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EVERS, K.H. Wisconsin Public Service Corp.

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SUBJECT: Requests extension of implementation date for modifying

position interlock feature on post-accident RDs.

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April 19, 1990

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 (KNPP) Updated Control Room Habitability Evaluation

- References: 1) Letter from M. B. Fairtile (NRC) to D. C. Hintz (WPSC) dated January 29, 1987
 - 2) Letter from D. C. Hintz (WPSC) to NRC dated March 31, 1987
 - 3) Letter from C. R. Steinhardt (WPSC) to Document Control Desk dated February 28, 1989
 - 4) Letter from M. J. Davis (NRC) to K. H. Evers (WPSC) dated March 7, 1990

Reference 1 transmitted a report outlining the results of KNPP's control room ventilation system survey performed by Mr. Jack Hayes of the Nuclear Regulatory Commission (NRC) and two consultants from Argonne National Laboratory. Reference 2 transmitted Wisconsin Public Service Corporation's (WPSCs) response to the results of the control room ventilation survey and made a commitment to perform additional analysis of the system and reconcile the results as appropriate.

Reference 3 submitted an Updated Control Room Habitability Evaluation which incorporated the results of system performance testing and WPSC's plans to resolve two deviations that were identified by the study. Reference 4 transmitted NRC's closeout for the TAC item on the control room habitability evaluation. The staff identified no problems with the actions and plans as described in reference 3 and made one additional recommendation for which no response from WPSC is required.

Document Control Desk April 19, 1990 Page 2

The two deviations identified in reference 3 are: the post-accident recirculation dampers 1A and 1B do not meet single failure criteria due to both dampers being interlocked with a single fresh air inlet damper, and the control room radiation monitor (R-23) which is used for automatic control room train A outside air isolation is a QA type 3 component. To correct these two items WPSC committed to perform an engineering evaluation and implement appropriate system modifications by early 1990 to make the recirculation dampers single failure proof and to provide a train A safety injection signal (QA type 1) for control room outside air isolation by the end of the 1990 refueling outage.

The purpose of this submittal is to extend the implementation date for modifying the position interlock feature on the post-accident recirculation dampers. This system modification will be completed during the spring 1991 refueling outage in lieu of early 1990 as previously committed. The justification for this extension is two fold. First, any modification to the control room should receive a human factors assessment by the Control Room Design Review Committee. The time since the deviation was identified and the engineering evaluation completed to identify the appropriate system modification has not allowed this review step to be completed. Second, since the modification work will require additional activities in control room including cutting holes in the panels, it is prudent to perform this work when the plant is in a shutdown condition.

In the interim, continued operation of the system is not a safety concern. Damper ACC-2 is normally closed and receives a closed signal post-accident. A spurious opening of ACC-2 is a very unlikely event because it is not an active component post-accident. The modification to provide a train A safety injection signal for control room outside air isolation has been completed.

Our project manager, Mr. Mike J. Davis, was notified of our desire to delay this system modification on April 9, 1990. If you have any questions or need additional information, please contact Mr. D. J. Ropson of my staff.

Sincerely,

K. H. Evers

Manager - Nuclear Power

SLB/cjt

cc - Mr. Patrick Castleman, US NRC US NRC, Region III