



August 6, 2004

NRC-04-092
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 NRC Request for Additional information re: License Amendment Request 203 To The Kewaunee Nuclear Power Plant Technical Specifications, "Rod Position Indication."

Reference: 1) Letter from NMC to NRC, "License Amendment Request 203 To The Kewaunee Nuclear Power Plant Technical Specifications, "Rod Position Indication," dated May 25, 2004

The Nuclear Management Company, LLC, (NMC) submitted a license amendment request (LAR), number 203, to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS) to revise Section 3.10.f, "Inoperable Rod Position Indicator Channels," reference 1. This LAR requested changes to KNPP TS to add an allowed outage time (AOT) for the IRPI system of 24 hours with more than one IRPI per group inoperable. The current TS do not have an AOT for this condition. Reference 1 also requested additional changes to the KNPP TS. Those additional changes include adding the demand step counters, adding a note to allow for a soak time subsequent to substantial rod motion for the rods that exceed their position limits before invoking the TS requirements, and defining "immediately" in TS section 1.0.

Subsequently the NRC staff has requested additional information to clarify parts of the submittal. This letter is the NMC response to the NRC staff's request. Enclosure 1 to this letter contains the NRC staff's questions with NMC's response. The information contained in this response does not alter the conclusions reached in the no significant hazards determination and environmental considerations contained in reference 1.

A001

Docket 50-305
NRC-04-062
Page 2

A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

NMC requests approval as delimited in reference 1.

This letter makes the no new commitments or revisions to previous commitments.

If you have any questions or require additional information, please contact Mr. Gerald Riste at (920) 388-8424.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on August 6, 2004.

A handwritten signature in black ink, appearing to read "Thomas Coutu", with the word "for" written below it.

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

Enclosures (1)

cc: Administrator, Region III, USNRC
Senior Resident Inspector, Kewaunee, USNRC
Project Manager, Kewaunee, USNRC
Public Service Commission of Wisconsin

ENCLOSURE 1

NUCLEAR MANAGEMENT COMPANY, LLC

NMC RESPONSE TO NRC STAFFS' REQUEST FOR ADDITIONAL INFORMATION

RE: EVALUATION OF LICENSE AMENDMENT REQUEST 203 TO KEWAUNEE

NUCLEAR POWER PLANT, OPERATING LICENSE NO. DPR-43

DOCKET NO. 50-305

NRC Staff Question #1

The technical analysis section for the proposed change no. 6 states that the rod position will be verified every 12 hours as part of the new action statement. However, in the markup and revised pages (TS 3.10-6), it is stated that the rod position is verified by movable incore detectors every 8 hours. Please clarify which time duration is correct for performing this action.

NMC Response:

The rod position verification will be performed every 8 hours as stated in the technical specification. Originally, NMC thought the intent of the verification periodicity was to be performed on a operations shift basis. As the operations crew at KNPP is on a 12-hour shift rotation, once every 12 hours was thought to be the intent. On further review the decision to stay with the NUREG 1431 8-hour frequency was made without changing the time period in the technical analysis section.

NRC Staff Question #2

In the markup page (TS 3.10-6), it is stated for item D that either the inoperable IRPI be restored to OPERABLE status within 24 hours or the plant be placed in HOT SHUTDOWN (MODE 4) in 6 hours. The WOG STS requires the plant to be placed in HOT STANDBY (MODE 3) in 6 hours when any action items cannot be completed in the given time. Please justify this deviation from the STS and whether the plant can successfully be placed into MODE 4 within 6 hours if that option is chosen.

NMC Response:

This is not a deviation from STS just a difference in the mode description between STS and KNPP's custom technical specifications (CTS). NUREG 1431 Rev 3, states that Mode 3, "Hot Standby," is where the plant is in a condition where keff is < 0.99 (Reactor Shutdown) and the average reactor coolant temperature is $\geq 350^{\circ}\text{F}$. In KNPP Technical Specifications definitions, item 1.0.j, "Modes", Hot Shutdown is the KNPP similar to STS Mode 3, Hot Standby.

Table 1 STS to KNPP CTS Mode Comparison		
STS Mode #	STS Mode Title	KNPP CTS Mode Title
1	Power Operation	Operating
2	Startup	Hot Standby
3	Hot Standby	Hot Shutdown
4	Hot Shutdown	Intermediate Shutdown
5	Cold Shutdown	Cold Shutdown
6	Refueling	Refueling

The table below is from KNPP CTS that describes the Plant Modes.

Table 2 Kewaunee Nuclear Power Plant Technical Specification 1.0.j - Modes			
<u>MODE</u>	REACTIVITY $\Delta k/k$	COOLANT TEMP T_{avg} °F	FISSION POWER %
REFUELING	$\leq -5\%$	≤ 140	~ 0
COLD SHUTDOWN	$\leq -1\%$	≤ 200	~ 0
INTERMEDIATE SHUTDOWN	(1)	$> 200 < 540$	~ 0
HOT SHUTDOWN	(1)	≥ 540	~ 0
HOT STANDBY	$< 0.25\%$	$\sim T_{oper}$	< 2
OPERATING	$< 0.25\%$	$\sim T_{oper}$	≥ 2
LOW POWER PHYSICS TESTING	(To be specified by specific tests)		
(1) Refer to the required SHUTDOWN MARGIN as specified in the Core Operating Limits Report.			