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SUBJECT: Comments on NRC proposed generic requirements for steam generators.Upposed requirements,favoring mgt control program currently in effect.Program should be at volition of util mgt & notice requirements.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

October 4, 1982

Mr. Thomas A. Ippolito, Chief
Operating Reactors Assessment Branch
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Ippolito:

0070108 8210

Docket 50-305 Operating License DPR-43 Kewaunee Nuclear Plant NRC Proposed Steam Generator Generic Requirements

Attached please find our comments regarding the NRC proposed generic requirements for steam generators. Since we are not a member of the Steam Generator Owners Group (SGOG), our comments were not formally solicited when the proposed requirements were presented July 29, 1982, at the joint NRC-SGOG meeting. Nonetheless, we consider this issue too important for a segment of the industry, the SGOG, to provide the only comments on requirements by which the entire industry may eventually operate. The approach the NRC has taken to institute these requirements excluded WPSC from the comment cycle, on an issue which could affect us significantly.

The NRC failed to address utilities through an appropriate means such as a generic letter. This vehicle would insure that all utilities have an equal opportunity to respond to the proposed requirements, not just those utilities represented by the SGOG. Although we were forwarded the NRC's proposed requirements by the SGOG and our Project Manager, we feel this is an inappropriate way of obtaining the information. The NRC should have solicited comments from WPSC directly, especially in light of our operating experience.

WPSC has successfully operated the Kewaunee Nuclear Power Plant for more than eight years without a steam generator tube leakage problem. Given this outstanding performance record, WPSC should have been a major participant in helping the NRC to ascertain an effective program to maintain steam generators. Mr. Thomas Ippolito October 4, 1982 Page 2

Our management is firmly committed to a program which minimizes steam generator problems. We are convinced that a firm management commitment to establish a control program is essential to maintain steam generators. This program should be the volition of the utility's management however, not a requirement of the NRC. The exemplary performance of the Kewaunee Nuclear Plant steam generators supports this conviction that a management control program can be effective.

We are concerned that some of these proposed requirements, if put into effect, are based on assumptions which are outside the licensing basis of some plants. Furthermore, we sense the NRC is becoming increasingly involved in the dayto-day operations of nuclear plants. While we applaud the efforts being made to assure steam generator problems are reduced, we question the appropriateness of NRC involvement in the form of requirements.

A steam generator tube rupture (SGTR) accident has been analyzed in the FSAR (Section 14.2.4).

"It is concluded that the complete failure of a steam generator tube preceded by a long-term leak history prior to its failure would present no undue hazard to public health and safety." (FSAR at 14.2-28)

Since it has been shown that there is no undue hazard to the public's health and safety, we suggest the staff's limited time and resources could be better used addressing other matters. As always, we welcome the opportunity to discuss this matter with you further and request that all licensees be included in future matters which may affect them.

Very truly yours,

CR Juma for

C. W. Giesler Vice President - Nuclear Power

smv

Attach.

Below are the WPSC Responses to the

NRC Proposed Generic Requirements for Steam Generators

(Presented at the July 29, 1982, joint NRC-SGOG meeting. The numbers correspond to those in the NRC proposal.)

Item II.1 Prevention and Detection of Loose Parts and Foreign Objects

- (1) Although peripheral inspection is a valid idea, the capability does not exist at this time to perform such an inspection remotely. We question the merit of an inspection which may increase personnel exposure or introduce additional loose parts from remote equipment. We are not convinced that this is a viable requirement.
- (2) This requirement would be difficult to implement due to the substantial number of parts on remote inspection and cleaning equipment. It would entail inventorying each nut, bolt, and spring on every piece of equipment, which would involve long and costly procedures.
- (3) Loose parts monitors have a low confidence level as illustrated by the experience at Ginna and Prairie Island. We do not think these systems are currently reliable enough to justify their required purchase and installation.

Item II.2 Stabilization and Monitoring of Degraded Tubes

There is no acceptable way to monitor continued degradation of explosively plugged tubes. Mechanical plugs have been tested but are currently unreliable and limited leakage plugs are not advisable since they can contaminate the secondary side, increasing personnel exposures and radwaste volumes.

Item II.3 Inservice Inspection Program

We do extended the proposed alongs for the TOT Experies. When extended govies are sufficient to down the health and they of the publics for addictor, given a strong commitment by management to water quality control, the current ISI requirements do not need to be expanded to insure adequate surveillance of steam generator conditions.

There is no reason why the completed inspection report should go to the NRC prior to startup. Any tube degradation and plugging will be reported through the incident report process as an abnormal degradation of the RC pressure boundary. Furthermore, the final inspection report is usually not available for some time after startup. This is an unnecessary duplication of reporting requirements.

Item II.4 Improved Eddy Current Techniques

We suggest that comments should be solicited from the recognized experts in the field of multifrequency eddy current techniques.

Item II.5 Primary to Secondary Leakage Limit

The Kewaunee Plant is already limited to these values by our present Technical Specifications (TS 3.1.d.1 & 2). There is no need for additional requirements.

Item II.7 Secondary Water Chemistry Program

This item does not warrant a licensing condition. A firm management commitment such as that at WPSC can insure a successful control program as exemplified by the performance of our steam generators. It is prudent management to have an operational chemistry program which management supports to protect the company's investment.

Item II.8 Condenser Inservice Inspection Program

As with Item II.7 above, this is inappropriate as a licensing condition. A firm management commitment to minimize steam generator problems suggests the need to maintain a water quality control program which includes a condenser ISI program. Based on the costs associated with a forced outage to repair a steam generator, management should consider implementing this program on their own. No NRC requirement is necessary; Kewaunee already has a condenser ISI program in place.

Item II.9 Upper Inspection Ports

This is a costly requirement which is not warranted. Without additional handhole sleeves, bypass velocities could induce vibration problems. Hence, requiring upper inspection ports would require both ports and handhole shows a low new matrix alog are measured as y if items his? and lise are in effect as part of a total accessed control program.

Item III Plant Systems Response

No comment.

Item V.1.4 Standard Technical Specification Limit for Coolant Iodine Activity

The set of assumptions the NRC used are outside the bounds of an analyzed accident envelope (FSAR Sec. 14.2.4). We do not think this requirement is justified. Rather, a program designed to maintain fuel clad integrity will attack the problem at its source.