

September 7, 2004

Mr. Thomas Coutu
Site Vice President
Kewaunee Nuclear Power Plant
Nuclear Management Company, LLC
N490 State Highway 42
Kewaunee, WI 54216

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL
INFORMATION REGARDING RESPONSE TO NUCLEAR REGULATORY
COMMISSION (NRC) BULLETIN 2003-01 (TAC NO. MB9584)

By letter dated August 7, 2003, Nuclear Management Company, LLC (NMC or the licensee) provided a 60-day response to NRC Bulletin 2003-01 for the Kewaunee Nuclear Power Plant (KNPP). On May 17, 2004, NMC submitted a supplement to its 60-day response which described the Westinghouse Owners Group (WOG) recommended candidate operator actions (COAs), which NMC planned to evaluate and implement at KNPP. On July 21, 2004, the NRC staff held a phone conversation with the NMC engineering staff, during which it was established that NMC believes that the technical feasibility of certain COAs is not yet assured, that the COA evaluation period may extend into early 2005, and that no containment entry is required to implement any of the five COAs selected by NMC for KNPP. During that call, the NRC staff was informed that NMC believes that the KNPP design departs significantly from the design of the WOG WCAP-16204 Bulletin 2003-01 reference plant. The NRC staff has completed its preliminary review of your response and has determined it needs additional information to complete its review as described in the enclosure.

The enclosed request was discussed with Mr. G. Riste of your staff on September 7, 2004. A mutually agreeable target date of November 5, 2004, for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-2296 at the earliest opportunity.

Sincerely,

Carl F. Lyon, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosure: Request for Additional Information

cc w/encl: See next page

September 7, 2004

Mr. Thomas Coutu
Site Vice President
Kewaunee Nuclear Power Plant
Nuclear Management Company, LLC
N490 State Highway 42
Kewaunee, WI 54216

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL INFORMATION REGARDING RESPONSE TO NUCLEAR REGULATORY COMMISSION (NRC) BULLETIN 2003-01 (TAC NO. MB9584)

By letter dated August 7, 2003, Nuclear Management Company, LLC (NMC or the licensee) provided a 60-day response to NRC Bulletin 2003-01 for the Kewaunee Nuclear Power Plant (KNPP). On May 17, 2004, NMC submitted a supplement to its 60-day response which described the Westinghouse Owners Group (WOG) recommended candidate operator actions (COAs), which NMC planned to evaluate and implement at KNPP. On July 21, 2004, the NRC staff held a phone conversation with the NMC engineering staff, during which it was established that NMC believes that the technical feasibility of certain COAs is not yet assured, that the COA evaluation period may extend into early 2005, and that no containment entry is required to implement any of the five COAs selected by NMC for KNPP. During that call, the NRC staff was informed that NMC believes that the KNPP design departs significantly from the design of the WOG WCAP-16204 Bulletin 2003-01 reference plant. The NRC staff has completed its preliminary review of your response and has determined it needs additional information to complete its review as described in the enclosure.

The enclosed request was discussed with Mr. G. Riste of your staff on September 7, 2004. A mutually agreeable target date of November 5, 2004, for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-2296 at the earliest opportunity.

Sincerely,

Carl F. Lyon, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-305
Enclosure: Request for Additional Information
cc w/encl: See next page

DISTRIBUTION:

PUBLIC	OGC	THarris	LWhitney	AWang
PD III-1 R/F	FLyon	ACRS	SReynolds, RIII	DLPMDPR

ACCESSION NO.: ML042450350

OFFICE	PDIII-1/PM	PDIII-1/LA	PDIII-1/SC
NAME	FLyon	THarris	LRaghavan
DATE	09/07/04	09/02/04	09/07/04

OFFICIAL RECORD COPY

REQUEST FOR ADDITIONAL INFORMATION

BULLETIN 2003-01, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON
EMERGENCY SUMP RECIRCULATION AT PRESSURIZED WATER REACTORS"

KEWAUNEE NUCLEAR POWER PLANT

NUCLEAR MANAGEMENT COMPANY, LLC

DOCKET NO. 50-305

By letter dated August 7, 2003, Nuclear Management Company, LLC (NMC or the licensee) provided a 60-day response to Nuclear Regulatory Commission (NRC) Bulletin 2003-01 for the Kewaunee Nuclear Power Plant (KNPP). The Bulletin requested NMC to either (1) state that the emergency core cooling system (ECCS) and the containment spray system (CSS) recirculation functions have been analyzed with respect to the potentially adverse post-accident debris blockage effects identified in the Bulletin and are in compliance with all existing applicable regulatory requirements, or (2) describe any interim compensatory measures that have been implemented or that will be implemented to reduce the interim risk associated with potentially degraded or nonconforming ECCS and CSS recirculation functions until an evaluation to determine compliance is complete. On May 17, 2004, NMC submitted a supplement to its 60-day response which described the Westinghouse Owners Group (WOG) recommended candidate operator actions (COAs), which NMC planned to evaluate and implement at KNPP. On July 21, 2004, the NRC staff held a phone conversation with the NMC engineering staff during which it was established that NMC believes that the technical feasibility of certain COAs is not yet assured, that the COA evaluation period may extend into early 2005, and that no containment entry is required to implement any of the five COAs selected by NMC for KNPP. During that call, the NRC staff was informed that NMC believes that the KNPP design departs significantly from the design of the WOG WCAP-16204 Bulletin 2003-01 reference plant. The NRC staff has completed its preliminary review of your response and has determined it needs the following additional information to complete its review:

1. Please provide a detailed discussion of the NMC plans and schedule for study, evaluation, development, validation, implementation and training for COAs #5, #6, #8, and #9, currently planned to be implemented at KNPP. Please provide such a discussion for each COA individually for the time period May 2004, to November 2005. Within these discussions, please discuss in detail how differences between KNPP design and the WOG WCAP-16204 Bulletin 2003-01 reference plant design may impact these schedules. Also, please discuss any unique circumstances relating to engineering resources available within NMC which may impact these schedules.
2. Please address any specific aspects of the KNPP design, relative to the issue of recirculation blockage, that would indicate that the schedule you plan for implementation of the COA's is commensurate with the reduction in risk which could be achieved with an earlier implementation.

3. On pages 1 and 2 of Attachment 1 of your Bulletin 2003-01 response, you listed a number of "Just-in-Time" training topics. However, your response does not completely discuss the operator training to be implemented. Please provide a detailed discussion of the operating procedures to be implemented, the indications of sump clogging that the operators are instructed to monitor, and the response actions the operators are instructed to take in the event of sump clogging and loss of ECCS recirculation capability.
4. NRC Bulletin 2003-01 provides possible interim compensatory measures licensees could consider to reduce risks associated with sump clogging. In addition to those compensatory measures listed in Bulletin 2003-01, licensees may also consider implementing unique or plant-specific compensatory measures, as applicable. Please discuss any possible unique or plant-specific compensatory measures you considered for implementation at your plant. Include a basis for rejecting any of these additional considered measures.

Kewaunee Nuclear Power Plant

cc:

John Paul Cowan
Executive Vice President &
Chief Nuclear Officer
Nuclear Management Company, LLC
700 First Street
Hudson, MI 54016

Plant Manager
Kewaunee Nuclear Power Plant
N490 Highway 42
Kewaunee, WI 54216-9511

Manager, Regulatory Affairs
Kewaunee Nuclear Power Plant
N490 Highway 42
Kewaunee, WI 54216-9511

David Molzahn
Nuclear Asset Manager
Wisconsin Public Service Corporation
600 N. Adams Street
Green Bay, WI 54307-9002

Resident Inspectors Office
U. S. Nuclear Regulatory Commission
N490 Hwy 42
Kewaunee, WI 54216-9511

Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Jonathan Rogoff
Vice President, Counsel & Secretary
Nuclear Management Company, LLC
700 First Street
Hudson, WI 54016

Larry L. Weyers
Chairman, President and CEO
Wisconsin Public Service Corporation
600 North Adams Street
Green Bay, WI 54307-9002

David Zellner
Chairman - Town of Carlton
N2164 County B
Kewaunee, WI 54216

Mr. Jeffery Kitsembel
Electric Division
Public Service Commission of Wisconsin
PO Box 7854
Madison, WI 53707-7854