

From: Tam, Peter
Sent: Wednesday, January 13, 2010 1:49 PM
To: Jerry Riste (gerald.o.riste@dom.com); 'Jack Gadzala'; Craig D Sly; Thomas L Breene
Cc: Cusumano, Victor; Waig, Gerald; Sheng, Simon
Subject: Kewaunee - Draft RAI on the 8/24/09 application for ITS conversion (TAC ME2139)

Jerry:

This is regarding Kewaunee's 8/24/09 application (Accession No. ML092440398) for amendment to convert the TS from custom to standard (ITS) format.

Page 49 of Attachment 1, Volume 9, specified actions to be taken when Limiting Condition for Operation (LCO) 3.4.3 regarding pressure-temperature (P-T) limits is not met. These actions are identified as "M02," which stands for more restrictive changes. The current Technical Specifications (CTS) 3.0.c, "Limit Conditions for Operation," requires action to be initiated within 1 hour and to be in hot standby (equivalent to Mode 3) within the next 6 hours, hot shutdown (equivalent to Mode 4) within the following 6 hours, and cold shutdown (equivalent to Mode 5) within the subsequent 36 hours. These CTS 3.0.c actions will result in cold shutdown whenever the P-T limits are exceeded. However, the improved TS (ITS) version on Page 49 provides a path to continue the heatup or stay at power operation if the parameters are restored to within limits in 30 minutes and the reactor coolant system is determined to be acceptable for continued operation (in 72 hours). Comparing the CTS and ITS actions, the NRC staff concludes that the ITS actions are less restrictive than the CTS actions, not more restrictive as claimed by the submittal. Please clarify. If the LCO was severely violated but was restored in 30 minutes, please (1) discuss the steps to be taken to ensure that acceptability of continued operation will be determined within 72 hours (the CTS would have completed the shut down within 48 hours of the violation), and (2) discuss any plant procedure to identify the severity of the short excursion promptly before a formal evaluation is completed.

Please set up a conference call with me to discuss the above with our reviewers. **At this time this e-mail does not formally convey an NRC staff position, and does not formally request for additional information. The above question will be dispositioned in the proposed conference call.**

Peter S. Tam

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