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SUBJECT: Discusses implementation of improved range of radiation monitors per NUREG-0578.Several mods will be performed to reduce hazards that may be encountered during implementation.Mods should be completed by Apr-May,1981.

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November 14, 1980

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Improved Range of Radiation Monitors, NUREG 0578, Item 2.1.8.b

Our December 31, 1979, and April 3, 1980, letters concerning increased range of post accident effluent monitors addressed the concerns of NUREG 0578, item 2.1.8.b, and indicated we would provide increased range monitors on our containment building, auxiliary building, and steam line safety/relief valve effluent paths. The design of the Kewaunee Nuclear Plant includes a unique design in that a concentric concrete shield building completely encompasses the containment, with an accessible annulus area between them.

In our evaluations of accessibility to equipment, doses and dose rates to equipment in the auxiliary building, and minimizing the potential of radioactive releases to the environment in the event that a TMI-2 incident occurred at Kewaunee, it became readily apparent that several modifications could greatly reduce the hazards encountered.

These modifications are above and beyond the requirements and recommendations issued by the NRC for TMI lessons learned, and include collecting and rerouting the highly radioactive process liquids and gases back to containment instead of processing through the normal waste handling systems.

As mentioned, waste gases, if found highly radioactive, can be pumped back into containment for storage, decay and later release through filtered vents. In the event of exceedingly high pressure inside containment, the shield building

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annulus will be utilized as an alternate collection volume. With the additions of these modifications, the Shield Building Ventilation System exhaust becomes a potential release path for highly radioactive gases.

In applying the requirements and recommendations of NUREG 0578, Item 2.1.8.b, we intend to install high range radiation monitoring capability on the Shield Building Ventilation exhaust stack. Because the containment building ventilation exhaust and the shield building ventilation exhaust tie in to a common release path, a single monitor may be used to monitor both exhausts. Final designs are not yet complete, but we expect to complete designs, install and implement this equipment simultaneously with completion of the aforementioned modifications. If current delivery schedules for equipment are met, these modifications should be completed by the end of the next refueling outage scheduled for April-May, 1981.

Very truly yours,

C Kuma for E R Mathews

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

snf

cc - Mr. James G. Keppler, Reg Dir
Office of Inspection & Enforcement

Mr. Robert Nelson, NRC Resident Inspector
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