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 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305
 AUTH. NAME: GIESLER, C.W. AUTHOR AFFILIATION: Wisconsin Public Service Corp.
 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Advises that SAR re Item I.D.2, "Safety Parameter Display Sys," per Suppl 1 to NUREG-0737 (Generic Ltr 82-33) will be submitted by 830901. Sys not scheduled for implementation until end of Spring 1984 refueling outage.

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 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737 (Generic Ltr 82-33)

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WISCONSIN PUBLIC SERVICE CORPORATION


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

August 4, 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:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
Clarification of Supplement 1 to NUREG-0737 Implementation Plan

References: 1) Generic Letter 82-33, Supplement 1 to NUREG-0737
 2) Letter from C. W. Giesler to D. G. Eisenhut dated
 April 15, 1983

Reference 1 provided clarification on several long-term TMI Action Plan items and provided licensees with additional guidance to meet those requirements. Reference 2 provided our integrated plan and provided implementation dates for each of the items. Per the request of our NRC Project Manager, this letter is being submitted to clarify some items in our April 15, 1983 letter.

Reference 1 required us to submit a report describing our method of implementing Reg. Guide 1.97 (Rev. 2) and our supporting technical justification for any proposed alternatives. Our proposed method of implementation was submitted in reference 2 under the title "Accident Monitoring Instrumentation." As indicated in that submittal the program will consist of the following.

- 1) WPSC will develop plant specific Emergency Operating Procedures (EOP's) based upon the Westinghouse generic Emergency Response Guidelines (ERG).
- 2) The generic System Review and Task Analysis (SRTA) developed by Westinghouse in conjunction with the ERG project will be made plant specific. This task will be performed as part of the Detailed Control Room Design Review (DCRDR) program.

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- 3) The SRTA will identify the instruments necessary to implement the ERG's. Since the ERG's are a comprehensive set of procedures designed to cover multiple accident and recovery situations, the instrumentation defined as "necessary" by the SRTA will be regarded as necessary parameters in our control room.
- 4) The instrumentation identified in the SRTA will be compared with that currently available in the control room. The comparison of SRTA instrumentation and the control room inventory will be performed as part of the DCRDR.
- 5) All identified deficiencies will be categorized as Human Engineering Observations (HEOs) and will be evaluated by the DCRDR team. The DCRDR team will develop a list of recommendations for improvements which will be supported by documents produced throughout the assessment process.
- 6) The DCRDR summary report outlining proposed control room changes, including additional accident monitoring instrumentation if necessary, will be submitted to the NRC in November, 1984.

It is our intent to utilize the SRTA during the DCRDR to identify the instrumentation necessary to implement the Emergency Operating Procedures. The DCRDR program will evaluate any HEOs that might be present in our control room. The results of the DCRDR will include documentation that either justifies the HEO or provides recommendations for improvement that will be forwarded to management for resolution.

Since the SRTA and the control room inventory are part of the DCRDR, instrumentation deficiencies will be identified and recommendations for corrective actions will be made as part of that program. The DCRDR summary report will provide documented evidence that either the instrumentation in the control room is sufficient to handle an emergency or improvements are necessary. In either case, the DCRDR summary report, to be submitted in November, 1984, will outline all proposed control room changes necessitated by the review.

In response to item I.D.2 Safety Parameter Display System (SPDS), we committed (reference 2) to supplying a safety analysis report identifying and evaluating the plant specific departures from the generic SPDS design. According to reference 1, the analysis should be submitted to the NRC "promptly on completion of review by the licensee's offsite safety review committee." The next meeting of our offsite safety review committee is scheduled for the middle of August. The SAR submittal, originally scheduled for August 1, 1983, is an agenda item for that meeting. As discussed with our NRC Project Manager, we will submit our SAR by September 1, 1983 following committee review. We feel this extension is warranted since the Kewaunee SPDS is not scheduled for implementation until the completion of the spring 1984 refueling outage.

Mr. D. G. Eisenhut
August 4, 1983
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Very truly yours,

C. W. Giesler

C. W. Giesler *for*
Vice President - Nuclear Power

js

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