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 AUTH. NAME AUTHOR AFFILIATION
 STEINHART, C.R. Wisconsin Public Service Corp.
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SUBJECT: Application for Proposed Amend 87a to License DPR-43, reflecting organizational changes.

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WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

August 15, 1989

10 CFR 50.90

U. S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 87a to the Kewaunee Nuclear Power Plant
Technical Specifications, Organizational Revision

Reference: 1) Letter from D. C. Hintz (WPSC) to Document Control Desk (NRC)
dated April 28, 1989

This Technical Specification (TS) amendment is being submitted to reflect recent organizational changes at Wisconsin Public Service Corporation (WPSC). The three TS pages contained in this TS amendment supersede three of the TS pages submitted by TS Amendment 87 (Reference 1).

Attachment 1 to this letter contains a description, a safety evaluation, and a significant hazards determination for the proposed changes. Attachment 2 contains the following affected TS pages: TS 6-8, TS 6-11 and TS 6-11a.

In accordance with the requirements of 10 CFR 50.30(b), this submittal has been signed and notarized. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

Sincerely,

C. R. Steinhardt

C. R. Steinhardt
Assistant Vice President-Nuclear Power

LAS/jms
Attach.

cc - Mr. Robert Nelson, US NRC
US NRC, Region III
Mr. R. S. Cullen, PSCW

Subscribed and Sworn to
Before Me This 15th Day
of August 1989

Deanne M. Stein
Notary Public, State of Wisconsin

My Commission Expires:
June 23, 1991

Appl
/

Attachment 1

Proposed TS Amendment No. 87a

August 15, 1989

Description of Changes, Safety Evaluation,
and Significant Hazards Determination

Description of Proposed Changes: Pages TS 6-8, 6-11, 6-11a

Paragraphs TS 6.5.3.2, 6.5.3.8, 6.5.3.9, and 6.5.3.10 have been revised to require the Nuclear Safety Review and Audit Committee (NSRAC) to report to a Senior Officer of the Company versus the Executive Vice President-Power. In addition, the phrase "or such person as he shall designate" has been removed from paragraph 6.5.3.2.

Paragraphs 6.5.3.3 and 6.6.1 have been revised to change the personnel title "Executive Vice President-Power" to "Assistant Vice President-Nuclear Power."

These changes are necessary due to recent changes in the WPSC nuclear organization as described in the Safety Evaluation below.

Safety Evaluation for Proposed Changes on Pages TS 6-8, 6-11, 6-11a

The proposed organizational changes in Specifications 6.5 and 6.6 are necessary due to the following WPSC nuclear organization changes.

On February 28, 1989, the Executive Vice President-Power retired from the WPSC organization. In anticipation of the Executive Vice President-Power's retirement, his departmental responsibilities were divided as indicated in our letter from Mr. C. R. Steinhardt (WPSC) to Mr. J. G. Gitter (NRC) dated November 2, 1988 (Attachment 3). Attachments 3, 4 and 5 to this letter describe the chronology of organizational changes that occurred during the past several months. One correction should be made to our letter dated July 10, 1989 (Attachment 5); the Manager-Nuclear Power is responsible for the Kewaunee Plant operations and

all corporate nuclear operations except the Corporate Administration, Nuclear Services, and Safety System Engineering departments which report directly to the Assistant Vice President-Nuclear Power. The Assistant Vice President-Nuclear Power is now responsible for the Kewaunee Plant, Corporate Nuclear, and Quality Assurance operations. The Assistant Vice President-Nuclear Power is exceedingly qualified to assume responsibility for the WPSC nuclear and quality assurance activities. He is a former WPSC Manager-Nuclear Power, Kewaunee Plant Manager, and Operations Superintendent. He also was licensed as a Senior Reactor Operator (SRO) on the Kewaunee Plant for eleven years. The Assistant Vice President-Nuclear Power reports directly to WPSC's Chief Executive Officer.

The WPSC Nuclear Safety Review and Audit Committee (NSRAC) will continue to report to a Senior Company Officer; however, this generic term will be used in place of a personnel title. The NSRAC Charter will document the personnel title of the Senior Officer. A Senior Company Officer is generally considered to be the WPSC Chief Executive Officer, President, or Executive or Senior Vice President. Removing a specific personnel title from the TS for this change will reduce the frequency of revisions to the TS. In addition, requiring the NSRAC to report to a Senior Company Officer is comparable or more conservative than the current requirement, given the definition of a Senior Company Officer above. The appointment of NSRAC members, the Chairman, and Vice Chairman shall continue to be the responsibility of the Senior Company Officer to whom the NSRAC reports; however, it is no longer requested that the responsibility may be delegated. The Assistant Vice President-Nuclear Power will approve the appointment of alternate NSRAC members since this is a routine administrative task. There

is no safety significance for the proposed change to paragraph 6.5.3.3 since the TS allows only two alternate members to participate in NSRAC activities at any one time.

Due to the extensive qualifications of the Assistant Vice President-Nuclear Power and his history of experience with WPSC's nuclear organization, this organizational change will not decrease the effectiveness of the WPSC nuclear organization. The reporting of the NSRAC to a Senior Company Officer will assure continued senior management support and involvement in the Kewaunee Plant activities.

Significant Hazards Determination for Proposed Changes to Pages TS 6-8, 6-11, 6-11a

The proposed changes reflect recent organizational changes within the WPSC nuclear organization. WPSC has determined that the recent organizational changes will not decrease the effectiveness of the WPSC nuclear organization. The proposed changes do not change the intent of the existing specifications. The proposed change to paragraph 6.5.3.9 is potentially more conservative than the existing requirement and is not any less conservative. Therefore, there are no significant hazards associated with these changes. These changes will not: 1) result in a significant decrease in the probability of occurrence or consequences of an accident, 2) create the possibility of a new or different kind of accident from any previously analyzed, or 3) involve a significant decrease in the margin of safety.