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SUBJECT: Application for Proposed Amend 96 to License DPR-43, removing
 fire protection requirements from Tech Spec.

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WISCONSIN PUBLIC SERVICE CORPORATION

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September 17, 1990

10 CFR 50.90

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43 ...
Kewaunee Nuclear Power Plant
Proposed Amendment No. 96 to the Kewaunee Nuclear
Power Plant Technical Specifications, Fire Protection

- Reference:
- 1) Updated Safety Analysis Report from K. H. Evers (WPSC) to Document Control Desk dated July 20, 1990
 - 2) Generic Letter 86-10, Implementation of Fire Protection Requirements, dated April 24, 1986
 - 3) Generic Letter 88-12, Removal of Fire Protection Requirements from Technical Specifications, dated August 2, 1988

This proposed amendment request is being submitted for NRC approval to remove the fire protection requirements from the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications. This proposed amendment is in accordance with guidelines stated in Generic Letters 86-10 and 88-12 (References 2 and 3). The prerequisites for removing the fire protection requirements have been completed. These prerequisites include incorporating all fire protection requirements into the KNPP Fire Plan and incorporating the KNPP Fire Plan into the KNPP Updated Safety Analysis Report (Reference 1). This proposed amendment includes the required updating of the operating license with the standard fire protection license condition as stated in Generic Letter 86-10, Section F. Since the KNPP Technical Specifications differ from standardized technical specifications this proposed amendment includes the required updating of the administrative controls so that the KNPP Fire Protection Program is consistent with the administrative controls for the KNPP Emergency and Security Plans.

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Attachment 1 to this letter contains the Description of Change, Safety Evaluation, and Significant Hazards Determination for the proposed changes. Attachment 2 contains the affected Technical Specification pages. Page TS 6-2a is also affected by our proposed amendment 94, which was submitted to the NRC on June 29, 1990.

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
Vice President-Nuclear Power

DLR/jac

Attach.

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

Subscribed and Sworn to
Before Me This 17th Day
of September 1990


Notary Public, State of Wisconsin

My Commission Expires:
June 23, 1991

Attachment 1

To

Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC)

Dated

September 17, 1990

Proposed TS Amendment No. 96

Description of Change, Safety Evaluation,
Significant Hazards Determination

Description of the Proposed Change: Operating License Page 4

Section 2.C.(3) has been deleted and replaced with the standard license condition statement as shown in Generic Letter 86-10, Section F and as recommended by Generic Letter 88-12.

Safety Evaluation

The previous Section 2.C.(3) license condition required implementation of modifications to the plant which were committed to as a result of Branch Technical Position (BTP) 9.5-1, Appendix A (see Safety Evaluation Report dated December 12, 1978). The supplement to the SER, dated February 13, 1981, states that these modifications have been completed and the KNPP Fire Protection Program meets the criteria of Appendix A of BTP 9.5-1 and is therefore acceptable. This proposed change to the KNPP Operating License is administrative only and is in accordance with Generic Letter 86-10 and 88-12 guidelines for incorporating the Fire Protection Program into the USAR. The KNPP Fire Plan has been incorporated into the KNPP Updated Safety Analysis Report (USAR) by reference (see letter from K. H. Evers to Document Control Desk dated July 29, 1990). The proposed new license condition insures that the KNPP Fire Plan is implemented and maintained as approved in the Safety Evaluation Report dated November 25, 1977 and December 12, 1978 (and supplement dated February 13, 1981). This change will insure that the KNPP Fire Plan, including the systems, administrative and technical controls, the organization, and other plant features associated with fire protection will be on a consistent status with other plant features described in the USAR. Also, the provisions of 10 CFR 50.59 will apply directly for changes

made to the Fire Protection Program that would not adversely affect the ability to achieve and maintain safe shutdown. Since all existing requirements have been retained, no safety implications are involved with this change.

Significant Hazards Determination

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The previous Section 2.C.(3) license condition has been satisfied in accordance with the supplement to the SER dated February 13, 1981. The proposed new license condition is in accordance with Generic Letter 86-10 and 88-12 guidelines and is strictly administrative; therefore, it will not significantly increase the probability or consequences of an accident previously evaluated.
- 2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change does not involve any physical alterations of plant configurations, changes to setpoints, or operating parameters. It is an administrative change only and retains all existing fire protection requirements, therefore, it does not create the possibility of a new or different kind of accident.
- 3) The proposed change does not involve a significant reduction in a margin of safety. This change is in accordance with Generic Letter 86-10 and 88-12 guidelines for incorporating the Fire Protection Program into the KNPP USAR. This change is administrative only and insures that the KNPP Fire Plan will

be on a consistent status with other plant features described in the USAR. The KNPP Fire Plan retains all existing Fire Protection requirements and therefore an equivalent level of protection has been assured without a reduction in a margin of safety.

Description of the Proposed Change: 3.15 Fire Protection System - Pages TS 3.15-1, 3.15-2, 3.15-3, 3.15-4, Table TS 3.15-1, 3.15-2

This amendment proposes to delete Technical Specification 3.15 in its entirety.

Safety Evaluation

In accordance with the guidance of Generic Letter 88-12 the Limiting Conditions for Operation (LCO) associated with fire detection systems, fire suppression systems, and fire barriers could be relocated from the Technical Specifications (TS). TS Section 3.15, Fire Protection System, has been relocated into the KNPP Fire Plan. The intent of the existing specifications remain intact and provides an equivalent level of protection; therefore, this proposed change is administrative in nature and does not adversely affect the ability to achieve and maintain safe shutdown and has no adverse affect on the public's health and safety.

Significant Hazards Determination

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. In accordance with the guidance of Generic Letter 88-12, the LCOs associated with the Fire Protection System could be relocated from the TS. The Section 3.15 Fire Protection System TS has been relocated to the KNPP Fire Plan. This change is administrative only and does not affect plant operations.

- 2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed TS change does not involve any physical alterations of plant configurations, changes to setpoints, or operating parameters. This change is consistent with the guidance of Generic Letter 88-12.

- 3) The proposed change does not involve a significant reduction in a margin of safety. The proposed TS change is administrative only and is in accordance with Generic Letter 88-12. The specifications in this TS section have been incorporated into the KNPP Fire Plan and the Fire Plan is referenced in the USAR, therefore, an equivalent level of protection has been assured.

Description of the Proposed Change: Page TS 4.6-2

This amendment proposes to delete TS 4.6.a.7 which states that during each operating cycle (not to exceed 18 months), a checkout of emergency lighting will be performed.

Safety Evaluation

10 CFR 50 Appendix R requires emergency lighting units with at least an 8-hour battery power supply to be provided in all areas needed for operation of safe shutdown equipment and in access and egress routes thereto.

The TS requirement to periodically test the emergency lighting has been incorporated into the KNPP Fire Plan. This requirement states that the fixed, sealed beam emergency lamps with an 8-hour minimum battery power supply shall be demonstrated operable at least once per 12 months and an 8-hour minimum load

test shall be performed at least once per 5 years. These emergency lamps were installed under 10 CFR 50 Appendix R and are deployed to provide the required illumination during an emergency. Testing the battery-powered emergency lamps once every 12 months is more conservative than the original TS requirement of "not to exceed 18 months" and thus provides an equivalent level of protection.

Significant Hazards Determination

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. Generic Letter 88-12 encourages licensees to remove unnecessary fire protection technical specifications and incorporate the TS requirements into the Fire Protection Program. The TS requirement to periodically test the emergency lighting system has been incorporated into the KNPP Fire Plan, as referenced by the KNPP USAR. This change is administrative only and does not affect current plant practices.

- 2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed TS change does not involve any physical alterations of plant configurations, changes to setpoints, or operating parameters. This change is consistent with the guidance of Generic Letter 88-12.

- 3) The proposed change does not involve a significant reduction in a margin of safety. The proposed TS change is administrative only and is in accordance with Generic Letter 88-12. The requirement of this TS has been incorporated into the KNPP Fire Plan, as referenced in the KNPP USAR, and therefore assures an equivalent level of protection.

Description of the Proposed Change: 4.15 Fire Protection System - Pages 4.15-1, 4.15-2, 4.15-3, 4.15-4

This amendment proposes to delete technical specification 4.15 in its entirety.

Safety Evaluation

In accordance with the guidance of Generic Letter 88-12, the surveillance requirements associated with fire detection systems, fire suppression systems, and fire barriers could be relocated from the TS. The section 4.15, Fire Protection System TS has been relocated into the KNPP Fire Plan. The intent of the existing specifications remain intact and provides an equivalent level of protection. Therefore, this proposed change is administrative in nature and does not adversely affect the ability to achieve and maintain safe shutdown and has no adverse affect on the public's health and safety.

Significant Hazards Determination

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. In accordance with the guidance of Generic Letter 88-12 the Limiting Conditions for Operation associated with the fire protection systems could be relocated

from the TS. The section 4.15 Fire Protection System TS has been relocated to the KNPP Fire Plan. This change is administrative only and does not affect current plant practices.

- 2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed TS change does not involve any physical alterations of plant configurations, changes to setpoints, or operating parameters. This change is consistent with the guidance of Generic Letter 88-12.
- 3) The proposed change does not involve a significant reduction in a margin of safety. The proposed TS change is administrative only and is in accordance with Generic Letter 88-12. The specifications in this TS section have been incorporated into the KNPP Fire Plan and the Fire Plan is referenced in the USAR, therefore, an equivalent level of protection has been assured.

Description of Proposed Change: Page Table TS 4.1-3

This amendment proposes to delete Item #7 from Technical Specification Table 4.1-3, Minimum Frequencies for Equipment Tests.

Safety Evaluation

In accordance with the guidance of Generic Letter 88-12, the surveillance requirements associated with fire detection systems, fire suppression systems, and fire barriers could be relocated from the Technical Specifications. The monthly operability test requirement of Item #7 of TS Table 4.1-3 has been incorporated into the KNPP Fire Plan. The intent of the existing specification

remains intact and provides an equivalent level of protection. Therefore, this proposed change is administrative only and does not adversely affect the ability to achieve and maintain safe shutdown and has no adverse effect on the public's health and safety.

Significant Hazards Determination

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. In accordance with the guidance of Generic Letter 88-12, the surveillance requirements associated with Fire Protection Systems can be relocated from the TS. The monthly operability test requirement of Item #7 of TS Table 4.1-3 has been incorporated into the KNPP Fire Plan. The intent of the existing specification remains intact and provides an equivalent level of protection. This change is administrative only and does not affect current plant practices.

- 2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed TS change does not involve any physical alterations of plant configurations, changes to setpoints, or operating parameters. This change is administrative only and is consistent with the guidance of Generic Letter 88-12.

- 3) The proposed change does not involve a significant reduction in a margin of safety. The proposed TS change is administrative only and is in accordance with Generic Letter 88-12. The requirements of this TS have been incorporated into the KNPP Fire Plan and therefore, an equivalent level of protection has been assured.

Description of Proposed Change: Pages TS 6-2, TS 6-2a

This amendment proposes to delete Technical Specification 6.2.2.g and 6.4.2 which outlines the requirements of the fire response team.

Safety Evaluation

In accordance with the guidance of Generic Letter 88-12, the fire brigade staffing requirements shall be incorporated into the Fire Protection Program. The requirements of TS 6.2.2.g and 6.4.2 have been incorporated into the KNPP Fire Plan. The intent of the existing specifications remains intact and provides the same level of protection. This change is administrative only and does not affect plant operations.

Significant Hazards Determination

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. In accordance with the guidance of Generic Letter 88-12, the fire brigade staffing requirements shall be incorporated in the Fire Protection Program. The requirements of TS 6.2.2.g and 6.4.2 have been incorporated into the KNPP Fire Plan as referenced in the KNPP USAR. This change is administrative only and does not affect plant operations.

- 2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed TS change does not involve any physical alterations of plant configurations, changes to setpoints, or operating parameters. This change is consistent with the guidance of Generic Letter 88-12.

- 3) The proposed change does not involve a significant reduction in a margin of safety. The proposed TS change is administrative only and is in accordance with Generic Letter 88-12. TS 6.2.2.g and 6.4.2 have been incorporated into the KNPP Fire Plan which is referenced by the KNPP USAR, therefore, an equivalent level of protection has been assured.

Description of Proposed Change: Page TS 6-4

This amendment proposes to add the KNPP Fire Plan to the list of plans in TS 6.5.1.6.e which the Plant Operational Review Committee (PORC) is responsible for reviewing.

Safety Evaluation

In accordance with the guidance of Generic Letter 88-12, the administrative controls section of the TS shall be augmented to support the Fire Protection Program. This letter states that the Onsite Review Group (PORC at KNPP) shall be given responsibility for the review of the Fire Protection Program and implementing procedures. This change to TS 6.5.1.6.e will insure that the KNPP Fire Plan is treated on an equal basis with the KNPP Security Plan and Emergency Plan. This change will provide administrative controls for the Fire Protection Program

that are equivalent to those for the other programs. This change is administrative only and does not decrease the level of safety of the plant.

Significant Hazards Determination

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. In accordance with the guidance of Generic Letter 88-12, the administrative controls section of the TS shall be augmented to support the Fire Protection Program. This change to TS 6.5.1.6.e will insure that the KNPP Fire Plan is treated on an equal basis with the KNPP Security Plan and Emergency Plan. This change will provide administrative controls for the Fire Protection Program that are equivalent to those for the other programs. This change is administrative only and does not affect the operation of the plant.
- 2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This change is administrative only and is consistent with the guidance of Generic Letter 88-12. This change does not involve any physical alterations of plant configurations, changes to setpoints, or operating parameters.
- 3) The proposed change does not involve a significant reduction in a margin of safety. The proposed change is administrative only and is in accordance with Generic Letter 88-12. This change will provide administrative controls for the Fire Plan that are comparable to those for the other programs and also assures an equivalent level of protection.

Attachment 2

To

Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC)

Dated

September 17, 1990

Proposed TS Amendment No. 96

Affected TS Pages

Operating License Page 4

TS ii

TS iii

TS vi

TS 3.15-1

TS 3.15-2

TS 3.15-3

TS 3.15-4

Table TS 3.15-1

Table TS 3.15-2

TS 4.6-2

TS 4.15-1

TS 4.15-2

TS 4.15-3

TS 4.15-4

Table TS 4.1-3 (Page 1 of 2)

TS 6-2

TS 6-2a

TS 6-4

- C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR, Chapter 1: Part 20, Section 30.34 of Part 30 Section 40.41 of Part 40, Section 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensees are authorized to operate the facility at steady state reactor core power levels not in excess of 1650 megawatts (thermal).

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 87, are hereby incorporated in the license. The licensees shall operate the facility in accordance with the Technical Specifications.

(3) Fire Protection

The Licensees shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the KNPP Fire Plan, and as referenced in the Updated Safety Analysis Report, and as approved in the Safety Evaluation Reports, dated November 25, 1977, and December 12, 1978 (and supplement dated February 13, 1981) subject to the following provision:

The Licensees may make changes to the approved Fire Protection Program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.