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See WCAP 13257P
WCAP 13229P

SUBJECT: Application for amend to License DPR-43,consisting of Proposed Amend 107 to Tech Specs to revise current heatup & cooldown limit curves.

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

May 27, 1992

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 107 to the Kewaunee Nuclear Power Plant
Technical Specifications, Revised Heatup and Cooldown Limit Curves

References: 1) Letter from K. H. Evers (WPSC) to Document Control Desk (NRC) dated September 19, 1989

This proposed amendment is being submitted to revise the current heatup and cooldown limit curves for the Kewaunee Nuclear Power Plant (KNPP). The current limit curves are expected to expire in November, 1992.

The KNPP Technical Specifications require that reactor coolant temperature, pressure, and system heatup and cooldown rates be limited in accordance with the heatup and cooldown curves. The current curves were determined in 1986 to be applicable until 15 effective full power years (EFPY). This determination was based on revision 2 of Regulatory Guide 1.99 and information available at that time concerning the limiting reactor vessel circumferential weld.

By letter dated September 19, 1989 (reference 1), in accordance with 10 CFR 50.61, Wisconsin Public Service Corporation (WPSC) submitted projected values of reference temperature RT_{PTS} to the Nuclear Regulatory Commission (NRC). These projected values were based on reactor vessel weld chemistry assumptions that were different than those utilized in construction of the current heatup and cooldown limit curves. Since that time, WPSC has implemented flux

A001
1/1

reduction core designs and has re-evaluated the reactor vessel weld chemistry. The reevaluation resulted in a new material content. The bases for the new material content and neutron exposure projections are provided in Attachment A.

The heatup and cooldown curves proposed by this amendment are valid to 20 EFPY and are based on the revised neutron exposure predictions and material content, Appendix G to the ASME Code, Chapter 5.3.2 in NRC Regulatory Standard Review Plan, and NRC Regulatory Guide 1.99 Revision 2. When compared to the current curves, all the limit lines on the proposed curves, including the in-service leak test and criticality limits, have shifted to the right, thereby ensuring operation at a higher temperature, i.e., above the nil-ductility transition temperature. The basis for the preparation of the proposed curves is set forth in Attachment B.

In accordance with 10 CFR 50.61, WPSC has revised projected reference temperature RT_{PTS} values for KNPP reactor vessel beltline materials. This rule requires submittal of these values with the next update of the pressure-temperature limits, or the next reactor vessel surveillance report, or 5 years from the effective date of this rule, whichever comes first. Reference temperature RT_{PTS} values for current life (I5 EFPY), end of life (32 and 34 EFPY), and the methodology for calculating RT_{PTS} is also set forth in Attachment B.

The following Technical Specification pages are affected by Proposed Amendment No. 107.

Table of Contents
TS 3.1-I through TS 3.1-20
Figures TS 3.1-1 and TS 3.1-2

A description of the specific changes, along with the appropriate safety evaluations, significant hazards determinations, and environmental considerations are included in Attachment C to this letter. Attachment D provides the affected pages of Proposed Amendment No. 107. Please note that Section 3.1 has previously been submitted to the NRC as part of proposed amendments (PA) 101, PA 103, and PA 105. The formatting and administrative changes being submitted at this time are identical to those previously submitted. The technical changes proposed by PA 101, PA 103, and PA 105 are not included as part of this amendment request.

It should also be noted that WPSC is currently evaluating the Low Temperature/Overpressure Protection (LTOP) used for the KNPP based on the heatup and cooldown limit curves proposed by this amendment. Proposed technical specifications will be forthcoming on the LTOP system.

As required by 10 CFR 50.91(b)(1), a copy of this applieation and significant hazards determination is being sent to the Public Service Commission of Wisconsin.

Sincerely,

C. R. Steinhardt
Senior Vice President - Nuclear Power

CAT/jac

Attach.

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

Subscribed and Sworn to
Before Me This 27th Day
of May 1992

Notary Public, State of Wisconsin

My Commission Expires:
June 18, 1995

LIC\NRC\N16.WP

ATTACHMENT B

To

Proposed Amendment No. 107

Letter from C. R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Dated May 27, 1992

Heatup and Cooldown Limit Curves for Normal Operation

WCAP-13229,

Evaluation of Pressurized Thermal Shock

WCAP-13257,

and

RT_{PTS} Values for Current Life (15 EFPY)

Letter from J. M. Chicots (Westinghouse Electric Corporation)

to C. A. Tomes (WPSC) dated May 22, 1992

Westinghouse Electric Corporation

Energy Systems

Nuclear and Advanced Technology Division

Box 598
Pittsburgh Pennsylvania 15230-0598

FDSD-SRPLO-150(92)

May 22, 1992

Mr. Chuck Tomes
600 North Adams Street
P.O. Box 19002
Greenbay, Wl 54307-9002

Dear Mr. Tomes:

Attached is a table of the RT_{PTS} values calculated for the Kewaunee plant for their current life (15 EFPY). The fluence values was projected based on the implementation of Core 1 fuel design at Cycle 16 and include an adjustment factor of 1.167 for biases observed between cycle specific calculations and the results of neutron dosimetry. These fluence projections were based on the same assumptions used in WCAP-13257, "Evaluation of Pressurized Thermal Shock for 32 and 34 EFPY for Kewaunee". If you have any questions or need additional information please contact me at (412) 374-4252 or Maria Ramirez at (412) 374-5111.

Sincerely,

Johnna M. Chicots

Johnna M. Chicots

Attachment

/jlh

0124J-JC52292

RT_{PTS} VALUES FOR KEWAUNEE FOR 15 EFPY

Material Description	Cu%	Ni%	CF	Initial RT_{NDT}	Margin	RT_{PTS} (°F)
Intermediate Shell	0.06	0.71	37	60	34	138
Lower Shell	0.06	0.75	37	20	34	98
Circumferential Weld	0.283	0.745	191.27	-56	66	236*

* This value was calculated based on surveillance capsule data. If surveillance capsule data is not used the RT_{PTS} value for the circumferential weld would be 259°F.

ATTACHMENT A

To

Proposed Amendment No. 107

Letter from C. R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Dated

May 27, 1992

Bases for Material Content and Neutron Exposure Projections

Introduction

The proposed heatup and cooldown limit curves were prepared in accordance with methods derived from Appendix G in the 1986 Edition of Section III of the ASME Boiler and Pressure Vessel Code; NRC Regulatory Guide 1.99, Revision 2; and NRC Standard Review Plan Chapter 5.3.2. This document summarizes assumptions used in the development of the revised heatup and cooldown limit curves. Specifically, the following three areas are discussed:

- Nickel and copper content of the limiting reactor vessel material,
- Neutron fluence projection used in calculating NRC Regulatory Guide 1.99, Revision 2 reference temperature, and
- Application of lower leakage core design at cycle 23 and all subsequent fuel cycles.

Nickel and Copper Content

The limiting reactor vessel material is the beltline circumferential weld. The KNPP reactor vessel was manufactured without beltline longitudinal welds. The KNPP beltline weld was fabricated from B-4 MOD wire (heat IP3571) and LINDE 1092 flux (LOT 3958). The Maine Yankee reactor vessel also has a weld fabricated from the same wire and flux combination.

Radiation surveillance capsule programs at both the Kewaunee and Maine Yankee reactor vessels include weldment samples made from weld wire and flux representative of that used in the original fabrication.

Vessel fabricator (Combustion Engineering, Inc.), supplier (Westinghouse Electric Corporation), Maine Yankee, and Wisconsin Public Service have performed chemical analysis on eighteen (18) samples that represent the KNPP limiting reactor vessel material. The mean as-deposited chemistry values for copper and nickel content, which are obtained by averaging the eighteen (18) data points, are 0.283 wt% and 0.745 wt%, respectively. Results of these chemical analysis are provided in Table A-1 of WCAP-13257 which is included under Attachment B to this letter.

Neutron Exposure Projections

Two approaches are utilized to account for the effect of neutron fluence on the reactor pressure vessel. The first approach uses neutron sensors as part of the radiation surveillance program. To date, three radiation surveillance capsules have been removed from the Kewaunee reactor vessel. Neutron dosimetry values have been measured from these surveillance capsules.

The second approach involves projecting neutron fluence by calculation. Techniques used and results of calculated neutron exposure projections for the Kewaunee reactor vessel are provided in WCAP-13257.

The calculated neutron exposure projections were multiplied by a factor of 1.167 to adjust for differences observed between the cycle specific calculations and the results of neutron dosimetry for the first three surveillance capsules removed from the Kewaunee reactor vessel. The factor of 1.167 was derived by taking the average of the dosimetry measurements to calculation flux ratios (m/c) obtained from the dosimetry results of capsules V, R, and P removed from the Kewaunee reactor vessel.

Future Core Design Assumed

Calculated neutron exposure projections are based on recent implementation of a low leakage core design at fuel cycle 16 through cycle 22 and the future implementation of a lower leakage core design (or other methods that will result in lower neutron exposure) at cycle 23 and all subsequent fuel cycles. Cycle 16 through cycle 22 and cycle 23 and all subsequent fuel cycles assume the following cycle average fast neutron flux at the limiting vessel location 2.77E10n/cm-sec and 2.17E10n/cm-sec, respecitvely. The Kewaunee nuclear plant is currently in fuel cycle 18.

Summary

Assumptions described above were used to prepare the proposed heatup and cooldown limit curves.

ATTACHMENT C

To

Proposed Amendment No. 107

Letter from C. R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Description, Safety Evaluation, Significant Hazards Determination, and Environmental Considerations

TABLE OF CONTENTS

Proposed Amendment No. 107 to the KNPP Technical Specifications

The specific changes to this proposed amendment, along with their safety evaluations and significant hazards determinations, are identified below.

List of Figures

Page TS viii

Description of Change

The expiration date included in the titles corresponding to Figures TS 3.1-1 and TS 3.1-2 have been changed from 15 effective full power years (EFPY) to 20 EFPY. These changes make the titles located in the list of figures for Figures TS 3.1-1 and TS 3.1-2 consistent with the expiration date noted on the revised heatup and cooldown limit curves.

Safety Evaluation

This change is administrative in nature since it implements another Technical Specification change that has a determination of no significant hazard. The safety

analysis and significant hazards determination for the other change (revision to the heatup and cooldown limit curves) are provided under TS 3.1, Figures TS 3.1-1 and TS 3.1-2. In conclusion, this change is administrative in nature and involves no safety concern.

Significant Hazards Determination

The proposed change does not involve a significant hazards consideration because operation of the KNPP in accordance with this change would not:

1. Significantly increase the probability or consequences of an accident previously evaluated. This change achieves consistency with another portion of the Technical Specifications that has a determination of no significant hazard. Therefore, this change does not increase the probability or consequences of an accident.

2. Create the possibility of a new or different type of accident from any previously analyzed. Achieving consistency with another portion of the Technical Specifications that has a determination of no significant hazard does not create the possibility of a new or different kind of accident.

3. Significantly reduce the margin of safety as defined in the basis for any Technical Specification. This change ensures consistency with another portion of the

Technical Specifications that has a determination of no significant hazard. Therefore, the margin of safety is acceptable as discussed under the significant hazards determination for TS 3.1, Figures TS 3.1-1 and TS 3.1-2.

This change is required to achieve consistency with the revised heatup and cooldown limit curves and does not represent a significant hazards concern. The significant hazards determination for the revision to the curves is discussed under TS 3.1, Figures TS 3.1-1 and TS 3.1-2.

Section 3.1, Reactor Coolant System

TS 3.1, Page TS 3.1-5

Description of Change

The expiration date for the heatup and cooldown limit curves has been changed from 15 effective full power years (EFPY) to 20 EFPY. This makes TS 3.1.b.1 consistent with the expiration date noted on the revised heatup and cooldown limit curves.

Safety Evaluation

This change is administrative in nature since it implements another Technical Specification change that has a determination of no significant hazard. The safety analysis and significant hazards determination for the other change (revision to the heatup and cooldown limit curves) are provided under TS 3.1, Figures TS 3.1-1 and TS 3.1-2. In conclusion, this change is administrative in nature and involves no safety concern.

Significant Hazards Determination

The proposed change does not involve a significant hazards consideration because operation of the KNPP in accordance with this change would not:

1) Significantly increase the probability or consequences of an accident previously evaluated. This change achieves consistency with another portion of the Technical Specifications that has a determination of no significant hazard. Therefore, this change does not increase the probability or consequences of an accident.

2) Create the possibility of a new or different type of accident from any previously analyzed. Achieving consistency with another portion of the Technical

Specifications that has a determination of no significant hazard does not create the possibility of a new or different kind of accident.

TS 3.1, Figures TS 3.1-1 and TS 3.1-2

Description of Change

The previous heatup and cooldown curves have been replaced with revised limit curves which are valid to 20 EFPY. These curves have been prepared in a manner consistent with NRC Regulatory Standard Review Plan Chapter 5.3.2, "Pressure-Temperature Limits", Regulatory Guide 1.99, Revision 2, and ASME Boiler and Pressure Vessel Code Section III, Appendix G, 1986 Edition. The major differences in the preparation of the revised limit curves compared to the previous curves are:

1. The neutron fluences (E>1 MEV) were projected based on the recent implementation of a low leakage core design at fuel cycle 16 through cycle 22 and the future implementation of a lower leakage core design at cycle 23 and all subsequent fuel cycles.

2. The neutron exposure projections utilized for calculation of the Regulatory Guide 1.99, Rev. 2 reference temperature were multiplied by a factor of 1.167 to adjust

for biases observed between cycle specific calculations and the results of neutron dosimetry for the first three surveillance capsules removed from the Kewaunee reactor. The factor of 1.167 was derived by taking the average of the measured to calculation (M/C) flux ratios obtained from the dosimetry results of capsules V, R, and P removed from the Kewaunee reactor vessel.

3. Additional chemical analysis of irradiated Charpy V-notch specimens from radiation surveillance capsules from the Kewaunee plant and the Maine Yankee plant have been completed. With the additional data, the mean as-deposited chemistry values for copper and nickel content are 0.283 wt% and 0.745 wt%, respectively. Chemical values were determined per the method described in Appendix A of WCAP-13257 located under attachment B to this letter. The previous heatup and cooldown curves were based on a copper content of 0.24 wt% and nickel content of 0.78 wt%.

Safety Evaluation

The revised heatup and cooldown limit curves were developed to provide adequate margins of safety during any condition of normal operation, including anticipated operational occurrences and system hydrostatic tests. Radiological off-site exposure from these plant conditions do not exceed the guidelines of 10CFR100. Therefore, utilization

of these curves will not adversely impact the consequences of any of the accidents in the Kewaunee USAR.

The method used in preparing the heatup and cooldown limit curves is presented in Attachment B to this letter. The method used is consistent with ASME Boiler and Pressure Vessel Code Section III, Appendix G, NRC Regulatory Standard Review Plan Chapter 5.3.2, and Regulatory Guide 1.99, Revision 2. The safety factors and margins applied in the preparation of the limit curves meet the criteria set forth by these documents.

Application of a bias of 1.167 on fluence accounts for differences observed between cycle specific calculations and the results of neutron dosimetry obtained from removed surveillance eapsules.

Application of a low leakage core design at fuel cycle 16 through cycle 22 and future implementation of a lower leakage core design at cycle 23 and all subsequent fuel cycles decreases the rate of shift in transition temperature from ductile to non-ductile behavior.

The copper and nickel content was determined by averaging eighteen (18) data points that represent the KNPP limiting reactor vessel material. The combined affect of the new chemistry valves is more conservative then those used to develop the current heatup and

cooldown limit curves. The material values utilized in preparation of the revised limit curves were developed following the guidance of Regulatory Guide I.99, Rev. 2.

Therefore, the preparation of the heatup and cooldown limit curves meet the applicable safety criteria and regulatory guidance and do not represent a safety concern.

Significant Hazards Determination

The proposed change does not involve a significant hazards consideration because operation of the KNPP in accordance with this change would not:

1) Significantly increase the probability or consequences of an accident previously evaluated. The revised heatup and cooldown limit curves were prepared using methods derived from the ASME Boiler and Pressure Vessel Code and the criteria set forth in NRC Regulatory Standard Review Plan 5.3.2. Utilization of the revised heatup and cooldown limit curves ensures adequate fracture toughness requirements for ferritic materials of the pressure-retaining components of the reactor coolant boundary. These limit curves provide adequate margins of safety during any condition of normal operation, including anticipated operational occuranees and system hydrostatic tests. Radiological off-site exposures from normal operation and operational transients, and faults of moderate frequency do not exceed the guidelines

of 10 CFR 100. With the preparation of the limit curves in accordance with the latest criteria and guidance, there is no significant hazards concern for any postulated change in the probability or consequences of an accident previously evaluated in the Kewaunee USAR.

2. Create the possibility of a new or different type of accident from any previously analyzed. The revised heatup and cooldown curves do not create the possibility of a new different type of accident. The curves were prepared in accordance with regulatory requirements and require plant operation within more limiting requirements to allow operation to 20 EFPY instead of 15 EFPY. Thus, no new or different type of accident has been created.

3. Significantly reduce the margin of safety as defined in the basis for any Technical Specification. The revised heatup and cooldown limit curves were prepared using methods derived from the ASME Boiler and Pressure Vessel Code, NRC Regulatory Guide 1.99, Revision 2. The safety factors and margins used in the development of the limit curves meet the criteria set forth by these documents. The bias which was applied to the neutron exposure projections accounts for differences observed between cycle specific calculations and the results of neutron dosimetry obtained from removed surveillance capsules from the Kewaunee reactor vessel. Applieation of low leakage core designs decreases the rate of shift in transition temperature from

ductile to nonductile behavior. The affect of the updated copper and nickel content is more conservative than that used to develop the current limit curves. The revised limit curves provide adequate margins of safety during any condition of normal operation, including anticipated operational occurrences and system hydrostatic tests. Radiological off-site exposures from normal operation and operational transients, and faults of moderate frequency do not exceed the guidelines of 10CFR100. With the preparation of the limit curves in accordance with the latest criteria and guidance, there is not a significant reduction in the margin of safety as defined in the basis for any Kewaunee Technical Specification.

Based on the safety evaluation and the above considerations, WPSC has determined that this change does not involve a significant hazards concern.

TS 3.1, Administrative Changes

Description of Change

Currently, the bases for TS Section 3.1 are interspaced throughout Section 3.1. This proposed change will combine and relocate these bases to the end of TS Section 3.1. In addition, administrative changes are being made to TS Section 3.1 as a result of the

conversion of Section 3.1 to Word Perfect format and are necessary to correct minor typographical errors and format inconsistencies.

Safety Evaluation

This proposed amendment includes administrative changes as a result of the conversion of Section 3.1 to the Word Perfect format and are necessary to correct minor typographical errors and format inconsistencies. These proposed amendment changes are also necessary to maintain the accuracy of the Technical Specifications.

These proposed changes do not change the intent of the existing specification, or represent a decrease in the engineering, technical, or management support for the Kewaunee Nuclear Power Plant. Therefore, they have no safety significance.

Significant Hazards Determination

This proposed amendment includes administrative changes as a result of the conversion of Section 3.1 to Word Perfect format, and are necessary to correct minor typographical errors and format inconsistencies. They 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.

T.S. Bases - Fracture Toughness Properties

Description of Change

The following changes were made to T.S. Bases - Fracture Toughness Properties.

- The edition of the ASME Boiler and Pressure Vessel Code (B&PVC) referenced under footnote six has been changed from the Summer 1984 Addenda to the 1986 Edition. The summer 1984 Addenda of Section III was used in development of the heatup and cooldown limit curves applicable up to 15 effective full power years

(EFPY). Development of the revised heatup and cooldown limit curves utilized the latest Code edition and addenda specified by 10CFR50.55a, Codes and Standards as required under 10 CFR 50.61, Fracture Toughness Requirements for Protection Against Pressurized Thermal Shock.

- The revision date of an ASTM Standard referenced under footnote seven has been changed from 1970 to 1986. The 1970 version of the ASTM standard was used in development of the heatup and cooldown limit curves applicable up to 15 EFPY. Development of the revised heatup and cooldown limit curves utilized data from analysis of reactor vessel material contained in Capsule P, the latest surveillance capsule removed from the Kewaunee reactor vessel. Analysis of Capsule P utilized the 1986 revision of ASTM E 262.

- Footnote eight has been updated to identify the report prepared to document the development of the revised heatup and cooldown limit curves. The old reference identified the report which documented preparation of the heatup and cooldown limit curves applicable up to 15 EFPY.

- The third paragraph on page TS 3.1-13 previously stated that the allowable pressure is taken to be the lesser of the two values taken from the curves under consideration. However, the revised basis explains that pressure-temperature curves

are generated for three scenarios: steady state, finite heatup rate assuming a 1/4 T-deep flaw at the ID surface, and finite heatup rate assuming a 1/4 T-deep flaw at the OD surface. A composite curve is then constructed based on a point-by-point comparison of the stcady-state and finite heatup rate data. Thus, at any given temperature, the allowable pressure is taken to be the lesser of the three values taken from the curves under consideration. To clarify how the allowable pressure is actually obtained for the heatup limit curves, the word "two" has been changed to "three".

- Changes on page TS 3.1-14 involved deletion of a reference to an outdated revision of the NRC Regulatory Standard Review Plan, addition of footnote nine, and revision of footnote ten.

To this end, the following words have been deleted (Directorate of Licensing, Section 5.3.2, "Pressure Temperature Limits" 1974). And footnote nine has been added to reflect the latest NRC Regulatory Standard Review Plan used in construction of the revised heatup and cooldown limit curves. Footnote ten is the same as footnote six which was previously discussed in this attachment. The edition of the ASME B&PVC referenced under footnote six has been changed from the summer 1984 Addenda to the 1986 Edition. The summer 1984 addenda of Section III was used in development of the heatup and cooldown curves for 15 EFPY.

Development of the revised heatup and cooldown curves utilized the latest edition and addenda specified by 10 CFR 50.55a, Codes and Standards as required under 10 CFR 50.61, Fracture Toughness Requirements for Protection Against Pressured Thermal Shock Events.

- Three changes were made to page TS 3.1-15.

The first change was made in the first sentence of the first paragraph. This change involved the following additions and sentence restructuring:

1. A comma (",") was added after "capsule V",

2. ("and") located between the "V" and "R" was deleted,

3. (", and P") was added after "R",

4. a comma (",") was added after "WCAP 8908(")",

5. the ("and") located after "WCAP 8908(")" was deleted, and

6. (" and WCAP 12020") was added just before "respectively".

The second change involved adding footnote thirteen in the second line of the first sentence to reflect all the radiation surveillance capsule reports used to develop the revised heatup and cooldown limit curves.

Finally, the expiration date for the heatup and cooldown curves, referenced in the second sentence of the first paragraph, has been changed from 15 EFPY to 20 EFPY.

Safety Evaluation

These changes to TS Bases - Fracture Toughness Properties are administrative in nature.

The change to footnote six is required to ensure the correct edition of the ASME Code is referenced by the bases.

The change to footnote seven is required to ensure the correct revision of ASTM E 262 is referenced by the bases.

The change to footnote eight is necessary to ensure that the basis accurately references the report used to document development of the revised heatup and cooldown limit curves.

The correction of the miswording ("Two" versus "three") improves the accuracy of the basis and does not affect the intent of the Technical Specification.

The deletion of the following words ("Directorate of Licensing, Section 5.3.2, "Pressure Temperature Limits" 1974) and the addition of footnote nine is provided to ensure the correct edition of the NRC Standard Review Plan is referenced by the basis.

The change to footnote ten is required to ensure the correct version of the ASME Code is referenced by the basis.

The change in wording "Capsules V, R, and P analyses are presented in WCAP 8908[12], WCAP 9878, and WCAP 12020[13], respectively" versus "capsules V and R analyses are presented in WCAP 8908[11] and WCAP 8978, respectively" improves the accuracy of the basis and does not affect the intent of the Technical Specification.

The addition of footnote thirteen was needed to reflect all the radiation surveillance capsule reports used to develop the revised heatup and cooldown limit curves.

The change in the expiration date is required to make the basis consistent with the revised curves which have a determination of no significant hazard.

None of these changes affect the meaning or intent of T.S. 3.1.b. All of these changes ensure consistency with the Technical Specifications and compliance with current regulatory guidance.

Environmental Considerations

This proposed amendment involves a change to an inspection requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. Wisconsin Public Service Corporation has determined that the proposed amendment involves no significant hazards considerations and no signifieant change in the types of any effluent that may be released off site and that there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, this proposed amendment meets the eligibility criteria for categorical evaluation set forth in 10 CFR 51.22(c)(9). This proposed amendment also involves changes in record keeping, reporting or administrative procedures or requirements. Accordingly, with respect to these items, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this proposed amendment.