analysis contained conservatism in the input assumptions, NMC needed time to determine whether to modify the input assumptions to allow the current procedure based plant lineup or configure the procedures to the analysis lineup. NMC has determined to modify the plant procedures, thereby making them consistent with the analysis used in the submittal. The action for the modification of plant procedures is included in the commitment the NMC made in the referenced letter. Revisions to the Appendix R Fire procedures are now included in this commitment. The commitment is to complete revisions to affected operations procedures and provide appropriate training to operations for the implementation of the new rated power (attachment 12, commitment 3).

Specifically, conditional local manual actions are being added to the Appendix R Fire cooldown procedures, which are not currently required. One action is to locally manually isolate the idle CC water HX, if necessary. The second local manual action is to throttle CC water loads to achieve the assumed flow to obtain the required cooldown. These additional local manual actions are analyzed for completion more than one day after the event occurs, when the fire has been extinguished and additional emergency response personnel are available.

As part of the review of the delay request, NMC performed an extent of condition (EOC) review to determine if any other analysis used in the MUR LAR submittal had not been reviewed. The NMC found no other analysis, used in the MUR uprate submittal that had not been reviewed.

Therefore, NMC requests the NRC continue with the review and approval of the MUR uprate license amendment for the KNPP.

This letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on June 30, 2003.



Thomas Coutu  
Site Vice-President, Kewaunee Plant

GOR

cc US NRC, Region III  
US NRC, Senior Resident Inspector  
Electric Division, PSCW  
Mohammed Shuaibi, US NRC, NRR