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SUBJECT: Proposed Amend 104 to License DPR-43, changing Tech Spec 6.2.3 to reflect recent organizational changes at util.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

November 20, 1991

10 CFR 50.90

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 104 to the Kewaunee Nuclear
Power Plant (KNPP) Technical Specifications

Reference: 1. Letter from K. H. Evers (WPSC) to Document Control Desk (NRC) dated
September 30, 1991

This proposed Technical Specification (TS) amendment is being submitted in accordance with
KNPP TS 6.2.3 to reflect recent organizational changes at Wisconsin Public Service Corporation
(WPSC), as discussed in Reference 1.

Attachment 1 to this letter contains a description, a safety evaluation, and a significant hazards
determination for each proposed change. Attachment 2 contains the affected TS section.

Please note that Section 6 was previously submitted on June 28, 1991 as part of Proposed
Amendment (PA) 103. The administrative changes to Section 6 being submitted at this time are
identical to those previously submitted with PA 103. The technical changes proposed by PA 103
are not included in this submittal.

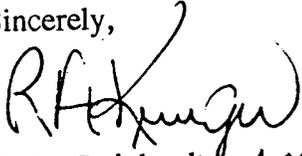
In accordance with the requirements of 10 CFR 50.30(b), this submittal has been signed and
notarized. A complete copy of this submittal has been transmitted to the State of Wisconsin as
required by 10 CFR 50.91(b)(1).

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MOD/

Document Control Desk
November 20, 1991
Page 2

Sincerely,



C. R. Steinhardt *for*
Senior Vice President - Nuclear Power

BJD/jms

Attach.

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 November 1991

Jeanne M. Steiner
Notary Public, State of Wisconsin

My Commission Expires:
June 18, 1995

LIC\NRC\N528

50-305

WPSC

KEWAUNEE

PROPOSED CHANGE TO TECH SPECS RE
ORGANIZATIONAL CHANGES

REC'D W/LTR DTD 11/20/91....9112270070

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ATTACHMENT 1

TO

Letter from C. R. Steinhardt (WPSC)

to

Document Control Desk (NRC)

Dated

November 20, 1991

PROPOSED TS AMENDMENT NO. 104

Description of Change, Safety Evaluation
and Significant Hazards Determination

Based on recent organizational changes within the Nuclear organization at Wisconsin Public Service Corporation (WPSC), changes are being proposed to maintain the accuracy of the Technical Specifications (TS). To assist in the review, the major organizational changes are discussed below.

The Senior Vice President - Nuclear Power will now have four persons reporting directly to him as follows:

1. Manager - Kewaunee Plant

Previously, the Manager - Kewaunee Plant reported to the Manager - Nuclear Power. This change in reporting structure will reduce the levels of management between the Plant and the Senior Vice President - Nuclear Power, which will improve communication and increase involvement of the Senior Vice President - Nuclear Power in the day-to-day operations of the plant. Reassignments have been made to allow the Manager - Kewaunee Plant to focus on plant operating activities.

2. Manager - Nuclear Plant Support Services

The current Manager - Nuclear Power will assume a new position entitled Manager - Nuclear Plant Support Services, located at the KNPP. Reporting to this position will be the Superintendent - Nuclear Information Systems, the Superintendent - Nuclear Training, the Superintendent - Plant Quality Programs, the Security Director, and the Plant Personnel Supervisor. This change will reduce the responsibilities of the Manager - Kewaunee Plant which are not strictly associated with plant operations, allowing him to concentrate more on plant day-to-day operations.

3. Manager - Nuclear Engineering

The current Assistant Manager - Plant Operations is relocating to the corporate office as Manager - Nuclear Engineering. This change will bring those departments which report to the WPSC corporate offices under a single individual who will report to the Senior Vice President - Nuclear Power. Specifically, this change will consolidate the various engineering departments and self-assessment activities under one manager, thus enhancing communications between departments, which will result in better work coordination between the various organizations.

4. Superintendent - Quality Assurance

There are no changes associated with this position. The Superintendent - Quality Assurance will continue to report to the Senior Vice President - Nuclear Power at the corporate office.

Specifically, the changes that affect TS's are as follows:

Description of Proposed Change: Page TS 6.1-1

The title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant" in TS 6.1.

The titles "Manager - Kewaunee Plant" and "Plant Manager" are used interchangeably at WPSC. However, in order to avoid confusion and to maintain consistency throughout this document, the title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant".

The title of "Assistant Manager - Plant Services" is being deleted and the title of "Superintendent - Plant Instrument & Control" is being added in TS 6.1.d.

Formerly, the succession of Manager - Kewaunee Plant included the Assistant Manager - Plant Services. However, this position has been eliminated. The Chemistry and Radiation Protection groups, which formerly reported to this position, now report to the Manager - Kewaunee Plant. The Security group now reports to the Manager - Nuclear Plant Support Services.

The Superintendent - Plant Instrument and Control will be designated in the Manager - Kewaunee Plant succession in lieu of the Assistant Manager - Plant Services. This position reports directly to the Manager - Kewaunee Plant and has overall responsibility for plant instrument and control, plant instrument and control engineering, and nuclear computer systems. This position is assigned broad responsibilities for direction of major aspects of the nuclear power plant activities and satisfies the requirements of ANSI N18.1-1971 for a manager's position.

4. Superintendent - Quality Assurance

There are no changes associated with this position. The Superintendent - Quality Assurance will continue to report to the Senior Vice President - Nuclear Power at the corporate office.

Specifically, the changes that affect TS's are as follows:

Description of Proposed Change: Page TS 6.1-1

The title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant in TS 6.1."

The titles "Manager - Kewaunee Plant" and "Plant Manager" are used interchangeably at WPSC. However, in order to avoid confusion and to maintain consistency throughout this document, the title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant".

The title of "Assistant Manager - Plant Services" is being deleted and the title of "Superintendent - Plant Instrument & Control" is being added in TS 6.1.d.

Formerly, the succession of Manager - Kewaunee Plant included the Assistant Manager - Plant Services. However, this position has been eliminated. The Chemistry and Radiation Protection groups, which formerly reported to this position, now report to the Manager - Kewaunee Plant. The Security group now reports to the Manager - Nuclear Plant Support Services.

The Superintendent - Plant Instrument and Control will be designated in the Manager - Kewaunee Plant succession in lieu of the Assistant Manager - Plant Services. This position reports directly to the Manager - Kewaunee Plant and has overall responsibility for plant instrument and control, plant instrument and control engineering, and nuclear computer systems. This position is assigned broad responsibilities for direction of major aspects of the nuclear power plant activities and satisfies the requirements of ANSI N18.1-1971 for a manager's position.

Description of Proposed Change: Page TS 6.2-2

The words "that are described in the Technical Specifications" are being added to TS 6.2.c.

This statement clarifies that organizational changes not affecting safety that are described in the Technical Specifications will be reported to the Commission within 60 days of implementation. Organizational changes not affecting safety which are not described in the Technical Specifications will be reported to the Commission by means of the OQAP Description at least annually in accordance with 10 CFR 50.54(a)(3).

Description of Proposed Change: Page TS 6.4-1

The title of "Training Supervisor" is being changed to "Manager - Nuclear Plant Support Services" in TS 6.4.

The nuclear training department is now under the responsibility of the Manager - Nuclear Plant Support Services. This is a new position developed to reduce the responsibilities of the Manager - Kewaunee Plant which are not strictly associated with plant operations.

Description of Proposed Changes: Page TS 6.5-1

The title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant" in TS 6.5.a.1, 6.5.a.2, and 6.5.a.6.A."

The titles "Manager - Kewaunee Plant" and "Plant Manager" are used interchangeably at WPSC. However, in order to avoid confusion and to maintain consistency throughout this document, the title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant".

The required members of PORC have been changed in TS 6.5.a.2 to reflect the recent organizational changes. The list of required members has also been rearranged to appear in the same order as TS 6.1.

The position of Assistant Manager - Plant Services and the position of Superintendent - Plant Information Systems have been deleted from the list of required PORC members and the Superintendent - Plant Radiation Protection has been added. This reduces the number of required PORC members from eight to seven. This reduction of one member presents no safety concern as PORC continues to be composed of representatives from

the Maintenance, Instrument & Control, Operations, Radiological Services, and Quality Programs (Quality Control and Inservice Inspections) departments. The reduction in the number of required PORC members also has no effect on the number of members required to make up the quorum.

The title of "Supervisor - Plant Quality Programs" has been changed to "Superintendent - Plant Quality Programs" in TS 6.5.a.2.

Due to the reorganization, the former "Supervisor - Plant Quality Programs" has been promoted to the position of "Superintendent - Plant Quality Programs".

The words "for required members" have been added to TS 6.5.a.3.

These words have been added to clarify that no more than two alternates for "required" members shall participate in PORC meetings at any one time. Additional alternates for "regular" members may also participate.

TS 6.5.a.5 has been revised to clarify a PORC quorum.

The quorum statement has been revised to clarify that the quorum consists of the chairman (or his designated alternate) in addition to a majority of the required members.

Description of Proposed Changes: Page TS 6.5-2

The title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant" in TS 6.5.a.7.A, and in two places in TS 6.5.a.7.C.

The titles "Manager - Kewaunee Plant" and "Plant Manager" are used interchangeably at WPSC. However, in order to avoid confusion and to maintain consistency throughout this document, the title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant".

The title of "Manager - Nuclear Power" is being changed to "Senior Vice President - Nuclear Power" in TS 6.5.a.7.C. and TS 6.5.a.8.

With the reorganization, the Manager - Kewaunee Plant now reports directly to the Senior Vice President - Nuclear Power. The Senior Vice President - Nuclear Power will be kept informed of PORC activities.

Description of Proposed Changes: Page TS 6.5-3

The Power Systems Engineering group has been deleted from the list of corporate support staff in TS 6.5.b.2.

The Power Systems Engineering group has been removed from the list of Corporate Support Staff, as the group now reports directly to the Substation and Transmission group.

Description of Proposed Change: Page TS 6.14-1

"Administrative Control Directives" has been changed to "nuclear administrative directives" in TS 6.14.

WPSC is in the process of implementing a consolidation of plant Administrative Control Directives (ACD's) and corporate Engineering Control Directives (ECD's) into Nuclear Administrative Directives (NAD's) with appropriate implementing procedures. Until this process is complete, all ECD's, ACD's, and NAD's referenced in TS's will be referred to as "nuclear administrative directives". The consolidation of ECD's and ACD's into NAD's is being made to eliminate duplicate directives and provide for more efficient control over directives. Approval of NAD's will be given to the appropriate responsible manager. This change is also being incorporated into the Operational Quality Assurance Program Description in accordance with 10 CFR 50.54(a)(3).

Safety Evaluation for Proposed Changes to TS Section 6.0

This proposed amendment reflects organizational changes which have been made at Wisconsin Public Service Corporation in order to reduce the layers of management and to provide greater management involvement in the various plant departments.

These proposed amendment changes are necessary to maintain the accuracy of the Technical Specifications and do not change the intent of the existing specifications, or represent a decrease in the engineering, technical, or management support for the Kewaunee Plant. Therefore, they have no safety significance.

Administrative changes are being made to convert TS Section 6.0 to the Word Perfect format and correct minor typographical errors and format inconsistencies. Among these changes are renumbering the existing specifications in a manner consistent with other TS Sections. These proposed amendment changes are necessary to maintain the accuracy of the Technical Specifications.

The entire Section 6.0 was previously submitted to the NRC on June 28, 1991 as Proposed Amendment (PA) 103. The formatting changes that are being submitted in this PA are identical to those previously submitted with PA 103.

However, in this proposed amendment, two administrative changes also affect PA 103. The first change is the title change in TS 6.5.c.3 and TS 6.6.b. The title of "Vice President - Nuclear Power" has been changed to "Senior Vice President - Nuclear Power. This change is reflected in both proposed amendments.

The second change which affects both this proposed amendment and PA 103 is the revision to TS 6.9.a.3 which corrects the address for the submittal of the monthly operating report. This change is also reflected in both proposed amendments.

These administrative changes have been reviewed to ensure they do not alter the intent or interpretation of the specification; therefore, there is no impact on public health or safety.

Significant Hazards Determination for Proposed Changes to TS Section 6.0

This proposed amendment reflects organizational changes at Wisconsin Public Service Corporation. These revisions do not change the intent of the Technical Specifications or decrease WPSC's management support or involvement in activities at the Kewaunee Plant.

Therefore, the proposed changes pose no significant hazards for the following reasons:

1. The proposed changes will not result in a significant increase in the probability of occurrence or consequences of an accident.
2. The proposed changes will not create the possibility of a new or different kind of accident from any previously analyzed.
3. The proposed changes will not involve a significant decrease in the margin of safety.

The proposed changes are similar to example C.2.e.i in 51 FR 7751. Example C.2.e.i is given to describe purely administrative changes that are, therefore, not likely to involve a significant hazard.

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