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 STEINHARDT, C.R.      Wisconsin Public Service Corp.  
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SUBJECT: Submits response to NRC request for addl info re Proposed Amend 102 to License DPR-43, changing Tech Spec Table 3.5-2 to revise nomenclature for permissive P-6 setpoint.

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September 4, 1991

10 CFR 50.92

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 102 to the Kewaunee Nuclear Power Plant (KNPP)  
Technical Specifications (TS); Request for Additional Information

Reference: Proposed Amendment 102 to the KNPP TSs; Letter from C. R. Steinhardt (WPSC)  
to Document Control Desk (NRC) dated June 4, 1991

The above reference proposed a change to the KNPP TSs Table TS 3.5-2 to revise the nomenclature for the permissive P-6 setpoint. This change was requested since the new fission detectors, which were installed during the 1991 refueling outage, provide indication in percent power versus the old detectors which provided indication in amps. The Safety Evaluation for the proposed change stated in part:

Since the new detectors indicate in percent power versus amps, the note is being revised to specify that the bypass condition is satisfied when 1 of 2 IR nuclear instrumentation channels indicates  $> 10^{-5}\%$  power. The neutron flux at  $10^{-5}\%$  power is comparable to  $10^{-10}$  amps; therefore, the revision is only a nomenclature change consistent with the display capabilities of the new neutron flux detectors.

During the review the NRC staff requested additional basis for stating that the two neutron flux values for permissive P-6 were comparable.

*Adol*  
*1/10*

Document Control Desk  
September 4, 1991  
Page 2

In response to the staff's question, comparable values were arrived at by equating the old scale in amps, and the new scale, in percent power. The old intermediate range (IR) instrumentation measured flux over an 8 decade range with an indication of  $10E-11$  to  $10E-3$  amps, with  $10E-3$  amps equal to 100% reactor power. The permissive P-6 was set at a value 7 decades below 100% reactor power. The basis for the P-6 setpoint is to verify that the IR channel is functional prior to disabling the source range trip. The new fission detectors measure flux over a nominal 10 decade range with an indication of  $10E-8\%$  to 200% reactor power. Therefore, when overlaying the indications of the old and new detectors,  $10E-5\%$  power, 7 decades below 100% power, is comparable to  $10E-10$  amps.

The approach of equating output indication is acceptable as both are logarithmic scales measuring comparable ranges of neutron flux. If you require additional information please contact me or a member of my staff.

Sincerely,

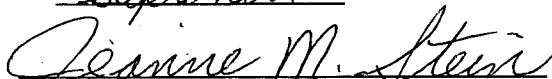


C. R. Steinhardt  
Senior Vice President - Nuclear Power

SLB/jms

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

Subscribed and Sworn to  
Before Me This 4<sup>th</sup> Day  
of September 1991



Jeanne M. Stein  
Notary Public, State of Wisconsin

My Commission Expires:  
June 18, 1995

LIC\NRC\N510