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 GIESLER,C.W. Wisconsin Public Service Corp.
 RECIP.NAME RECIPIENT AFFILIATION
 EISENHUT,D.G. Division of Licensing

SUBJECT: Forwards response to Generic Ltr 82-10 re post-TMI requirements.

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

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WISCONSIN PUBLIC SERVICE CORPORATION

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

June 7, 1982

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

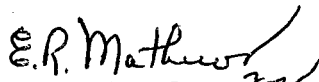
Dear Mr. Eisenhut:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
NUREG-0737: Update Information

Reference: 1) Letter to "All Licensees" from D. G. Eisenhut (Generic Letter 82-10)
dated May 5, 1982.

By enclosure to this letter we are providing you with a general update of our
commitments as requested in the above referenced letter.

Very truly yours,



C. W. Giesler
Vice President - Nuclear Power

js

Enc.

cc - Mr. Robert Nelson, US NRC

Subscribed and Sworn to
Before Me This 7th Day
of June, 1982



Notary Public, State of Wisconsin

My Commission Expires:
March 24, 1985

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Attachment to the letter from E. R. Mathews
to D. G. Eisenhut

Dated June 7, 1982

Update Information
On NUREG-0737 Items

References

- 1) Letter from E. R. Mathews (WPSC) to D. G. Eisenhut (NRC) dated September 10, 1981.
- 2) Letter from E. R. Mathews (WPSC) to S. A. Varga (NRC) dated September 10, 1981.
- 3) Letter from S. A. Varga (NRC) to E. R. Mathews (WPSC) dated November 19, 1981.
- 4) Letter from R. Licciardo (NRC) to Kewaunee Nuclear Power Plant dated December 22, 1981.
- 5) Letter from E. R. Mathews (WPSC) to D. G. Eisenhut (NRC) dated March 11, 1981.
- 6) Letter from E. R. Mathews (WPSC) to D. G. Eisenhut (NRC) dated April 1, 1982.
- 7) Letter from E. R. Mathews (WPSC) to D. G. Eisenhut (NRC) dated April 23, 1982.
- 8) Letter from E. R. Mathews (WPSC) to D. G. Eisenhut (NRC) dated May 7, 1982.

DRAFT

Item I.A.1.3.1

Limit Overtime

Reference

Reference 3 advised us of your review of our Administrative Control Directive (ACD) No. 2.15 (Overtime Policy) and conclusion that we have "met the requirements of clarification Item No. I.A.1.3.1 of NUREG-0737 in an acceptable manner."

We consider this item closed.

Item I.A.1.3.2

Minimum Shift Crew

Reference 4 provides a summary of the meeting held November 23, 1981, with the NRC to discuss our proposal for providing an additional licensed Senior Reactor Operator (SRO) on each shift. We have committed to providing an additional SRO on shift by January 2, 1984. This date is based on the time required to train and license Reactor Operators (RO's) and allow them to replace the existing RO's on shift so they can in turn attend SRO training courses.

Item I.C.1

Revise Emergency Procedures

In reference 7 we advised you that we are continuing to follow the efforts of the Westinghouse Owners' Group and your staff in developing the generic Accident and Transient Procedures. We plan on implementing these procedures in a timely manner upon completion of your review.

Item II.D.1

Relief and Safety Valve Evaluation

In reference 6 we advised that we are still following the EPRI Safety and Relief Valve test program. On May 17, 1982 EPRI advised us that a package of information is scheduled for submittal to you on June 1, 1982. We will review this report and address it in our plant specific analysis which is scheduled for submittal on July 1, 1982. On May 28, 1982, we notified you by telegram that preliminary results of our plant specific analysis indicate that the piping upstream at the safety valves may be subject to stresses which exceed allowable limits due to forces caused by the cold loop seal water acting on the downstream piping upon actuation of the safety valve. We are working with our consultant on this and will report on our progress in the July 1, 1982 submittal. (Reference LER 82-13)

Block Valve Test Program

In reference 5 we advised you that the block valves are control grade components and the failure of a PORV or its block valve to close does not prevent the fulfillment of the design objective which is depressurization of the RCS. In view of this we support EPRI's position as stated by R. C. Youngdahl:

The PWR utilities and EPRI believe that the proper operation of the TMI-2 and Crystal River-3 block valves and other operational experience plus knowledge of the Marshall block valve tests supports a less hurried and more rational approach to block valve testing.

Item II.K.3.30 and II.K.3.31

SB LOCA Analysis

In reference 7 this item was identified as "adequately addressed at present." We are currently following the effort of the Westinghouse Owners Group on this topic. We feel that it is premature to commit to a plant specific analysis until it is proven necessary.

Item III A.1.2

Staffing Levels for Emergency Situations

In reference 1, we committed to meeting the minimum staffing requirements in Table B-1 of NUREG-0654 with the following interpretations and exceptions to the implementation dates.

ON-SHIFT

- 1 Shift Supervisor (SRO) - currently on-shift
- 1 Assistant Shift Supervisor (SRO) - will be provided on-shift by Jan. 2, 1984. In the interim will be augmented via pager system and available within 30 minutes.
- 2 Control Room Operators (RO) - currently on-shift
- 2 Auxiliary/Equipment Operators - currently on-shift
- 1 Communicator - will be provided by Jan. 2, 1983. In the interim will be augmented via pager system and available within 30 minutes.
- 1 Radiation Technologist - currently on-shift
- 1 Chemistry Technologist - will be provided by Jan. 2, 1983. In the interim will be augmented via pager system and available within 30 minutes.
- 1 Shift Technical Advisor - currently available to the Control Room within 10 minutes whenever the plant is above the cold shutdown condition.

- 1 ** Emergency Direction - responsibility of the SS with the STA as backup.
 - 2 ** Repair and Corrective Actions - minor mechanical and electrical repairs such as packing adjustments and breaker resetting can be performed by on-shift operators.
 - 2 ** Protection Actions (In-Plant) - there is a trained 5-man Fire Brigade on-shift and all plant personnel receive annual radiation protection training including use of radiation detection instruments.
 - 2 ** Rescue Operations and First Aid - all plant personnel receive first aid training.
- ** - These personnel will be cross-trained to provide support in more than one functional area.

Our position on this item has not changed.

Item III.A.1.2

Upgrade Emergency Support Facilities

With the exception of the EOF, we have completed our emergency response facilities. Based on our experience obtained during our emergency preparedness exercise performed last February, we have decided to relocate the EOF to our division office building in Two Rivers. This move is scheduled to be complete by October 1, 1982.

Item III.A.2.2

Meteorological Data

Reference 8 provided you with the instrument specifications for the new meteorological system planned for installation later this year at Kewaunee. The two analog readout instrument racks will be located in the work area of the Technical Support Center (TSC) in the same area as the data acquisition system installed to meet the original short term NUREG 0578 requirements. This location is preferred over a control room location for the following reasons:

- 1) If a planned (non-emergency) release is dependent upon current meteorological conditions, operating personnel would be available to obtain the necessary data in the TSC, located "less than two minutes from the control room."
- 2) In an emergency, key plant technical staff members report to the TSC in accordance with Emergency Plan Implementing Procedures. While the control room operators are concerned with the in-plant mitigation of the emergency, the TSC staff will be either assessing the off-site consequences of a release (based upon source term and meteorological information) or relaying that information to the Environmental Protection Director located in the EOF.
- 3) Meteorological data will be available in the control room, TSC, and EOF upon the completion of installation of the new plant computer system, scheduled for October 1983. At that time, the analog racks in the TSC will serve only as backups.

At the present time, installation of the on-site primary and back-up towers is scheduled to be complete by August 1. This date is contingent upon completion of installation design. A 10 meter supplemental tower, if necessary to determine the effects of the lake breeze phenomena, will be located and integrated into the system on a different schedule not yet determined.

The supplemental tower is being manufactured concurrent with the primary and backup systems; however, no installation design is in progress until the completion of the lake breeze study, at which time an optimum location could be determined (if necessary).

III.D.3.4

Control Room Habitability

In reference 2, we advised you that the system modifications, as identified in our report, are in the design stage. It is expected that the physical modifications will be completed by June of 1983.

Our position has not changed on this item.