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 MATHEWS, E.R. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Operating Reactors Branch 1

SUBJECT: Responds to 790801 request re submittal of proposed amend to incorporate requirements of secondary water chemistry monitoring as license condition. Amend 18 to Tech Specs adequately addresses safety issues.

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WISCONSIN PUBLIC SERVICE CORPORATION



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

November 6, 1979

Mr. A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Secondary Water Chemistry Monitoring

We have received and reviewed your August 1, 1979, request that we submit a proposed amendment to incorporate the requirements of secondary water chemistry monitoring as a condition of license for the Kewaunee Nuclear Power Plant. We have concluded that the Kewaunee Technical Specifications already incorporate requirements for Secondary Water Chemistry Monitoring. In response to your August 1976 letter we proposed and were issued Amendment No. 18 to the Kewaunee Technical Specifications. This amendment answers the NRC staff concerns that secondary monitoring requirements be made a part of the license and that provisions be made to detect steam generator tube degradation through eddy current testing. Clearly, all the safety issues identified by your August 1, 1979, request are already incorporated in our Technical Specifications.

In comparing our existing program to the model program you proposed, we offer the following comments:

1. Sample schedule is included in TS Table 4.1-2, and control points are identified but are not relevant to Technical Specifications.
2. Quantification of parameters are included in our Radio-Chemistry procedures.
3. Process sampling points are identified but are not relevant to Technical Specifications.
4. Records of data are maintained. Management of data is in accordance with our approved OQAP and is not relevant to Technical Specifications.

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5. Procedures defining corrective actions for off-normal conditions or similar procedures would be meaningless. Optimum steam generator chemistry depends on a balance of interrelated factors such as air in-leakage, chemical feed, power history, and blowdown history. An off normal parameter could be due to any one or combination of these factors so all data must be evaluated to determine a course of corrective action.
6. Administrative responsibility is already defined in Section 6 of the Technical Specifications and redundant lines of responsibility are not necessary.

Very truly yours,



E. R. Mathews, Vice President
Power Supply & Engineering

snf