

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

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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:

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