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WISCONSIN PUBLIC SERVICE CORPORATION

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

September 16, 1991

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> 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 KNPP Technical Specification Basis Revision

Reference: 1) Letter from K. H. Evers (WPSC) to Document Control Desk (NRC) dated July 19, 1991

Attached is a revision to page TS 3.4-2 of the Kewaunee Nuclear Power Plant's (KNPP) Technical Specification (TS). This page is part of the basis for Section 3.4, "Steam and Power Conversion System." In response to concerns identified during KNPP's 1991 refueling outage, the basis statements are being revised to correct the combined rated relief capacity of the ten main steam safety valves. The supporting 50.59 safety evaluation and documentation are on file at Wisconsin Public Service Corporation (WPSC). This correction was also submitted in Reference 1, WPSC's 1991 Updated Safety Analysis Report (USAR).

If you have any questions, please contact a member of my staff.

Sincerely,

PDR

K. H. Evers Manager - Nuclear Power

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BASIS

Two steam generators are required to be OPERABLE when the average reactor coolant temperature is > 350°F to ensure that sufficient heat removal capability exists for power operation and decay heat removal. Although one steam generator would provide sufficient decay heat removal capability, two steam generators are required in order to provide the necessary redundancy to meet the single failure criterion. An OPERABLE steam generator is defined by TS 3.4.a.1.

The ten main steam safety valves (five per steam generator) have a total combined rated capability of 7,660,380 lbs./hr at 1181 lbs. pressure. The maximum full-power steam flow at 1721 MWTH is 7,449,000 lbs./hr; therefore, the main steam safety valves will be able to relieve the total maximum steam flow if necessary. The requirement that five main steam safety valves per operable steam generator are available will assure sufficient steam relief capability.

Testing of the main steam system while the plant is in HOT SHUTDOWN conditions is permitted provided that at least two main steam safety valves associated with the steam generator under test are available to provide sufficient relief capacity to protect the system during the test.

In the unlikely event of complete loss of electrical power to the plant, continued capability of decay heat removal would be assured by the availability of either the steam-driven auxiliary feedwater pump or one of the two motor-driven auxiliary feedwater pumps, and by steam discharge to the atmosphere through the main steam safety valves. Each motor-driven pump is normally aligned with one steam generator; the discharge of the turbine-driven pump, which starts automatically, is manually valved as necessary to backup either or both motor-driven pumps, or to replace the standby function of either motor-driven pump when it is out of service. Any single auxiliary feedwater pump can supply sufficient feedwater for removal of decay heat from the reactor.

The specified minimum water supply in the condensate storage tanks is sufficient for ninety minutes of HOT SHUTDOWN plus a suitable margin to prevent loss of net positive suction head prior to switching suction to the Service Water System. Unlimited replenishment of the condensate storage supply is available from Lake Michigan through the Service Water System.

08/30/91