

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

TO: Mr Schwencer

FROM: Wisconsin Public Service Corp  
Green Bay, Wis  
E W James

DATE OF DOCUMENT  
10-12-76

DATE RECEIVED 10-15-76

LETTER  
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1 signed

DESCRIPTION  
Ltr re their 8-25-76 ltr....furnishing info concerning limiting conditions for operation & surveillance testing of safety system filter systems.....

PLANT NAME: Kewaunee

ENCLOSURE

**DO NOT REMOVE**

**ACKNOWLEDGED**

SAFETY		FOR ACTION/INFORMATION		ENVIRO 10-15-76 ehf	
ASSIGNED AD:		ASSIGNED AD:			
BRANCH CHIEF:	<i>Schwencer (S)</i>	BRANCH CHIEF:			
PROJECT MANAGER:	<i>Neighbors</i>	PROJECT MANAGER:			
LIC. ASST.:	<i>Sheppard</i>	LIC. ASST.:			

INTERNAL DISTRIBUTION			
<input checked="" type="checkbox"/> REG FILE	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY &
<input checked="" type="checkbox"/> NRC PDR	HEINEMAN	TEDESCO	ENVIRO ANALYSIS
<input checked="" type="checkbox"/> I & E (2)	SCHROEDER	BENAROYA	DENTON & MULLER
<input checked="" type="checkbox"/> OELD		LAINAS	
<input checked="" type="checkbox"/> GOSSICK & STAFF	ENGINEERING	IPPOLITO	ENVIRO TECH
MIPC	MACCARRY	KIRKWOOD	ERNST
CASE	KNIGHT		BALLARD
HANAUER	SIHWEIL	OPERATING REACTORS	SPANGLER
HARLESS	PAWLICKI	STELLO	
PROJECT MANAGEMENT	REACTOR SAFETY	OPERATING TECH.	SITE TECH.
BOYD	ROSS	EISENHUT	GAMMILL
P. COLLINS	NOVAK	SHAO	STEP
HOUSTON	ROSZTOCZY	BAER	HULMAN
PETERSON	CHECK	BUTLER	SITE ANALYSIS
MELTZ		GRIMES	VOLLMER
HELTEMES	AT & I		BUNCH
SKOVHOLT	SALTZMAN		J. COLLINS ✓
	RUTBERG		KREGER

EXTERNAL DISTRIBUTION			CONTROL NUMBER
<input checked="" type="checkbox"/> LPDR: <i>Kewaunee, Wis</i>	NAT LAB:	BROOKHAVEN NAT LAB	<b>10454</b>
<input checked="" type="checkbox"/> TIC:	REG. VIE	ULRIKSON (ORNL)	
<input checked="" type="checkbox"/> NSIC:	LA PDR		
<input checked="" type="checkbox"/> ASLB:	CONSULTANTS		
<input checked="" type="checkbox"/> ACRS/6 CYS HOLDING/SENT	<i>To LA Sheppard</i>		

# WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

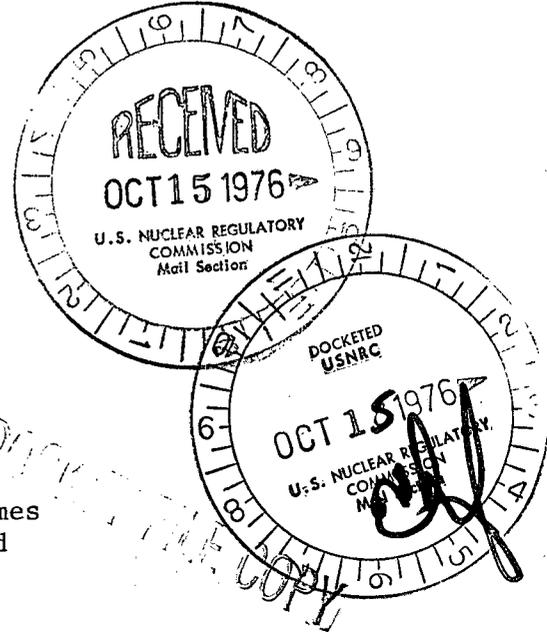
October 12, 1976

Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

ATTN: Mr. Al Schwencer, Chief  
Operating Reactors Branch #1  
Division of Operating Reactors

Gentlemen:

REF: Docket 50-305  
Operating License DPR-43  
Letter to Mr. Al Schwencer from Mr. E. W. James  
dated August 25, 1976, transmitting proposed  
Amendment No. 16 to Kewaunee Technical  
Specifications



The referenced letter transmitted proposed Amendment No. 16 to the Kewaunee Technical Specifications concerning changes in Limiting Conditions of Operation and Surveillance testing of safety system filter systems. In a recent phone conversation, further clarification was requested by the staff to explain why we proposed operating our Auxiliary Building Special Ventilation System (ASV) for ten minutes every month instead of the ten hours suggested by the staff's proposed change to Kewaunee Technical Specifications. The following comments address this issue.

When the ASV system is actuated, normal auxiliary building ventilation and air conditioning are completely cut off. Outside air is prevented from entering and only in-leakage air is discharged through the ASV filter system. This causes the following problems:

- 1) The Auxiliary Building temperature and humidity will rise to values depending on the amount of equipment operating and the number of hot pipes and other equipment in the area. This will lead to the degradation of non-safety but normally required operational equipment and instruments which are not designed to operate at temperatures which should only be encountered post-accident.
- 2) The high temperature and humidity conditions would be adverse to the health and safety of plant operations personnel who have to perform functions in this environment. Since the normal ventilation within the auxiliary building would be terminated, the operators would either be required to shut down some equipment processes or perform nearly continuous monitoring to assure damage is prevented.

10454

October 12, 1976

- 3) Rising temperatures will be enough, in certain conditions, to cause the actuation of the steam exclusion zones. Steam exclusion actuation anticipates a steam break in certain areas of the plant and automatically locks in the ASV system. This would be a situation which would necessitate defeating a safeguard system (ASV) in order to bring the plant back to normal operating conditions.
- 4) Air conditioning to the radioactive counting room would be cut off and the accuracy of the Ge(Li) detector system and other electronic detectors would be degraded with rising temperature and humidity conditions.
- 5) The hood fans in the sampling room would be lost and samples could not be taken during the period of time the ASV is operating.

When the ASV is actuated, the condenser air ejector-discharge is rerouted from the normal auxiliary building ventilation discharge to the ASV filtered discharge. The water vapor discharged through the HEPA and charcoal filters over a period of time would result in damage to the filters and would necessitate expensive changes without providing the designed short term protective function or any benefit in terms of safety.

For the above reasons we have requested that the ASV system test be limited to a 10-minute duration.

Very truly yours,



E. W. James  
Senior Vice President  
Power Supply & Engineering

EWJ:sna