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SUBJECT: Comments on potential steam generator generic requirements. Insufficient technical justification to warrant rulemaking re multiple tube rupture events.Research into probabilities & consequences of event appropriate.

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WISCONSIN PUBLIC SERVICE CORPORATION



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

January 7, 1983

Director, Office of Nuclear Reactor Regulation Attention: Mr. D. G. Eisenhut, Director Division of Licensing Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Gentlemen:

Comments on Potential Steam Generator Generic Requirements

The Value-Impact Analysis prepared by Scientific Applications Incorporated (SAI) quantitatively confirms what one would reason intuitively. That is, forced outages resulting from steam generator tube degradation or rupture could best be avoided by implementing a plan consisting of:

- 1. Secondary water chemistry program combined with condenser Inservice Inspection (ISI)
- 2. Secondary side ISI and Quality Assurance (QA) for loose parts
- 3. General ISI
- 4. Improved eddy current testing (ECT)

It is reasonable that the above plan affords the licensee with the most cost effective steam generator tube integrity program. Numbers (1) and (2) above provide the only true 'preventative' measures in that they keep undesirable materials (be they air, cooling water, or parts) out of the steam generators. Numbers (3) and (4) above are essential because they provide a check on the effectiveness of the secondary water chemistry program, condenser ISI, secondary side ISI, and QA for loose parts.

It is also reasonable that the proposed hardware fixes;

- 1. Upper inspection ports (UIP)
- Loose parts monitoring system (LPMS)
- 3. Implementation of tube stabilization and monitoring study
- 4. Implementation of reactor coolant system pressure control study
- 5. Safety injection (SI) signal reset

6. Containment isolation and reset

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would be ineffective in preventing steam generator tube degradation and should not be required of all PWR licensees. The reason these proposed hardware fixes are of little value is that they are either 'after the fact' or mitigative in nature. Looking at them item by item:

- 1. UIP's only confirm what can be shown with improved ECT and secondary side ISI. UIP's do not prevent tube degradation.
- 2. A QA program for loose parts would be more effective in that it is a preventative measure.
- 3. Tube stabilization and monitoring would be required only after gross degradation is detected. However, tube stabilization does not prevent tube degradation.
- 4. In the four (4) tube rupture events that have occurred the RCS pressure was controllable. This does not prevent tube degradation.
- 5. & 6. Both the safety injection (SI) signal reset and the containment isolation (CI) reset issues have been studied extensively under the TMI action plan.¹ The referenced studies provide the technical background necessary to fully understand this subject and should be considered prior to any rulemaking. In regards to the Kewaunee Plant, on page IV.11-1 of the Value Impact Analyses prepared by SAI under contract NRC-03-82-131 it was stated that, "The SI pump suction is designed to shift automatically on low BAT ² level from the BAT to the RWST ³ only if the SI signal has not been reset... This particular SI system configuration is believed to be found only at 2-loop Westinghouse plants, e.g. Kewaunee." However, at Kewaunee, the suction of the SI pumps will switch from the BAT to the RWST on low BAT level regardless of the SI signal status.

It is our understanding that the intent of the proposed steam generator generic requirements is to prevent steam generator tube degradation. Items (1) through (6) above, proposed hardware fixes, have been shown not to prevent tube degradation; therefore, they are not in the scope of the steam generator generic requirements.

It is in the best interest of the licensee to prevent SGTR's and maintain steam generator tubes in the best possible condition. Previous analysis has

INUREG 0737, Item II.E.4.2 CI Dependability Bulletin 80-06 Reset of Engineered Safety Features

²Boric Acid Tank

³Refueling Water Storage Tank

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shown that SGTR's do not pose unreasonable risk to the public; consequently, a program designed to maintain steam generator tube integrity would be more appropriate than technical specifications (although radioiodine limits in the technical specifications are reasonable due to 10CFR no limits).

Multiple Tube Rupture (MTR) Events

We feel there is insufficient technical justification to warrant rulemaking in regards to MTR's; therefore, research into the probabilities and consequences of such an event would be appropriate prior to any rulemaking. The NRC should seek comment on those studies comprising the bases for regulations stemming from MTR's.

Very truly yours,

CR Luma for

C. W. Giesler Vice President - Nuclear Power

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cc - Mr. Robert Nelson, US NRC Mr. S. A. Varga, US NRC