

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8811070364 DOC. DATE: 88/11/01 NOTARIZED: NO DOCKET #  
 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305  
 AUTH. NAME AUTHOR AFFILIATION  
 STEINHARDT, C.R. Wisconsin Public Service Corp.  
 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to Generic Ltr 88-11, providing results of licensee analysis of Reg Guide 1.99, Rev 2 & effect on plant.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2  
 TITLE: OR Submittal: General Distribution

## NOTES:

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL
	PD3-3 LA		1	0		PD3-3 PD		2	2
	GIITTER, J		1	1					
INTERNAL:	ACRS		6	6		ARM/DAF/LFMB		1	0
	NRR/DEST/ADS 7E		1	1		NRR/DEST/CEB 8H		1	1
	NRR/DEST/ESB 8D		1	1		NRR/DEST/MTB 9H		1	1
	NRR/DEST/RSB 8E		1	1		NRR/DOEA/TSB 11		1	1
	NRR/PMAS/ILRB12		1	1		<del>NUDACS-ABSTRACT</del>		1	1
	OGC/HDS1		1	0		REG FILE 01		1	1
	RES/DSIR/EIB		1	1					
EXTERNAL:	LPDR		1	1		NRC PDR		1	1
	NSIC		1	1					

TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL 22

M/A 4  
cc

R  
I  
D  
S  
/  
A  
D  
S  
  
R  
I  
D  
S  
/  
A  
D  
S



**WISCONSIN PUBLIC SERVICE CORPORATION**

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

November 1, 1988

10 CFR 50, Appendix G

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Response to Generic Letter 88-11

- References:
- 1) Letter from F. J. Miraglia (NRC) to All Licensees of Operating Reactors and Holders of Construction Permits dated July 12, 1988 (Generic Letter 88-11)
  - 2) Letter from C. W. Giesler (WPSC) to H. R. Denton (NRC) dated April 29, 1986
  - 3) Letter from M. B. Fairtile (NRC) to D. C. Hintz (WPSC) dated December 18, 1986

Reference 1 required all licensees to reevaluate their reactor vessel pressure-temperature limits in accordance with Revision 2 of Regulatory Guide 1.99. This letter provides the results of Wisconsin Public Service Corporation's technical analysis of Regulatory Guide 1.99, Revision 2 and its effect on the Kewaunee Nuclear Power Plant (KNPP).

The KNPP's pressure-temperature (P-T) limits were revised in 1986 using Draft Revision 2 of Regulatory Guide 1.99 dated February, 1986. The proposed limits were submitted to the NRC by reference 2 and were approved by the NRC in reference 3. However, the calculational methods presented in the final version of Revision 2 of Regulatory Guide 1.99 vary slightly from the methods presented in the draft version. Therefore, in response to reference 1, new values of adjusted reference temperatures (ART) were calculated using the final Revision 2 and were compared to the ARTs used to calculate the existing KNPP P-T limits. As discussed in the following paragraphs, this comparison revealed that the existing P-T limits are conservative compared to the limits allowed by the final version of Revision 2 of Regulatory Guide 1.99.

8811070364 881101  
PDR ADDCK 05000305  
P PNU

*Acc  
1/0*

Regulatory Guide 1.99 allows the calculation of ART by either of two methods: using data from the reactor vessel surveillance capsule program or using generic calculational methods. The existing KNPP P-T limits were obtained using the generic calculational methods described in Draft Revision 2 of Regulatory Guide 1.99.

However, since the KNPP surveillance data meets the regulatory guide's acceptance criteria, the surveillance data method was used to calculate new ART values for comparison to the ART values which had been used to obtain the existing P-T limits. This calculation used the same inputs described in reference 2 and approved in reference 3. The results of this calculation are shown in the table below:

Comparison of Adjusted Reference Temperature Values

Location in Reactor Vessel Wall	Current ART Values (°F)	ART Values Based On Final Revision 2 (°F)
1/4 Thickness	226	219
3/4 Thickness	183	173

This table shows that the current ART values are higher resulting in KNPP P-T limits more conservative than those allowed by the final version of Revision 2 of Regulatory Guide 1.99. Therefore, no subsequent actions are necessary in response to Generic Letter 88-11 and the current KNPP P-T limits will remain in effect until their expiration date of 15 effective full power years or approximately 1993.

Sincerely,



C. R. Steinhardt  
Manager - Nuclear Power

KAH/jms

cc - Mr. Robert Nelson, US NRC  
US NRC, Region III