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ACCESSION NBR:8001020312 DOC.DATE: 79/12/21 NOTARIZED: NO DOCKET #
 FACIL:50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305
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 SCHWENCER,A. Operating Reactors Branch 1

SUBJECT: Responds to 791218 telcon w/NRC.LOCA guidelines developed by owners group adequate to cope w/small break LOCA at facility.

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 TITLE: Resp to Lesson Learn Task Force - Westinghouse

NOTES: I & E - 3 Cys ALL MATL.

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WISCONSIN PUBLIC SERVICE CORPORATION



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

December 21, 1979

Mr. A. Schwencer
Operating Reactors Branch
U. S. Nuclear Regulatory Commission
Phillips Building
7920 Norfolk Avenue
Bethesda, MD 20014

Dear Mr. Schwencer:

Docket 50-305
Operating License DPR-43
Emergency Operating Procedures

This letter answers the questions received from the staff in a phone conversation on Tuesday, December 18, 1979.

1. Do we believe that the LOCA guidelines developed by the owners group are adequate for coping with a small break LOCA for our plant? Explain.

The guidelines developed by the owners group for a loss of reactor coolant accident (LOCA), E-1 loss of Reactor Coolant, are adequate to cope with a small break LOCA at the Kewaunee Plant. We have revised our emergency operating procedure for a LOCA based on the owners group E-1 guideline. We have not included E-1 verbatim because it is not consistent with our present procedure format. Only those steps which are essential and vital to the safety of the plant and its components should be placed in procedures. Notes and cautions which are of a training or general advisory nature do not serve a useful purpose in the procedure and are addressed in our operator training program. Placing numerous notes in a procedure tends to dilute the procedure, increasing the probability that an operator could neglect an important step or precautionary note. Therefore, the Kewaunee Emergency LOCA operating procedure notes are limited to critical precautionary considerations not addressed in other implementing procedures for coping with the event. We have also re-ordered some steps and reworded many steps to be consistent with our current procedural format and philosophy. Our revised emergency operating procedure for a LOCA has preserved the intent of E-1 and is adequate to handle a small break or large break LOCA. Our emergency operating procedure for a LOCA provides definitive direction to the operators which is consistent with accident analysis and system design that assures the maintenance of a heat sink and the

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protection of the facility from additional damage which could compromise public safety.

2. Identify how your LOCA procedure deviates substantively from the guidelines developed by the owners group (both omissions and additions).

The following list identifies the substantive deviations between E-1, Loss of Reactor Coolant, Revision 1 (with revised pages dated 10/29/79 and 11/02/79) and the Kewaunee Plant Emergency Operating Procedure. The page numbers refer to the pages of E-1.

These items from E-1 were not included in the Kewaunee LOCA Emergency Operating Procedure for the reasons addressed in (1) above:

- The caution on page 2 concerning diesel operation
- The four NOTES on page 2
- The first paragraph of step 1 and the NOTE following step 1 both on page 3
- The NOTE at the beginning of step 3 on page 3
- Step 9 on page 10
- Step 10 on page 10
- Steps 11, 12, 13 and 14 on pages 10 and 11

These items are in the Kewaunee LOCA emergency operating procedure, but are not in E-1:

A section on symptoms.

The immediate action section instructs the operator to verify automatic actions and to perform the immediate actions of the reactor turbine trip procedure.

Other Deviations:

The Kewaunee LOCA emergency operating procedure instructs the operator to trip the reactor coolant pumps upon safety injection actuation.

The Kewaunee LOCA emergency operating procedure does not address hot leg recirculation for the reasons addressed in the letter from Mr. E. W. James (WPSC) to Mr. R. A. Purple (NRC) dated April 18, 1975.

The Kewaunee LOCA emergency operating procedure has simplified the switchover to cold leg recirculation compared to the outline provided in E-1.

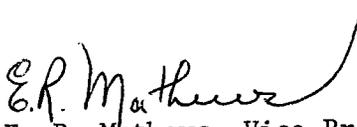
Mr. A. Schwencer
December 21, 1979
Page 3

3. Identify any operator training performed that would result in operator actions for recovery from a LOCA that are not in our procedures.

The Kewaunee Operator Training Program does not contain any training that would result in operator actions for recovery from a LOCA not consistent with the intent of our emergency operating procedures.

Our operator training emphasizes that the operator's primary objective is to assure the health and safety of the public and the plant by providing adequate core cooling. The training further emphasizes that adequate core cooling will be provided by maintaining the primary system inventory, by maintaining the secondary system inventory, and by establishing heat transfer from the primary to the secondary system. The operators are trained to maintain primary system inventory through the use of the safety injection system, to maintain secondary system inventory as indicated by steam generator level through the use of the feedwater system, and heat transfer from primary to secondary system during small break events is assured by use of steam dump to maintain the unaffected steam generator pressure below primary system pressure. Actions taken by the operator to achieve these objectives will not contradict the procedures because these objectives are the basis of the procedures. A copy of this letter will be circulated to the operators to reiterate this basic training.

Sincerely,


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

snf