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SUBJECT: Discusses proposed Tech Specs,incorporating Lessons Learned items re emergency power supply requirements,valve position, instrumentation for inadequate core cooling,containment isolation,auxiliary feedwater, & sys integrity monitoring.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

December 23, 1980

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

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Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Plant
Proposed Technical Specification
Concerned Lessons Learned Items

Reference: Letter from D. G. Eisenhut to All PWR Licensees, July 2, 1980

In the referenced letter, you requested that we revise our technical specifications to incorporate the requirements of certain TMI-2 Lessons Learned category "A" items. Your letter also included proposed wording for the standard technical specification format. The Kewaunee technical specifications are not in the standard form, and, therefore, are not directly comparable to your proposed wording. We have reviewed your requests, and the specific items are discussed below.

1. Emergency Power Supply Requirements

The Kewaunee electric distribution system is described in section 8 of our FSAR. The pressurizer water level indicators are powered by a non-interruptible instrument bus which has a battery backed power supply, and ultimately, can be powered by the on-site emergency power supply (diesel generators). Furthermore, the pressurizer level indication is used in the reactor protection system, and, therefore, it is already included in our Technical Specifications (Table T.S. 3.5-2). We feel the staff's concerns in this area have been satisfied.

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The pressurizer power operated relief valves and their block valves are considered to be control components, and, as such, do not warrant inclusion in the technical specifications. This is based on the definition of a limiting condition for operation, as given in 10 CFR 50.36 (C) (2): "the lowest functional capability or performance levels of equipment required for safe operation of the facility." We do, however, recognize the importance of these components, and have upgraded them accordingly. Specifically, we have placed the block valves on an emergency power supply, and we have added air accumulators in line with the PORV's to assure their availability after containment isolation. We feel that this information is of a facility design nature, and, as such, should be placed in the appropriate sections of the FSAR. Our intention is to do this concurrently with the FSAR update program now in progress. This is also consistent with the proposed rule which was printed in the Federal Register on July 8, 1980. That rule advocated revising the Technical Specifications so that they would include only essential information. Information of a design nature would be properly placed in the FSAR.

We have also reviewed your request concerning emergency power supply requirements for the pressurizer heaters. The Kewaunee design includes emergency power supplies for some of the pressurizer heaters. We concur with the staff on the importance of pressurizer heater availability, and, therefore, propose that a specification should be in the Kewaunee Technical Specifications to insure that the minimum heater energy necessary to overcome ambient heat losses and to maintain pressurizer pressure is available. We are currently reviewing our startup test results to determine this number; a proposed technical specification concerning this will be submitted to the staff within 60 days of the date of this letter.

2. Valve Position

While we agree that PORV and Safety Valve position indication can be a diagnostic aid to the operator, we disagree with the staff's position that these indications should be incorporated in the technical specifications. There are other indications, such as pressurizer pressure and pressurizer level, which offer the operator the diagnostic tools to analyze an accident condition. Furthermore, while the subject indication does provide a diagnostic aid to the operator, it does not change his proper response to a Loss of Coolant Accident. Therefore, we do not feel that it is appropriate for inclusion in our technical specifications.

3. Instrumentation for Inadequate Core Cooling

We concur with the staff on the importance of determining if an inadequate core cooling condition exists. However, we feel that our current technical specifications include a sufficient number of instrumentation systems to allow the operator to make that determination; namely, pressurizer pressure and level and the RCS bypass manifold RTD's. In addition to this indication, the operator also has reliable instrumentation not included in the technical specifications,

such as core exit thermocouples and wide range RTD's to aid in that determination. We feel that the core subcooling meter (which calculates subcooling based on other plant parameters) is not essential for safe operation of the plant, and, therefore, does not warrant inclusion in the technical specifications.

4. Containment Isolation

The Kewaunee Technical Specifications provide the definition and requirements for containment isolation. Specifically, section 3.6 of the Kewaunee Technical Specifications provides the conditions under which containment integrity must be maintained, Table TS 3.5-4 provides the requirements concerning operability of containment isolation actuation instrumentation, and Technical Specification 1.0.g provides the definition of Containment System Integrity used at the Kewaunee Plant. We feel that a list of containment isolation valves is more appropriately contained in the FSAR. Our FSAR, table 5.2-2 provides a list of containment penetrations and their isolation valves. This list will be updated as necessary through our FSAR update program.

5. Auxiliary Feedwater

The Kewaunee auxiliary feedwater system is a safeguard system complete with safeguards actuation logic. The AFW system is described in section 6.6 of the FSAR. The safeguards actuation instrumentation systems are included in the technical specifications (Tables TS 3.5-2 and TS 3.5-3). We do not agree that AFW flow indication should be included in the technical specifications. We feel that steam generator level is a more direct indication of adequate heat sink, and, therefore, is more pertinent for inclusion in the technical specifications. Since our narrow range S/G level indication is safety grade and part of our reactor protections system, it is already in the technical specifications. We feel that the staff's concerns in this regard are satisfied.

6. Shift Technical Advisor

The requirement for a shift technical advisor was promulgated in the post-TMI period with the implementation of "Lessons Learned" items. Since that time there have also been various alternatives proposed by the staff which include upgrade of the shift supervisor. While we do not agree that a shift technical advisor is essential for the safe operation of the plant, and, therefore, should be included in the technical specifications, we recognize the benefit of the concept. Therefore, we have committed to the Shift Technical Advisor Program and will keep that commitment until a suitable alternate program is in place. Due to the interim nature of the position, we do not feel that a technical specification revision is warranted in this regard.

7. Systems Integrity and Iodine Monitoring

Technical specifications concerning system integrity and iodine monitoring, as proposed by the staff in enclosure 2 of the referenced letter, are not consistent with the definition of an LCO, as defined by 10 CFR 36 (c) (2). We agree that these concerns are valid, and, therefore, have instituted a program of preventive maintenance, and have provided iodine monitoring capability.

The preventive maintenance program was instituted prior to TMI, and we believe it to be of superior quality. Furthermore, in the interest of containing potentially radioactive leaking into the auxiliary buildings, we are currently implementing a design change to route such leakage back to the containment under accident conditions. In addition to these programs, the ISI program provides further assurance that the quality and integrity of systems will be maintained.

We have committed to implement the iodine monitoring capability as required by NUREG 0578 and its subsequent clarifications. We believe that our program sufficiently addresses the staff's concerns and no further action in this regard is necessary.

Sincerely,

E. R. Mathews

E. R. Mathews
Vice President
Power Supply & Engineering

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cc - Mr. Robert Nelson
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