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SUBJECT: Application for Proposed Amend 87c to License DPR-43, reflecting exception to ANSI N18.7-1976,Section 5.2.15.

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December 20, 1989 10 CFR 50.90

U. S. Nuclear Regulatory Commission
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Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 87c to the Kewaunee Nuclear
Power Plant Technical Specifications

References:
1) Letter from D. C. Hintz (WPSC) to Document Control Desk (NRC) dated April 28, 1989
2) Letter form C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated August 15, 1989
3) Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated November 10, 1989
4) Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated June 9, 1989
5) Letter from G. C. Wright (NRC-Region III) to K. H. Evers (WPSC) dated November 11, 1989

Reference 1 submitted Technical Specification (TS) amendment 87 which covered organizational changes and miscellaneous revisions to the Kewaunee Nuclear Power Plant (KNPP) TS. Reference 2 submitted TS amendment 87a to reflect organizational changes which had occurred since amendment 87 was submitted. Reference 3 submitted TS amendment 87b that revised one of the changes made by amendment 87. The change made by amendment 87b addressed Nuclear Regulatory Commission (NRC) concerns on the review and approval process for temporary changes made to safety related procedures at the KNPP.

This letter submits TS amendment 87c. This proposed change is being submitted to reflect an exception to ANSI N18.7-1976 section 5.2.15 on the frequency of review for safety related procedures which have a performance interval of greater than every two years. This exception was submitted to the staff by Reference 4, Wisconsin Public Service Corporations's (WPSC) Operational Quality Assurance Program (OQAP), revision 8. The exception to section 5.2.15 of ANSI N18.7-1976 was reviewed and approved by the NRC as documented in Reference 5.

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In accordance with discussions with our project manager, Mr. A. Gody, Jr., amendment 87c supersedes amendment 87b in its entirety. This is to eliminate any possible confusion since both proposed changes affect the same page of the KNPP TS.

Attachment 1 to this letter contains a description, a safety evaluation and a significant hazards determination for the proposed change. Attachment 2 contains the affected TS page, TS 6-12.

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
Assistant Vice President-Nuclear Power

SLB/jms

Enc.

cc - US NRC, Region III
Mr. Patrick Castleman, US NRC
Mr. R. S. Cullen, PSCW

Subscribed and Sworn to
Before Me This 20th Day
of December 1989

Jeanne M. Stein
Notary Public, State of Wisconsin

My Commission Expires:
June 23, 1991

Attachment 1

Proposed TS Amendment No. 87c

Description of Changes, Safety Evaluation,
and Significant Hazards Determination

Description of Proposed Change to TS 6.8.2: Page TS 6-12

Specification 6.8.2 is revised as follows:

a) the word temporary has been added such that the phrase reads "except temporary changes," and

b) the phrase "a valid SRO license" has been replaced with the phrase "an active SRO license."

Safety Evaluation for Proposed Change to TS 6.8.2

The proposed changes are intended to clarify and add a level of control which is not in the existing specification 6.8.2. The concomitance of "temporary" will clarify which type of procedure changes are covered by specification 6.8.2 and match the wording of ANSI N18.7-1976, Section 5.2.2. The change "a valid SRO license" to "an active SRO license" is necessary in order to specify the level of personnel qualification required for an SRO license holder to approve temporary changes to procedures that affect nuclear safety. Holding "an active SRO license at Kewaunee" implies that the license holder is actively performing the functions of a senior operator as described in 10 CFR 55.4 and 10 CFR 55.53(e). The phrase "a valid SRO license at Kewaunee" implies an individual who may, or may not fit the description of "actively performing the functions of an operator or senior operator."

Therefore, specifying "an active SRO license" in place of "a valid SRO license" will further ensure that the person approving the temporary procedure change is cognizant of current plant status as warranted by the scope of the temporary

procedure change. This proposed change constitutes an additional restriction which is not presently in the existing specification; therefore, there is no safety significance.

Specification 6.8.2 is only applicable for temporary changes which clearly do not alter the intent of the procedure. Plant Administrative Control Directives (ACDs) state that temporary changes to safety related procedures which alter the intent of the procedure shall receive Plant Operation Review Committee (PORC) review and Plant Manager approval prior to implementation. Changes which alter the intent are further clarified in the ACDs to include: modifications to the procedure scope (i.e., the addition or deletion of tasks or components), a change in the methodology used to accomplish the task, or a change in the procedure's acceptance criteria.

Temporary changes which do not alter the intent of the procedure are: alterations which are necessary to accommodate a change in plant, system or component initial conditions, or to correct a typographical error. These types of changes are approved by two individuals knowledgeable in the area affected, one of which holds an active SRO license at Kewaunee.

In lieu of unnecessarily burdening PORC with an additional review and Plant Manager approval, KNPP relies upon existing checks and balances to ensure temporary changes to safety related procedures approved under the provisions of specification 6.8.2 are indeed minor in nature and do not alter the intent of the procedure. For the purposes of this discussion, there are three broad categories in which to classify temporary changes. These are: 1) changes made to

repetitive procedures which will become permanent changes, 2) changes made to repetitive procedures which will not become permanent, and 3) changes made to nonrepetitive procedures. Repetitive procedures are those that are performed on a regular basis. Nonrepetitive procedures are typically procedures that are performed only once.

The temporary changes to procedures which fit into the first category and affect nuclear safety are reviewed by PORC and approved by the Plant Manager when the temporary changes are incorporated as permanent changes. The second category of procedures, while not receiving a subsequent review of the temporary changes by PORC are reviewed by the cognizant individual and the active SRO to ensure they do not change the intent of the procedure. In addition, repetitive maintenance procedures, test procedures and operational checklists which affect nuclear safety are reviewed following completion by the applicable group supervisor. This review is to ensure that the objectives of the procedure were satisfied. Surveillance procedures, which are used to implement technical specification required activities, receive a department head review in addition to the group supervisor review. By its nature, a review to ensure that the procedure objectives are satisfied would detect any changes made that altered the intent of the procedure. If such cases are detected, the responsible supervisor would provide additional guidance to prevent a recurrence.

The last category of procedures are the one-time only procedures that are written and approved to perform design change modifications, special maintenance activities, operational evolutions not covered by existing procedures and special tests which affect nuclear safety. Each procedure is reviewed by two

individuals knowledgeable in the area affected, one of which holds an active SRO, in order to make the temporary changes. By the unique nature of these procedures, this review will prevent making changes which may alter the intent of the procedure without receiving prior PORC review and plant manager approval. Additionally, design change procedures, which comprise the majority of the procedures in this category, and maintenance procedures, receive a technical review after they are completed. One of the purposes of the technical review is to ensure that the modification or maintenance objectives were satisfied. By its nature, this review would detect any procedure changes made that altered the intent of the procedure. Again, if such cases are detected, the responsible supervisor would provide additional guidance to prevent a recurrance.

In addition to these existing checks and balances, the Quality Assurance (QA) Group regularly audits performance of activities which affect nuclear safety. Part of the QA audit normally includes reviewing the adequacy of the procedures used to perform the associated task and the level of compliance with the procedure. The QA group will, as a part of its normally planned audits, include a random review of completed procedures to ensure that temporary changes which altered the intent of the procedure received prior PORC review and Plant Manager approval, that changes which were appropriate to become permanent were so incorporated, and that temporary changes made in accordance with specification 6.8.2 were documented properly and did not change the intent of the procedure.

In summary, temporary changes which alter the intent of a procedure are presented to PORC for review and Plant Manager approval prior to implementation. Temporary changes which do not alter the intent are approved by two individuals

knowledgeable in the area affected, one of which holds an active SRO license at Kewaunee. Temporary changes which do not alter intent are minor in nature and as such there would be no increase in safety by requiring PORC review and Plant Manager approval. In lieu of PORC review and Plant Manager approval, there are sufficient checks and balances at KNPP to ensure that temporary changes to procedures are approved under the provisions of specification 6.8.2 and do not change the intent of the procedure. Additionally, the QA auditing function should provide continued oversight to assure adherence to specification 6.8.2.

Significant Hazards Determination for Proposed Change to TS 6.8.2

The proposed changes reflect a clarification and an additional restriction not presently included in technical specifications; therefore, there is no significant hazard associated with these changes. These changes will not: 1) result in a significant increase 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.

The proposed change is similar to example C.2.e(ii) in 51 FR 7751. Example C.2.e(ii) states that changes which constitute an additional limitation, restriction, or control not presently included in the technical specifications are not likely to involve a significant hazard.

Description of Proposed Change to TS 6.8.3: Page TS 6-12

Specification 6.8.3 has been created to describe an exception to section 5.2.15 of ANSI N18.7-1976 on the frequency of review for safety related procedures which have a performance interval of greater than every two years.

Safety Evaluation for Proposed Change to TS 6.8.3

ANSI N18.7-1976 section 5.2.15 requires that safety related plant procedures be reviewed no less frequently than every two years. However, in cases where procedures are performed at intervals greater than two years (e.g., once every 5 years), this requirement imposes an unnecessary burden which does not increase plant safety.

The proposed change will ensure that safety related procedures performed at a frequency interval greater than every two years are reviewed within the last two years prior to performance of the procedure. This results in the review of these procedures in a manner similar to more frequently performed procedures which are reviewed every two years. Therefore, this change is consistent with the intent of ANSI N18.7-1976 section 5.2.15 and does not involve a safety concern.

The exception to the two-year review interval for safety related procedures that are performed at a frequency interval of greater than two years was submitted to the staff as a part of the WPSC Operational Quality Assurance Program (OQAP) Description, revision 8, in a letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated June 9, 1989. The exception to section

5.2.15 of ANSI N18.7-1976 was reviewed and approved by the staff in a letter from G. C. Wright (NRC-Region III) to K. Evers (WPSC), dated November 11, 1989.

Significant Hazards Determination for Proposed Change to TS 6.8.3

The proposed change is an exception to section 5.2.15 of ANSI N18.7-1976. However, since safety related procedures will still require review within two years prior to performance, the intent of ANSI N18.7-1976 is satisfied and the margin of safety is not reduced. The proposed TS change does not present a significant hazard because the change will not: 1) result in a significant increase in the probability of occurrence or consequences of an accident, 2) increase 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.