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VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Forwards Revision 2 to "Reactor Test Program, Kewaunee Nuclear Power Plant."

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## WISCONSIN PUBLIC SERVICE CORPORATION



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

July 22, 1982

Mr. Steven A. Varga, Chief Operating Reactors, Branch #1 Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Varga:

Docket 50-305 Operating License DPR-43 Kewaunee Nuclear Power Plant Reactor Test Program

Reference: 1) Letter from E. R. Mathews (WPSC) to S. A. Varga (NRC) dated June 4, 1981 on the subject of "Reactor Test Program".

The 'Reactor Test Program, Kewaunee Nuclear Power Plant' was submitted on May 22, 1979 and was revised on April 14, 1980. This document has been reviewed, and based on two years of experience we have found the following changes necessary:

-Section 5 has been added. This section explicitly states that changes may be made to this program under the provision of 10CFR50.59 and reflect our concerns stated in our letter of June 4, 1981 (reference 1). We assure you that the safety of the plant is of primary concern and that changes to the Reactor Test Program will not be made without a proper safety evaluation. However, it is necessary we retain the flexibility as allowed by regulations to make changes in the Reactor Test Program as conditions warrant.

-The Table of Contents has been revised to include Section 5.

-The last paragraph of the introduction has been changed to read: "This report offers a brief description of the Kewaunee Plant test program and is not intended to provide a detailed specification of future test programs for use in a compliance inspection." This change clarifies the original intent of this paragraph.

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-The review criteria for measured normalized reaction rate difference in symmetric thimbles specified by item 1, page 7, and item i, page 10A have been changed from 5% to 10% and from 3% to 6%, respectively. Experience has shown that these differences are routinely encountered, and our evaluations have found that they are not a safety concern. The measured normalized reaction rate difference in symmetric thimbles is a secondary parameter used to make a qualitative judgment of core performance. It is proper that the review criteria represent a value out of the norm to serve as a flag that additional scrutiny of core design and primary parameters be undertaken.

-The review criterion for calculated quadrant tilt (page 7, item 3) has been changed from 5% to 4%. This is consistent with the Westinghouse Position Statement on Core Tilt transmitted to WPS on April 2, 1981. The position has the concurrence of the NRC Core Performance Branch Staff.

-The reference section has been updated to include the above referenced Westinghouse Position Statement.

Enclosed you will find 40 copies of the revised Kewaunee Reactor Test Program.

Very truly yours,

Carl W. Giesler

Vice President - Nuclear Power

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cc - Mr. Robert Nelson, NRC Sr Resident Inspector

Enc.