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SUBJECT: Forwards Rev 1 to "Summary Rept on Sampling Study to Evaluate Effect of Torsional Moment on Pipe Stress...."

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May 5, 1989

U. S. Nuclear Regulatory Commission
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Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Criteria for Determining Continued Operability
Of Safety Related Piping Systems

- References:
- 1) Letter from D. Musolf (NSP) to Document Control Desk (NRC) dated September 26, 1988
 - 2) Letter from J. J. Harrison (NRC Region III) to C. E. Larson (NSP) dated October 12, 1988
 - 3) Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated January 18, 1989
 - 4) Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated March 10, 1989

This submittal provides a revision to portions of the information provided to the NRC in references 3 and 4.

In reference 4, the summary of a sampling study performed by Fluor Daniel entitled "Summary Report on Sampling Study to Evaluate the Effects of Torsional Moment on Pipe Stress Qualification" was provided as attachment 3. On April 12, 1989, Mr. J. Gavula (NRC Region III) reviewed the technical adequacy of the sampling study at Fluor Daniel's Chicago office. Following this inspection Mr. Gavula concluded that the sample study results were valid; however, he noted two minor errors in the analysis.

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May 5, 1989

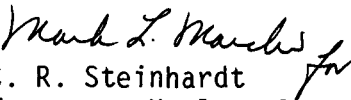
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Attachment 1 to this submittal is a revised sampling study which reflects corrections to these two errors. The first is the inclusion of record number 737 as a relevant sample. This analytical part satisfied the screening criteria of maximum OBE stress exceeding $1/2 S_h$ (material allowable stress at design temperatures). This increases the number of relevant analytical parts to 14 as noted throughout the report. The second error was a discrepancy in calculating the maximum stress ratio for record number 996. In both cases, the reanalysis did not exceed USAR allowables. Moreover, the results do not alter the overall conclusions of this sampling study. This revised report is being provided to ensure that accurate information is available for NRC review.

Attachment 2 is a revised criteria to be used for determining interim operability of KNPP safety related piping systems. A version of this criteria was submitted to the NRC as attachment 2 to reference 3. Through discussions with our Project Manager, Mr. J. Giitter, WPSC understands that deviations taken from the previously approved Northern States Power (NSP) criteria (references 1 and 2) were found to be unacceptable. Hence, attachment 2 provides an operability criteria for KNPP which is the same as Prairie Island's. We apologize for any confusion the previous submittal may have generated.

If you have questions or need additional information please contact Ms. Sherry Bernhoft of my staff.

Sincerely,


C. R. Steinhardt
Manager - Nuclear Power

SLB/jms

Attach.

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