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 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Requests approval for extension in scheduler requirements of App R, per NRC 831207 ltr. Justifications for remaining two interim positions & actions for compliance prior to startup from Spring 1984 refueling outage listed.

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WISCONSIN PUBLIC SERVICE CORPORATION



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

January 25, 1984

Director of Nuclear Reactor Regulation
 Attention: Mr. S. A. Varga, Chief
 Operating Reactors Branch No. 1
 Division of Licensing
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Gentlemen:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
Appendix R Extension Request

- References: 1) Letter from S. A. Varga (USNRC) to C. W. Giesler (WPSC) dated December 7, 1983
- 2) Letter from C. W. Giesler to S. A. Varga dated December 28, 1983

This letter provides an update of the four "interim positions" as discussed in your letter of December 7, 1983 (Reference 1). In a letter dated December 28, 1983 (Reference 2) WPSC agreed to implement two of the interim positions and provided justification intended to resolve the remaining two positions. During the last month, extensive discussions among our staffs have taken place concerning the remaining two interim positions. We have proceeded swiftly but cautiously to evaluate the steps necessary to comply with the remaining two "interim positions". This letter addresses the remaining two "interim positions" and the actions we will take to comply with them prior to startup from the spring 1984 refueling outage. The information presented here confirms the information discussed among our staffs on January 17, 1984.

The remaining two "interim positions" which, if implemented at KNPP, would form an adequate interim post-fire shutdown capability justifying an extension in the schedular requirements, until 1987, of Appendix R are:

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- The licensee shall have the capability of providing instrumentation for the following parameters utilizing only on site personnel: reactor coolant system pressure, reactor coolant hot leg and cold leg temperatures, pressurizer level, steam generator pressure and level, and neutron flux. The instrumentation must be available within 30 minutes of the time of evacuation of the control room.
- A continuous fire watch should be provided in fire area TU-95, or modifications which would provide passive fire protection (such as the dedicated shutdown panel, or an automatic fire suppression system coupled with a partial fire barrier) in this area should be completed.

The first position requires the capability to provide additional instrumentation within thirty minutes of evacuation of the control room.

WPSC will provide the following instrumentation on the dedicated shutdown panel prior to startup from the spring 1984 refueling outage:

- Reactor Coolant System Pressure
- Reactor Coolant System Hot Leg and Cold Leg Temperatures
- Pressurizer Level
- Steam Generator Pressure and Level

The USNRC has agreed that adequate technical justification has been presented in our December 28, 1983 letter, to delete the neutron flux instrumentation as an "interim position" requirement. The installation of these instruments will constitute their final Appendix R modification and hence they will be independent of the control room and relay room.

The second position requires a continuous fire watch in fire area TU-95 or certain fire protection modifications. WPSC will provide the following protection prior to startup from the spring 1984 refueling outage.

First, passive fire protection, consisting of a three hour fire wall will be erected which will isolate 1A auxiliary feedwater pump from fire area TU-95, creating a new fire area, TU-95C.

Secondly, the power supply cable to the above auxiliary feedwater pump and its associated lube oil pump will be re-routed through a "dedicated" fire area (that is, through a fire area which is independent of TU-95). Furthermore, both the power supply cable and the control power cable for the associated flow control valve and isolation valve will be similarly re-routed and hence protected from a fire in fire area TU-95.

The result of these fire protection modifications will allow the plant to achieve and maintain a safe shutdown condition by assuring that an adequate heat sink is available. This will constitute the final Appendix R modification for this equipment.

Finally, the power supply cable for the 1A charging pump was re-routed around fire area TU-95 during the 1983 refueling outage in accordance with another

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Appendix R modification. Therefore, this pump will be available to supply makeup water to the reactor coolant system if a fire should occur in fire area TU-95.

In summary, we are again requesting your approval of our extension request as soon as possible. We have agreed to implement the final two "interim positions" as stated in your December 7, 1983, letter. With the implementation of these final two "interim positions" we will have agreed to provide all four of your "interim positions" in regards to fire protection requirements and as such we feel that the KNPP will have adequate interim post-fire shutdown capability justifying an extension in the schedular requirements of Appendix R. As always, we will be happy to discuss this with you at any time, either at the Kewaunee Plant or in your offices.

Sincerely yours,



C. W. Giesler
Vice President - Nuclear Power

DJM:jks

cc - Mr. Robert Nelson, US NRC