NMC
Committed to Nuclear Excellence

Kewaunee Nuclear Power Plant
Operated by Nuclear Management Company, LLC

May 18, 2004

NRC-04-061
10 CFR 50.90

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

Kewaunee Nuclear Power Plant
Docket 50-305
License No. DPR-43

Response To Request For Additional Information Related To License Amendment Request 197 To The Kewaunee Nuclear Power Plant Technical Specifications

References 1) Letter from Thomas Coutu (NMC) to Document Control Deck (NRC), "License Amendment Request 197 To The Kewaunee Nuclear Power Plant Technical Specifications, 3.3.e, Service Water System", dated July 7, 2003.

2) Letter from John G. Lamb, (NRC) to Thomas Coutu (NMC), "Kewaunee Nuclear Power Plant - Request For Additional Information For Proposed Amendment Request to Revise Technical Specification 3.3.E, "Service Water System" (TAC NO. MB9944)," dated January 21, 2004.

During a phone conference on April 5, 2004, the Nuclear Regulatory Commission (NRC) staff requested clarifying changes to the Technical Specifications (TS) submitted in Reference 1. This letter is NMC's response to the NRC's requested changes.

Enclosure 1 contains the agreed upon changes to Technical Specification pages: TS 3.3-7 and TS 3.3-8. Enclosure 2 contains the marked up Technical Specification pages as revised: TS 3.3-7 and TS 3.3-8. Enclosure 3 contains the affected Technical Specification pages as revised: TS 3.3-7 and TS 3.3-8.

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As the response does not alter the conclusions reached in NMC's reference 1 submittal, the safety analysis, significant hazards determination, and the environmental considerations statements contained in reference 1 are still applicable and support the changes contained herein. This submittal contains no new commitments.

NMC requests approval of this license amendment request in accordance with the date specified in reference 1. If you have any questions concerning this submittal please contact Mr. Ted Maloney at (920) 388-8863.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on May 18, 2004.

Thomas Coutu

Thomas Coutu
Site Vice-President, Kewaunee Nuclear Power Plant
Nuclear Management Company, LLC

Enclosures (3)

cc : Administrator, Region III, USNRC
Project Manager, Kewaunee Nuclear Power Plant, USNRC
Senior Resident Inspector, Kewaunee Nuclear Power Plant, USNRC
Electric Division, PSCW

ENCLOSURE 1

NUCLEAR MANAGEMENT COMPANY, LLC ,

LATEST REVISIONS TO TS FOR LICENSE AMENDMENT REQUEST 197 TO KEWAUNEE NUCLEAR POWER PLANT, OPERATING LICENSE NO. DPR-43, DOCKET NO. 50-305

Latest Revisions to Submitted TS Pages:

TS 3.3-7
TS 3.3-8

2 Pages to Follow

e. Service Water System

1. The reactor shall not be made critical unless the following conditions are satisfied, except for LOW POWER PHYSICS TESTS and except as provided by TS 3.3.e.2.

   A. TWO service water trains are OPERABLE with each train consisting of:

      1. TWO service water pumps

      2. An OPERABLE flow path consisting of all valves and piping associated with the above train of components and required to function during accident conditions. This flow path shall be capable of taking a suction from the forebay and supplying water to the redundant safeguards headers.

   B. The Forebay Water Level Trip System is OPERABLE.

2. During power operation or recovery from an inadvertent trip, ONE service water train may be inoperable for a period of 72 hours. If OPERABILITY is not restored within 72 hours, then within 1 hour action shall be initiated to:

   - Achieve HOT STANDBY within the next 6 hours.
   - Achieve HOT SHUTDOWN within the following 6 hours.
   - Achieve and maintain Reactor Coolant System T_{avg} less than 350°F by use of alternate heat removal methods within an additional 36 hours.

3. Turbine Building Service Water Header Isolation ~~Logic~~ is only required to function for the service water train aligned to the turbine building header during a design basis accident. Therefore, the operability of the service water train not aligned to the turbine building header is independent of the operability of the isolation logic.

   A. IF one train of Isolation Logic is inoperable and the affected train of service water is **NOT** aligned to the turbine building header, the following action shall be taken:

      1. Administratively control the alignment of the service water train to prevent its alignment to the turbine building header.

   B. IF one train of Isolation Logic is inoperable and the affected train of service water is aligned to the turbine building header, the following action shall be taken immediately:

   1. Declare that train of Service Water inoperable, and

      ~~The following actions shall be completed~~ within 72 hours:

      (i)~~1.~~ Align the opposite train of service water to the turbine building header, or

      (ii)~~2.~~ Restore the Isolation Logic train to OPERABLE status.

C. If two trains of Isolation Logic are declared inoperable, the following actions shall be taken immediately:

1. An otherwise OPERABLE train of service water shall be de-selected as the supply for the turbine building header, and

2. Declare the train of service water aligned to the turbine building header inoperable~~.~~ and

~~The following actions shall be completed~~ within 72 hours:

(i)~~1.~~ One train of Isolation Logic shall be restored to OPERABLE status, and

(ii)~~2.~~ An OPERABLE train of service water with an OPERABLE train of Isolation Logic shall be aligned to the turbine building header.

D. If Valve SW-4A or SW-4B is inoperable and open, declare the associated train of service water inoperable and ~~complete the following~~ restore the inoperable valve to OPERABLE status within 72 hours~~:~~.

~~1. Align the opposite train of service water to the turbine building header, or~~

~~2. Restore the inoperable valve to OPERABLE status.~~

E. If both SW-4A and SW-4B are inoperable, perform the following:

1. Declare the service water train with the open valve inoperable, and

2. Restore one valve to OPERABLE status and open it within 72 hours. Close the INOPERABLE valve.

F. If the conditions described in A, B, C, D, and E cannot be met, commence Plant Shutdown in accordance with TS 3.3.e.2.

ENCLOSURE 2

NUCLEAR MANAGEMENT COMPANY, LLC ,

MARKED UP TS PAGES FOR LICENSE AMENDMENT REQUEST 197 TO KEWAUNEE NUCLEAR POWER PLANT, OPERATING LICENSE NO. DPR-43, DOCKET NO. 50-305

Marked Up TS Pages:

TS 3.3-7
TS 3.3-8

2 Pages to Follow

e. Service Water System

1. The reactor shall not be made critical unless the following conditions are satisfied, except for LOW POWER PHYSICS TESTS and except as provided by TS 3.3.e.2.

   A. TWO service water trains are OPERABLE with each train consisting of:

      1. TWO service water pumps

      2. An OPERABLE flow path consisting of all valves and piping associated with the above train of components and required to function during accident conditions. This flow path shall be capable of taking a suction from the forebay and supplying water to the redundant safeguards headers.

   B. The Forebay Water Level Trip System is OPERABLE.

2. During power operation or recovery from an inadvertent trip, ONE service water train may be inoperable for a period of 72 hours. If OPERABILITY is not restored within 72 hours, then within 1 hour action shall be initiated to:

   - Achieve HOT STANDBY within the next 6 hours.
   - Achieve HOT SHUTDOWN within the following 6 hours.
   - Achieve and maintain Reactor Coolant System T_{avg} less than 350°F by use of alternate heat removal methods within an additional 36 hours.

3. Turbine Building Service Water Header Isolation is only required to function for the service water train aligned to the turbine building header during a design basis accident. Therefore, the operability of the service water train not aligned to the turbine building header is independent of the operability of the isolation logic.

   A. IF one train of Isolation Logic is inoperable and the affected train of service water is NOT aligned to the turbine building header, the following action shall be taken:

      1. Administratively control the alignment of the service water train to prevent its alignment to the turbine building header.

   B. IF one train of Isolation Logic is inoperable and the affected train of service water is aligned to the turbine building header, the following action shall be taken immediately:

      1. Declare that train of Service Water inoperable, and within 72 hours:

         (i) Align the opposite train of service water to the turbine building header, or

         (ii) Restore the Isolation Logic train to OPERABLE status.

C. If two trains of Isolation Logic are declared inoperable, the following actions shall be taken immediately:

1. An otherwise OPERABLE train of service water shall be de-selected as the supply for the turbine building header, and

2. Declare the train of service water aligned to the turbine building header inoperable and within 72 hours:

   (i) One train of Isolation Logic shall be restored to OPERABLE status, and

   (ii) An OPERABLE train of service water with an OPERABLE train of Isolation Logic shall be aligned to the turbine building header.

D. If Valve SW-4A or SW-4B is inoperable and open, declare the associated train of service water inoperable and restore the inoperable valve to OPERABLE status within 72 hours.

E. If both SW-4A and SW-4B are inoperable, perform the following:

1. Declare the service water train with the open valve inoperable, and

2. Restore one valve to OPERABLE status and open it within 72 hours. Close the INOPERABLE valve.

F. If the conditions described in A, B, C, D, and E cannot be met, commence Plant Shutdown in accordance with TS 3.3.e.2.

ENCLOSURE 3

NUCLEAR MANAGEMENT COMPANY, LLC ,

AFFECTED TS PAGES FOR LICENSE AMENDMENT REQUEST 197 TO KEWAUNEE NUCLEAR POWER PLANT, OPERATING LICENSE NO. DPR-43, DOCKET NO. 50-305

Affected TS Pages:

TS 3.3-7
TS 3.3-8

2 Pages to Follow

e. Service Water System

1. The reactor shall not be made critical unless the following conditions are satisfied, except for LOW POWER PHYSICS TESTS and except as provided by TS 3.3.e.2.

   A. TWO service water trains are OPERABLE with each train consisting of:

      1. TWO service water pumps

      2. An OPERABLE flow path consisting of all valves and piping associated with the above train of components and required to function during accident conditions. This flow path shall be capable of taking a suction from the forebay and supplying water to the redundant safeguards headers.

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   A. IF one train of Isolation Logic is inoperable and the affected train of service water is **NOT** aligned to the turbine building header, the following action shall be taken:

      1. Administratively control the alignment of the service water train to prevent its alignment to the turbine building header.

   B. IF one train of Isolation Logic is inoperable and the affected train of service water is aligned to the turbine building header, the following action shall be taken immediately:

      1. Declare that train of Service Water inoperable, and within 72 hours:

         (i) Align the opposite train of service water to the turbine building header, or

         (ii) Restore the Isolation Logic train to OPERABLE status.

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1. An otherwise OPERABLE train of service water shall be de-selected as the supply for the turbine building header, and

2. Declare the train of service water aligned to the turbine building header inoperable and within 72 hours:

   (i) One train of Isolation Logic shall be restored to OPERABLE status, and

   (ii) An OPERABLE train of service water with an OPERABLE train of Isolation Logic shall be aligned to the turbine building header.

D. If Valve SW-4A or SW-4B is inoperable and open, declare the associated train of service water inoperable and restore the inoperable valve to OPERABLE status within 72 hours.

E. If both SW-4A and SW-4B are inoperable, perform the following:

1. Declare the service water train with the open valve inoperable, and

2. Restore one valve to OPERABLE status and open it within 72 hours. Close the INOPERABLE valve.

F. If the conditions described in A, B, C, D, and E cannot be met, commence Plant Shutdown in accordance with TS 3.3.e.2.