

May 26, 2005

Mr. Michael G. Gaffney
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 AMENDMENT REQUEST (TAC NO. MC3337)

Dear Mr. Gaffney:

By letter dated June 1, 2004, Nuclear Management Company, LLC (NMC or the licensee) proposed a license amendment that revises Technical Specification (TS) 1.0, "Definitions," Table TS 3.5-2, "Instrument Operation Conditions for Reactor Trip," and Table TS 4.1-1, "Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels." The TS revisions will add a definition for "staggered test basis," increase surveillance test intervals for reactor protection system and engineered safety features actuation system analog channels and logic cabinets, and add a completion time for the reactor trip breakers. The U.S. Nuclear Regulatory Commission 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 May 12, 2005. A target date of July 1, 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,

/RA/

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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*previously concurred

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DATE	05/26/05	5/25/05	05/26/05

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Kewaunee Nuclear Power Plant

cc:

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REQUEST FOR ADDITIONAL INFORMATION

AMENDMENT REQUEST DATED JUNE 1, 2004, RE: REACTOR TRIP SYSTEM
AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEM SURVEILLANCE TEST
INTERVALS KEWAUNEE NUCLEAR POWER PLANT

NUCLEAR MANAGEMENT COMPANY, LLC

DOCKET NO. 50-305

1. Page 15 of 23 of the submittal states that the conditions/limitations of WCAP-15376 will be implemented through administrative controls. However, the licensee states that the referenced conditions/limitations are applicable or the diverse scram system is operable. This is inconsistent with the conditions/limitation presented by the WCAP and staff safety evaluation report (SER). Clarify that the conditions/limitations will be implemented per the WCAP and staff SER or justify any deviation or alternate approach.
2. Confirm through plant-specific Tier 1 probabilistic risk assessment (PRA) analysis that the Tier 2 restrictions identified by WCAP-15376 are bounding for the Kewaunee plant-specific case.
3. Page 15 of 23 of the submittal states that the Kewaunee configuration risk management is provided by the maintenance rule Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.65(a)(4). Provide a discussion on the applicability of the Kewaunee 10 CFR 50.65(a)(4) CRMP-based program meeting the additions and clarifications provided in Regulatory Guide (RG) 1.177, Section 2.3.7.2, Key Components 1 through 4.
4. Provide a discussion on the following aspects of PRA quality as applicable to the Kewaunee PRA.
 1. The plant-specific PRA reflects the as-built, as-operated plant.
 2. Applicable PRA updates including individual plant examination/individual plant examination of external events findings.
 3. Conclusions of the peer review including any facts and observations (A and B) applicable to the proposed extended surveillance test interval (STI) and completion times (CTs) and their resolution. If not resolved, justification for acceptability (e.g., sensitivity studies showing negligible impact). Indicate the PRA revision that underwent peer review and the PRA revision used in this application.
 4. Reference PRA quality assurance programs/procedures, including expected PRA revision schedules.

5. PRA adequacy and completeness with respect to evaluating the proposed STI and CT extensions.
6. Plant design or operational modifications not reflected in the PRA revision used in this application that are related to or could impact this application. Justify the acceptability of not including these modifications in the PRA as part of this application.
5. Page 4 of 12 of Enclosure 4, a definition of “staggered test basis” is added to the technical specification (TS) definitions and Table TS 4.1-1, Item 26, Protective System Logic Channel Testing. Based on the proposed “staggered test basis” identify the applicable TS test intervals and functional units.
6. The values given in the licensee submittal for the change in core damage frequency, change in large early release frequency, incremental conditional core damage probability, and incremental conditional large early release probability appear to be generic values based on WCAP-15376 results. Confirm that a Kewaunee plant-specific analysis meets the acceptance guidance of RG 1.174 and 1.177 and provide these plant specific-results. See also question 7 below.
7. Provide a plant-specific risk analysis of the performance of concurrent testing of one logic cabinet and associated reactor trip breaker to ensure conformance with the WCAP-15376 evaluation and RG 1.174 and 1.177 acceptance guidance. See WCAP-15376 staff SER page 11 and page 12. Because the WCAP evaluation results are sufficiently close to the RG acceptance guidance, confirm the plant-specific applicability for this configuration.
8. Provide an evaluation of external events risk impact including, seismic, fire, and external floods/high wind risk with respect to the proposed CT and STI extensions.
9. Provide an evaluation of cumulative risk impact including previous TS changes per RG 1.174, Section 3.3.2 guidance.