



Kewaunee Nuclear Power Plant  
Operated by Nuclear Management Company, LLC

January 27, 2005

NRC-05-011  
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

License Amendment Request 205a To The Kewaunee Nuclear Power Plant Technical Specifications, Change to Accumulator Completion Time and Deletions of Items from Table TS 4.1-1

- References:
- 1) Letter from T Coutu (NMC) to Document Control Desk (NRC), "LAR 205 to the Kewaunee Nuclear Power Plant Technical Specifications, Change to Accumulator Completion Time and Deletions of Items from Table TS 4.1-1," dated July 6, 2004.
  - 2) Letter from CF Lyon (NRC) to T Coutu (NMC), "Kewaunee Nuclear Power Plant – Issuance of Amendment Re: Accumulator Completion Time (TAC NO. MC3771)," dated October 5, 2004.

Pursuant to 10 CFR 50.90, the Nuclear Management Company, LLC, (NMC) is submitting this supplement to License Amendment Request (LAR) 205 to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS). The LAR 205 originally deleted Table TS 4.1-1, Item 22, "Accumulator Level and Pressure," in its entirety. However, the NMC wishes to retain the surveillance to perform a check each shift as listed in Table TS 4.1-1, Item 22. Therefore, this supplement will restore Table TS, Item 22, and relocate only its calibration requirements to plant procedures. This change does not affect the regulatory safety analysis or the environmental considerations evaluation submitted in reference 1.

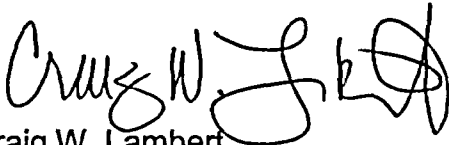
The original LAR also proposed to extend the completion time in the KNPP TS 3.3.a.2.B and to relocate Table TS 4.1-1, Item 25, "Portable Radiation Survey Instruments," to the Technical Requirements Manual. The NRC issued a safety evaluation (SE) on October 5, 2004 (reference 2), approving the change to TS 3.3.a.2.B for the accumulator completion time. This supplemental LAR does not change any information related to the accumulator completion time that has already been approved or to the proposed change to portable radiation survey instruments that is currently under review.

ADD 1

Enclosure 1 to this letter contains an evaluation of the proposed change to Table TS 4.1-1, Item 22. Enclosure 1 does not include a regulatory analysis nor an environmental considerations evaluation, as the original evaluations of LAR 205 remain unchanged. Enclosure 2 contains the marked up TS pages and Enclosure 3 contains the affected (revised) TS pages. Note that Table TS 4.1-1, page 4 of 7, is affected by LAR 204, which is currently on the docket.

No new commitments are made as a result of this supplemental LAR. Once approved, the amendment will be implemented within 60 days. If you have any questions or require additional information, please contact Mr. Gerald Riste at (920) 388-8424. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on January 27, 2005.

A handwritten signature in black ink, appearing to read 'Craig W. Lambert', with a stylized flourish at the end.

Craig W. Lambert  
Site Vice President, Kewaunee Nuclear Power Plant  
Nuclear Management Company, LLC

Enclosures (3)

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

**ENCLOSURE 1**  
**NUCLEAR MANAGEMENT COMPANY, LLC,**  
**EVALUATION OF LICENSE AMENDMENT REQUEST 205a TO KEWAUNEE**  
**NUCLEAR POWER PLANT, OPERATING LICENSE NO. DPR-43,**  
**DOCKET NO. 50-305**

## **1.0 DESCRIPTION**

The Nuclear Management Company (NMC), LLC, proposes to supplement a license amendment request (LAR) made to amend the Kewaunee Nuclear Power Plant (KNPP) operating license DPR-43, Appendix A, "Technical Specifications." The LAR 205 (reference 1) originally deleted Technical Specification (TS) Table TS 4.1-1, Item 22, "Accumulator Level and Pressure," in its entirety. However, the NMC wishes to retain the surveillance to perform a check each shift as listed in Table TS 4.1-1, Item 22. Therefore, this supplemental LAR (LAR 205a) will restore Item 22 and relocate only the 18 month calibration listed in Table TS 4.1-1, Item 22, "Accumulator Level and Pressure," from the TS to plant procedures. This change does not affect the outcome of the regulatory safety analysis or the environmental considerations submitted in reference 1.

The original LAR also proposed to extend the accumulator completion time in the KNPP TS 3.3.a.2.B and to relocate Table TS 4.1-1, Item 25, "Portable Radiation Survey Instruments." The NRC issued a safety evaluation (SE) on October 5, 2004 (reference 2), approving the change to TS 3.3.a.2.B for the accumulator completion time. This supplemental LAR does not change any information related to the approved accumulator completion time that has already been approved and also does not change any information related to the portable radiation survey instrument change that is currently under NRC review.

## **2.0 PROPOSED CHANGE**

The following change is proposed in this supplemental LAR. The marked up and the affected TS page showing the proposed change are located in Enclosures 2 and 3, respectively.

1. Restore Table TS 4.1-1, Item 22, "Accumulator Level and Pressure," in its entirety. Delete only the calibration requirement from Table TS 4.1-1, Item 22, "Accumulator Level and Pressure." The calibration requirement will be relocated to plant procedures.

## **3.0 BACKGROUND**

In December 1992, the NRC completed a comprehensive examination of surveillance requirements in TS that require testing during power operation. The effort was part of the NRC Technical Specification Improvement Program (TSIP). The results were reported in NUREG-1366, "Improvements to Technical Specification Surveillance Requirements," (reference 3). On September 27, 1993, the NRC issued Generic Letter (GL) 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation," (reference 4). This correspondence provided licensees with guidance for implementing the recommendations of NUREG-1366.

In the reference 1 submittal, the NMC removed the entire contents of Table TS 4.1-1, Item 22. However, after further review of the GL 93-05, the NMC recognized that the checks performed each shift as required by this TS line item should have been retained. The checks each shift are used to confirm accumulator operability. Generic Letter 93-05 specifically stated that the only surveillance that should be retained is that required to confirm that the parameters defining accumulator operability are within their specified limits. Additionally, the GL text describes removing the analog channel operational test and channel calibrations from TS to existing plant procedures. Therefore, the NMC proposes to restore Item 22 of Table TS 4.1-1 and relocate only the calibration requirements. There is no analog channel operational test specified in KNPP TS. The relocation of the calibration requirements of Table TS 4.1-1, Item 22, "Accumulator Level and Pressure," to plant procedures is consistent with and implements the recommendations of GL 93-05.

#### **4.0 TECHNICAL ANALYSIS**

This change relocates the accumulator water level and pressure calibrations from TSs to plant procedures. This change is consistent with industry recognition that accumulator instrumentation operability is not directly related to the capability of the accumulators to perform their safety function. This proposed change implements GL 93-05, Item 7.4, "Accumulator Water Level and Pressure Channel Surveillance Requirements (PWR)."

#### **5.0 REGULATORY SAFETY ANALYSIS**

This proposed change does not affect the original regulatory safety analysis submitted in reference 1. Please refer to the original regulatory safety analysis in reference 1.

#### **6.0 ENVIRONMENTAL CONSIDERATIONS**

This proposed change does not affect the original environmental considerations review submitted in reference 1. Please refer to the original environmental considerations review in reference 1.

#### **7.0 REFERENCES**

1. Letter to Document Control Desk (NRC) from T Coutu (NMC), "LAR 205 to the Kewaunee Nuclear Power Plant Technical Specifications, Change to Accumulator Completion Time and Deletions of Items from Table TS 4.1-1," dated July 6, 2004.
2. Letter from CF Lyon (NRC) to T Coutu (NMC), "Kewaunee Nuclear Power Plant-Issuance of Amendment Re: Accumulator Completion Time (TAC NO. MC3771)," dated October 5, 2004.
3. NUREG-1366, "Improvements to Technical specification Surveillance Requirements," dated December 1992.

4. Generic Letter (GL) 93-05, "Line-item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation," dated September 27, 1993.

**ENCLOSURE 2**

**NUCLEAR MANAGEMENT COMPANY, LLC,  
MARKED UP TS PAGES FOR LICENSE AMENDMENT REQUEST 205a TO  
KEWAUNEE NUCLEAR POWER PLANT, OPERATING LICENSE NO. DPR-43,  
DOCKET NO. 50-305**

Marked Up TS Pages:  
Table TS 4.1-1, Page 4 of 7

**1 page follows**

TABLE TS 4.1-1

## MINIMUM FREQUENCIES FOR CHECKS, CALIBRATIONS AND TEST OF INSTRUMENT CHANNELS

CHANNEL DESCRIPTION	CHECK	CALIBRATE	TEST	REMARKS
18. a. Containment Pressure (SIS signal)	Each shift	Each refueling cycle	Monthly(a)	(a) Isolation Valve Signal
b. Containment Pressure (Steamline Isolation)	Each shift(a)	Each refueling cycle(a)	Monthly(a)	(a) Narrow range containment pressure (-3.0, +3.0 psig excluded)
c. Containment Pressure (Containment Spray Act)	Each shift	Each refueling cycle	Monthly	
d. Annulus Pressure (Vacuum Breaker)	Not applicable	Each refueling cycle	Each refueling cycle	
19. Radiation Monitoring System	Daily (a,b)	Each refueling cycle (a)	Quarterly (a)	(a) Includes only channels R11 thru R15, R19, R21, and R23 (b) Channel check required in all plant modes
20. Deleted				
21. Containment Sump Level	Not applicable	Not applicable	Each refueling cycle	
22. Accumulator Level and Pressure	Each shift	<del>Each refueling cycle</del> <u>Deleted</u>	Not applicable	
23. Steam Generator Pressure	Each shift	Each refueling cycle	Monthly	

**ENCLOSURE 3**

**NUCLEAR MANAGEMENT COMPANY, LLC,  
AFFECTED TS PAGES FOR LICENSE AMENDMENT REQUEST 205a TO  
KEWAUNEE NUCLEAR POWER PLANT, OPERATING LICENSE NO. DPR-43,  
DOCKET NO. 50-305**

Affected TS Pages:  
Table TS 4.1-1, Page 4 of 7

**1 page follows**

TABLE TS 4.1-1

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b. Containment Pressure (Steamline Isolation)	Each shift(a)	Each refueling cycle(a)	Monthly(a)	(a) Narrow range containment pressure (-3.0, +3.0 psig excluded)
c. Containment Pressure (Containment Spray Act)	Each shift	Each refueling cycle	Monthly	
d. Annulus Pressure (Vacuum Breaker)	Not applicable	Each refueling cycle	Each refueling cycle	
19. Radiation Monitoring System	Daily (a,b)	Each refueling cycle (a)	Quarterly (a)	(a) Includes only channels R11 thru R15, R19, R21, and R23 (b) Channel check required in all plant modes
20. Deleted				
21. Containment Sump Level	Not applicable	Not applicable	Each refueling cycle	
22. Accumulator Level and Pressure	Each shift	Deleted	Not applicable	
23. Steam Generator Pressure	Each shift	Each refueling cycle	Monthly	