



Kewaunee Nuclear Power Plant  
Operated by Nuclear Management Company, LLC

September 30, 2004

NRC-04-109  
10CFR 50.71

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

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

Kewaunee Nuclear Power Plant Technical Requirements Manual Revision

Nuclear Management Company (NMC), licensee for the Kewaunee Nuclear Power Plant (KNPP), hereby submits a revision to the Technical Requirements Manual (TRM). The TRM is revised to incorporate the KNPP Technical Specification changes associated with Operating License Amendment 174. This amendment relocates the requirements for hydrogen monitors from the Technical Specifications to the TRM.

The 10 CFR 50.71(e)(4) states the requirements for submittal of the KNPP Updated Safety Analysis Report (USAR). As the KNPP TRM is considered a part of the USAR by reference, it is also required to be submitted to the NRC. Because decisions of plant operations are made based in part on information contained in the TRM, these changes are hereby submitted to meet the 10CFR 50.71 requirements and provide current information to the NRC.

Enclosed is a copy of the revised TRM.

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

Enclosure (2)

cc: Administrator, Region III, USNRC  
Project Manager, Kewaunee, USNRC  
Senior Resident Inspector, Kewaunee, USNRC  
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## ENCLOSURE 1

### KEWAUNEE NUCLEAR POWER PLANT TECHNICAL REQUIREMENTS MANUAL

#### Containment Hydrogen Monitoring System Requirements

The Technical Requirements Manual is revised to incorporate the Amendment changes associated with Amendment 174. Technical Specification 174 relocates the requirements for hydrogen monitors from the Technical Specifications to the Technical Requirements Manual.

Please follow instructions listed below. This copy is to serve as a record of a revision to your control copy.

<u>Remove Pages</u>	<u>Insert Pages</u>
Technical Requirements Manual, Table of Contents, Rev. 4, page i	Technical Requirements Manual, Table of Contents, Rev. 5, page i
Purpose & General Information, Rev. 1, page 1.0-1	General Information, Rev. 2, page 1.0-1
Purpose & General Information, Rev. 1, page 1.0-2	General Information, Rev. 2, page 1.0-2
	Containment Hydrogen Monitoring System, Rev. 0, page 3.5.1-1
	Containment Hydrogen Monitoring System, Rev. 0, page 3.5.1-2

**ENCLOSURE 2**

**KEWAUNEE NUCLEAR POWER PLANT  
TECHNICAL REQUIREMENTS  
MANUAL**

**PAGE INSERTS**

**5 pages follow**

KEWAUNEE NUCLEAR POWER PLANT  
TECHNICAL REQUIREMENTS MANUAL

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## **1.0 GENERAL INFORMATION**

### **1. PURPOSE:**

The Technical Requirements Manual (TRM) is a Kewaunee Nuclear Power Plant (KNPP) controlled document, which supplements the Kewaunee Technical Specifications. The TRM contains requirements similar to the Technical Specifications, which are not required to be located in the Technical Specifications, because they do not meet the requirements of 10 CFR 50.36. Although these requirements are excluded from Technical Specifications, they are still requirements placed upon plant operation due to regulatory issues. The TRM is considered a part of the Updated Safety Analysis Report (USAR).

### **2. ORGANIZATION:**

#### **Section 2.0 -- REPORTS**

This section currently contains the Core Operating Limits Report (COLR). This is a KNPP controlled document that provides cycle-specific parameter limits for the current reload cycle. These cycle-specific parameter limits shall be determined for each reload cycle in accordance with Technical Specification Section 6.9(a)(4), "Core Operating Limits Report (COLR)". Plant operation within these limits is addressed in the individual specifications.

Other reports may be added to this section, as they become available and as deemed appropriate.

#### **Section 3.0 -- ADMINISTRATIVE LIMITING CONDITIONS FOR OPERATION (ALCOs) AND ADMINISTRATIVE SURVEILLANCE REQUIREMENTS (ASRs)**

This section contains administrative (i.e., non-Technical Specification) Limiting Conditions for Operation and Surveillance Requirements (designated as ALCOs and ASRs, respectively), in order to distinguish them from Technical Specification requirements.

Specific ALCOs / ASRs will be grouped under the appropriate subsection and sequentially numbered within the subsections.

If an ALCO is not met, or if an ASR is missed, a Corrective Action Program (CAP) item is to be submitted to document the circumstances.

As ALCOs and ASRs become available, they will be inserted into this section.

#### **Section 4.0 -- PROGRAMS**

The Program Description includes a designation of organizational program ownership, a description of the methodology or basis for establishing acceptance criteria, any associated reporting requirements, content review frequency, and method for determining program effectiveness. Also included will be a description of Program implementation and change control. Where appropriate, applicable TS LCO and TRM ALCO required actions or other compensatory measures will be noted.

As Programs are developed, they will be inserted into this section. There are none at this time.

### **3. REVISIONS:**

Revisions to the TRM will be made in accordance with procedure GNP-03.25.01, "Technical Specification Bases and Technical Requirements Manual Control Procedure". As part of the USAR, the revisions must comply with the requirements of 10 CFR 50.59.

### **4. DEFINITIONS:**

The definitions given in the KNPP Technical Specifications Section 1.0, are to be applied to the appropriate ALCOs and ASRs specified in the TRM.

### **5. REFERENCES:**

- a. KNPP Technical Specifications
- b. GNP-03.25.01, "Technical Specification Bases and Technical Requirements Manual Control Procedure"
- c. NAD-03.25, "Technical Requirements Manual Control Directive"
- d. NAD-04.04, "Changes, Tests, and Experiments (10CFR50.59)"

### 3.5.1 CONTAINMENT HYDROGEN MONITORING SYSTEM

#### APPLICABILITY

During OPERATING or HOT STANDBY Modes.

#### OBJECTIVE

To monitor the beyond design-basis accident containment air and provide a continuous indication of hydrogen concentration.

#### TECHNICAL REQUIREMENTS

##### Administrative Limiting Conditions for Operation (ALCOs)

- a. Two trains of the Containment Hydrogen Monitoring System shall be OPERABLE except as allowed below:
  1. One train may be inoperable for 30 days.
  2. Two trains may be inoperable for 72 hours.
- b. If operability is not restored in the timeframes above, then immediately initiate a Corrective Action to assure prompt attention and adequate management oversight.
- c. A change in operational MODES or conditions is acceptable with one or both trains of the Containment Hydrogen Monitoring System inoperable.

##### Administrative Surveillance Requirement (ASRs)

CHANNEL DESCRIPTION	CHECK	CALIBRATE	TEST	REMARKS
Containment Hydrogen Monitors	Daily	Each refueling cycle	Monthly	

## BASES

The TS requirements for a Containment Hydrogen Monitoring System have been removed from TS as listed in the Federal Register on September 25, 2003. Guidance for the Consolidated Line Item Improvement Process (CLIIP) has been incorporated in the Technical Specification Task Force (TSTF) Change Traveler 447, Rev.1. Part of the requirements for removing Containment Hydrogen Monitoring System from TS was to place any remaining requirements in a Licensee controlled document (Technical Requirements Manual) with the requirements that a hydrogen monitoring system be available for beyond design-basis accident monitoring of containment hydrogen levels.

Even though the requirements for Hydrogen Monitors were taken out of TS, the system still needs to be available for beyond design-basis accident monitoring of containment hydrogen levels. In the event ALCO a.1 or a.2 are not met, an Action Request will be initiated immediately to address why the hydrogen monitors was not restored to OPERABLE status within the allotted time. Actions shall be implemented in a timely manner to place the unit in a safe condition as determined by plant management. The intent of this Action Request is to utilize the Corrective Action Program to assure prompt attention and adequate management oversight to minimize the additional time the hydrogen monitors are inoperable.