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AUTH.NAME AUTHOR AFFILIATION
EVERS,K.H. Wisconsin Public Service Corp.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards implementation schedule for remaining open items re Reg Guide 1.97, "Accident Monitoring Instrumentation."

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WISCONSIN PUBLIC SERVICE CORPORATION

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

August 31, 1990

10 CFR 50.49(b)(3)

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
Regulatory Guide 1.97 (Accident Monitoring Instrumentation)

References: 1) Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated October 24, 1988

2) Letter from J. G. Giitter (NRC) to C. R. Steinhardt (WPSC) dated June 26, 1989

3) Letter from K. H. Evers (WPSC) to Document Control Desk (NRC) dated September 5, 1989

Reference 1 provided the Nuclear Regulatory Commission (NRC) with a list of Regulatory Guide (RG) 1.97 variables and a summary of their current level of qualification. This information was provided at the request of the staff during a meeting between Wisconsin Public Service Corporation (WPSC) and NRC representatives on August 24, 1988. Reference 2 provided WPSC with an interim Technical Evaluation Report (TER) based on a review of the information provided in Reference 1.

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Reference 3 provided WPSC's response to the open items identified in the NRC TER. At the time Reference 3 was written, a schedule for implementation of several open items had not yet been developed. The attachment to this submittal provides the implementation schedule for the remaining open items.

Sincerely,

K. H. Evers
Manager - Nuclear Power

BJD/jac

Attach.

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

Attachment

To

RG 1.97 (Accident Monitoring Instrumentation)

Response to Remaining TER Open Items

Letter from K. H. Evers (WPSC) to Document Control Desk (NRC)

Dated

August 31, 1990

TER Open Item

1. Type A variables -- The licensee should identify plant specific Type A variables and verify that the instrumentation provided for these variables meets the Category 1 criteria (Section 3.2).

WPSC Response

A design change request has been generated to install a redundant, qualified RWST Level Channel to fulfill Kewaunee Nuclear Power Plant's (KNPP) design basis for a type A variable. This design change is planned for implementation during the 1993 refueling outage which is currently scheduled to begin in March, 1993.

TER Open Item

3. RCS cold leg water temperature -- The licensee should schedule the modifications necessary to make this instrumentation fully redundant. The licensee should rescale the instrumentation so that it will remain on scale during any postulated accident (Section 4.2.2).

WPSC Response

A design change request has been generated to rescale the instrument range to cover 50°F to 700°F and separate the power supply cables in the plant relay room in accordance with KNPP's design basis for separation. This design change is planned for implementation during the 1993 refueling outage which is currently scheduled to begin in March, 1993.

TER Open Item

4. RCS hot leg water temperature -- The licensee should schedule the modifications necessary to make this instrumentation fully redundant. The licensee should rescale the instrumentation so that it will remain on scale during any postulated accident (Section 4.2.3).

WPSC Response

A design change request has been generated to rescale the instrument range to cover 50° to 700°F, and separate the power supply cables in the plant relay room in accordance with KNPP's design basis for separation. This design change is planned for implementation during the 1993 refueling outage which is currently scheduled to begin in March, 1993.

TER Open Item

7. Containment isolation valve position -- The licensee should schedule the modifications necessary to bring this instrumentation into conformance with the Category 1 requirements. The licensee should identify the means of recording the position of the containment isolation valves (Section 4.2.6).

WPSC Response

For containment isolation valves NG-302, BT-32A, BT-32B and NG-107, the limit switches will be upgraded to address environmental qualification or seismic deficiencies. This design change is planned for implementation during the 1993 refueling outage which is currently scheduled to begin in March, 1993. WPSC feels that recording the position of the containment isolation valves is unnecessary due to alternate methods of indication presently available in the control room. For a more detailed response to this issue, reference letter from K. H. Evers (WPSC) to Document Control Desk (NRC) dated September 5, 1989.

TER Open Item

8. RHR heat exchanger outlet temperature -- The licensee should provide environmentally qualified (in accordance with 10 CFR 50.49 and Regulatory Guide 1.97) instrumentation for this variable (Section 4.2.7).

WPSC Response

A design change request has been generated to replace the installed instrument with a temperature sensor qualified in accordance with KNPP's environmental qualification (EQ) program. This design change is planned for implementation during the 1992 refueling outage which is currently scheduled to begin in March, 1992.

TER Open Item

10. Flow in high-pressure injection system -- The licensee should provide environmentally qualified (in accordance with 10 CFR 50.49 and Regulatory Guide 1.97) instrumentation for this variable (Section 4.2.9).

WPSC Response

A design change request has been generated to replace the installed instrument with a flow transmitter qualified in accordance with KNPP's EQ Program. This design change is planned for implementation during the 1992 refueling outage which is currently scheduled to begin in March, 1992.

TER Open Item

11. Flow in low-pressure injection system -- The licensee should provide environmentally qualified (in accordance with 10 CFR 50.49 and Regulatory Guide 1.97) instrumentation for this variable (Section 4.2.10).

WPSC Response

A design change request has been generated to replace the installed instrument with a flow transmitter qualified in accordance with KNPP's EQ Program. This design change is planned for implementation during the 1992 refueling outage which is currently scheduled to begin in March, 1992.

TER Open Item

13. Pressurizer heater status -- The licensee should provide Category 2 instrumentation that conclusively shows that the pressurizer heaters are operating and functioning (Section 4.2.12).

WPSC Response

A design change request has been generated to replace the installed indication with an instrument which will conclusively show that the heater group energized by safeguards power is operating and functioning. This design change is planned for implementation during the 1992 refueling outage which is currently scheduled to begin in March, 1992.

TER Open Item

14. Quench tank temperature -- The range of the instrumentation should be increased to include the saturation temperature at 100 psig (Section 4.2.13).

WPSC Response

A design change request has been generated to increase the pressurizer relief tank instrument range from 0°F to 300°F to 0°F to 350°F. This design change is planned for implementation during the 1992 refueling outage which is currently scheduled to begin in March, 1992.

TER Open Item

15. Quench tank pressure -- The range of the instrumentation should be increased to the design pressure of the tank (Section 4.2.14).

WPSC Response

A design change request has been generated to increase the pressurizer relief tank instrument range from 0 to 50 psig to 0 to 100 psig. This design change is planned for implementation during the 1992 refueling outage which is currently scheduled to begin in March, 1992.

TER Open Item

17. Containment sump water temperature -- The licensee should provide environmental qualification (in accordance with 10 CFR 50.49 and Regulatory Guide 1.97) for the RHR heat exchanger inlet temperature instrumentation (Section 4.2.16).

WPSC Reponse

A design change request has been generated to install a temperature sensor qualified in accordance with KNPP's EQ Program at the RHR heat exchanger inlet. This design change is planned for implementation during the 1992 refueling outage which is currently scheduled to begin in March, 1992.