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ACCESSION NBR:8108100347 DUC.DATE: 81/08/03 NOTARIZED: NO DUCKET # FACIL:50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Servic: 05000305 AUTH.NAME AUTHOR AFFILIATION MATHEWS,E.R. Washington Public Power Supply System RECIP.NAME: RECIPIENT AFFILIATION VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Clarifies 810731 commitments recontrol rod misalignments. Discusses interim actions taken to define alarm setpoints.

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WISCONSIN PUBLIC SERVICE CORPORATION

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



August 3, 1981

Mr. S. A. Varga, Chief
Operating Reactor Branch #1
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

8108100347 PDR ADOCK (

Docket 50-305 Operating License DPR-43 Kewaunee Nuclear Power Plant Rod Misalignment Concerns

Reference: Letter from E. R. Mathews (WPSC) to S. A. Varga (NRC), dated July 31, 1981

My letter of July 31, 1981, reported to you the interim actions to be taken by WPSC concerning control rod misalignment. Unfortunately, due to the short time available to prepare the letter after the discussions between our staffs on July 31st, there were some errors in the referenced letter. We apologize for the inconvenience this may have caused. This is to clarify the commitment we made in this regard.

Secondly, we immediately implemented the interim action after our discussions on Friday. Because some rods were indicating a misalignment from their bank of greater than 12 steps, we entered into the surveillance actions described in item e, below. However, there were some rods in groups A and B that were indicating very near a 12 step misalignment, and as the indication drifted above and below 12 steps, the operators were constantly barraged with this nuisance alarm. Since the rod positions had been verified (as per item 3, below) and their position was unchanged since verification, there was no safety concern involved.

To eliminate the nuisance alarms, our staffs have reached an agreement on the alarm setpoints which is defined in item f, below. That agreement came through a phone call today.

Mr. S. A. Varga August 3, 1981 Page 2

The interim actions we have agreed to take are as follows:

- a. When reactor power is greater than 85% and Control Bank D is withdrawn more than 190 steps, the indicated positions of the individual rods of Control Bank D will be maintained within 24 steps of their associated group demand step counter.
- b. When reactor power is greater than 85% and Control Bank D is withdrawn less than or equal to 190 steps, the indicated positions of individual rods of Control Bank D will be maintained within 12 steps of their associated group demand step counter.
- c. When reactor power is greater than 85%, the indicated positions of the remaining rods (namely shutdown Banks A & B, and Control Banks A, B, and C), shall be maintained within 12 steps of their associated group demand step counter.
- d. When reactor power is equal to or less than 85%, the indicated positions of all rods will be maintained within 24 steps of their associated group demand step counters.
- If the limits described in items a, b, c or d cannot be maintained, the e. position of the apparently misaligned rod will be determined to the extent possible utilizing the nearest available in-core instrumentation within two hours. For Control Bank D, rod position will be verified by in-core instrumentation every shift thereafter. For Control Bank C, when inserted, rod position will be verified by in-core instrumentation every shift thereafter. For fully withdrawn Banks, other than Bank D, rod position will be verified similarly at periods of less than or equal to seven days provided the rods are not intentionally moved. If the rod position, as determined by in-core instrumentation differs from the step demand counter by more than 18 steps, the rod is considered to be misaligned and Technical Specification 3.10.e must be applied. (This requirement assumes a 6-step inaccuracy in the rod position determination using in-core instrumentation and is intended to maintain the overall actual misalignment limit of 24 steps, i.e., 15 inches).
- f. The computer alarms for deviation between control rod position indication and the group step counters shall be set at ≤ 12 steps and ≤ 24 steps, such that the alarm will reflash if another rod reaches the 12 step limit or if the first rod reaches the 24 step limit. When the surveillance actions of item 3, above, are in effect due to a 12 step limit, the 12 step alarm setpoint may be readjusted to ≤ 18 steps to avoid spurious alarms.

Very truly yours,

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

 snf

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