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 EISENHUT, D. G. Division of Licensing

SUBJECT: Discusses similarities of Kewaunee Tech Specs & STS Facility
 Tech Specs offer same degree of protection as STS &
 revisions unnecessary.

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WISCONSIN PUBLIC SERVICE CORPORATION



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

April 3, 1981

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

Dear Mr. Eisenhut:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
Letter from Mr. D. G. Eisenhut to Mr. E. R. Mathews of November 20, 1980



The subject of the above referenced letter has been reviewed. A comparison of Standard Technical Specifications (STS) and Kewaunee Technical Specifications has been made. Our comparison has shown that Standard Technical Specifications and Kewaunee Technical Specifications are quite similar.

The difference between our Technical Specifications and the STS is that some snubbers are required by the STS to be operable during cold shutdown and refueling modes; there is no such requirement at the Kewaunee Plant. There are no safety related snubbers at the Kewaunee Plant which would be needed solely for cold shutdown and refueling modes of operation. Snubbers which are required during these modes are also needed during power operations. Therefore, the appropriate time for inspection and maintenance of these snubbers is during cold shutdown and/or refueling modes of operation when the stored energy of the Reactor Coolant System is at a minimum.

The Action Statements, visual inspection requirements and functional testing requirements of the Kewaunee Technical Specifications offer the same degree of protection as the Standard Technical Specifications.

Mechanical snubbers are not employed at the Kewaunee Plant, therefore, Technical Specifications are not applicable.

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Mr. Darrell G. Eisenhut, Director
April 3, 1981
Page 2

Standard Technical Specifications require service life monitoring. This is considered unnecessary at the Kewaunee Nuclear Power Plant in that records required for Tech Spec snubber surveillance requirements provide the same information as service life monitoring would provide.

In conclusion, the Kewaunee Technical Specifications offer the same degree of protection as do the Standard Technical Specifications and revisions to our Technical Specifications are unnecessary.

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