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 EISENHUT, D.G. Division of Licensing

SUBJECT: Updates actions in response to NUREG-0737 requirements.
 Reactor operators & other plant personnel are learning use
 of installed equipment & sys to control or mitigate
 accidents causing severe damage.

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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

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WISCONSIN PUBLIC SERVICE CORPORATION


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

March 9, 1981

Mr. D. 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
 Kewaunee Nuclear Power Plant
NUREG-0737: Post TMI Requirements

- Reference: 1. D. G. Eisenhut's Letter to All Licensees Transmitting
 NUREG-0737
 2. Letter from E. R. Mathews to D. G. Eisenhut of January 5, 1981

This letter serves to provide you with an update of Wisconsin Public Service Corporation's actions in response to the requirements of NUREG-0737. We understand through discussions with your staff that you require additional information on the following items:

- I.A.2.1 Immediate Upgrading of Reactor Operator and Senior Reactor Operator Qualifications,
- II.B.4 Training for Mitigating Core Damage,
- II.D.1 Performance Testing of Boiling Water Reactor and Pressurized Water Reactor Relief and Safety Valves,
- II.F.2 Instrumentation for Detection of Inadequate Core Cooling, and
- III.D.3.4 Control Room Habitability Requirements.

Item I.A.2.1 Immediate Upgrading of Reactor Operator and Senior Reactor Operator Qualifications

As stated in our letter of January 5, 1981 (Reference 2), we have implemented items 1 and 3 identified in Item A.2.c of Enclosure 1 to Harold Denton's letter

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of March 28, 1980. While we are actually providing the training requested in these items, we have not revised and submitted the program description because of expected future revisions to provide training to control or mitigate an accident in which the core is severely damaged. We feel that because of the developmental work which is presently incomplete, in the latter regard, it is premature to submit a detailed program now. This is discussed more fully under Item II.B.4, below.

Apparently this attempt on our part to reduce redundant effort by planning only one submittal to satisfy this item, even though we have taken action, is unsatisfactory to the staff. Therefore, we will submit our modified program description which provides the documentation of the action taken to satisfy the requirements of Item A.2.c.1 and A.2.c.3 of Enclosure 1 to Harold Denton's March 28, 1980, letter by March 31, 1981.

Item II.B.4 Training for Mitigating Core Damage

Wisconsin Public Service Corporation is taking action to provide training to reactor operators and other plant personnel to teach the use of installed equipment and systems to control or mitigate accidents in which the core is severely damaged. However, we would like to point out that this item is closely related to Items I.A.2.1 and II.F.2 of NUREG-0737.

Item I.A.2.1 (sub-item A.2.C.2 of Enclosure 1 to Harold Denton's letter of March 28, 1980) requires this type of training for reactor operators. Item II.F.2, Instrumentation for Detection of Inadequate Core Cooling, most likely will result in procedures and analyses which will provide valuable input to this type of training. Therefore, the training program which will be developed now will be preliminary and contain general guidelines. This program will be augmented by appropriate results from other related work now in progress.

Wisconsin Public Service Corporation will provide modified operator requalification and reactor operator training programs by March 31, 1981, as noted in the discussion under Item I.A.2.1. These modified programs will also include a section on training for mitigating core damage, which will provide the basis of the program noted above. Additionally, a program will be developed by April 1, 1981, to provide general training in this area for other non-licensed plant personnel as deemed appropriate by Wisconsin Public Service Corporation. The training will be in the form of literature disseminated for review to those personnel and may be augmented by classroom sessions.

Item II.D.1 Performance Testing of Boiling Water Reactor/Pressurized Water Reactor Relief and Safety Valves

Our response to this item in Reference 2 stated that we cannot commit to specific dates to provide the documentation requested by NUREG-0737 because our reviews and analysis will be contingent upon the testing schedule set by EPRI. As you are aware, EPRI has set an ambitious schedule with no slack time to meet the

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requirements of NUREG-0578. That schedule currently calls for testing to continue through to July 1, 1981. The requirement that utilities provide a preliminary review by July 1, 1981, is clearly unreasonable. In his letter to D. G. Eisenhut of December 15, 1980, Mr. R. C. Youngdahl presented a schedule for plant specific responses. Wisconsin Public Service Corporation endorses that schedule, as summarized below:

July 1, 1981	Completion of EPRI Testing
January 1, 1982	Plant Specific Submittals Confirming Adequacy of Safety and Relief Valves Based on Licensee Preliminary Review of Generic Test Program Results
April 1, 1982	Plant Specific Reports for Safety and Relief Valve Qualification
July 1, 1982	Plant Specific Submittals for Piping and Support Evaluations

We believe this schedule represents a more realistic timetable for the licensees to perform the requested analyses than the schedule promulgated in NUREG-0737. We have contracted with a vendor to provide the plant specific analyses requested in this item.

Item II.F.2 Instrumentation for Detection of Inadequate Core Cooling

Wisconsin Public Service Corporation is continuing its efforts and has taken action in response to this item. We have participated in a feasibility study which successfully showed that a bottom level tap can be provided through the use of an instrumentation thimble. This tap could be utilized for a full-range dp level system. We have also maintained an on-going review of proposed systems and testing in an effort to determine which system will provide the least-ambiguous information to the reactor operator and will also comply with the requirements promulgated in NUREG-0737.

Based on the information available to date, Wisconsin Public Service Corporation believes the Heated Junction Thermocouple System (HJTC) will provide an acceptable system for detection of inadequate core cooling, as augmented by existing plant indications such as core-exit thermocouples, hot and cold leg RTD's, RCS pressure, etc. The HJTC system will provide an indication of reactor vessel water level above the top of the core. In the extremely unlikely event that the reactor vessel water level falls below the top of the core, core exit thermocouples may be used to deduce approximate level through a correlation utilizing degrees of superheat. This sort of "accessory information" would be developed as part of the HJTC system.

Wisconsin Public Service Corporation, in cooperation with several other utilities operating Westinghouse type PWR's, has contracted with Combustion Engineering to undertake a study which will determine the feasibility of utilizing the CE

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HJTC system in Westinghouse type PWR's. Upon completion of that study, Wisconsin Public Service Corporation will take further action to comply with this requirement.

Because of the continuing efforts and lack of a clearly acceptable system, it is unlikely that these requirements will be met by January 1, 1982. The feasibility study now in progress is tentatively scheduled for completion by August 1, 1981. An update on further Wisconsin Public Service Corporation's action will be provided at that time.

Item III.D.3.4 Control Room Habitability Requirements

In conjunction with the auxiliary building shielding review, Wisconsin Public Service Corporation also authorized our Architect/Engineer, Fluor Power Services, to perform a review of control room habitability. That review has been completed in regard to radiation exposure of control room occupants; a review of control room habitability in regard to toxic gases is continuing and is expected to be complete by March 31, 1981. Upon completion of that review, a report will be provided to the NRC. The delay in completion of this project has been caused by the heavy work burden on our technical staff and our Architect/Engineer due to increased regulatory requirements.

Very truly yours,

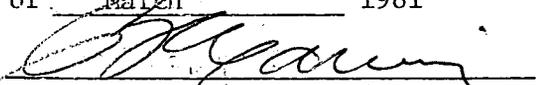


E. R. Mathews, Vice President
Power Supply & Engineering

snf

cc - Mr. Robert Nelson, NRC Resident Inspector
RR #1, Box 999, Kewaunee, WI 54216

Subscribed and Sworn to
Before Me This 9th Day
of March 1981


Notary Public, State of Wisconsin

My Commission Expires

Dec. 19, 1982