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 EVERS, K.H. Wisconsin Public Service Corp.
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SUBJECT: Provides revised schedule for wide-range steam generator level upgrade, per Reg Guide 1.97. Upgrade of electronic portion of Category 1 variable will be completed by end of 1993 refueling outage.

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March 27, 1991

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 - Wide Range Steam Generator Level Upgrade

- References:
- 1) Letter from M. J. Davis (NRC) to K. H. Evers (WPSC) dated September 28, 1990
 - 2) Letter from K. H. Evers (WPSC) to NRC Document Control Desk dated January 14, 1991
 - 3) Letter from K. H. Evers (WPSC) to NRC Document Control Desk dated August 31, 1990
 - 4) Letter from K. H. Evers (WPSC) to NRC Document Control Desk dated March 15, 1990

Reference 1 provided the Nuclear Regulatory Commission's (NRC) safety evaluation of how the Kewaunee Nuclear Power Plant's (KNPP) post-accident monitoring instrumentation meets the guidance of Regulatory Guide 1.97. Reference 2 provided Wisconsin Public Service Corporation's (WPSC) response to several items in reference 1 including a schedule for upgrading the wide range steam generator level instrumentation for the KNPP. The purpose of this letter is to provide a revised schedule for the wide range steam generator level instrumentation upgrade.

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Reference 2 stated that WPSC planned on upgrading the wide range steam generator level instrumentation to meet KNPP's design basis for a category 1 variable when the existing steam generators are replaced. Since submitting reference 2, WPSC has continued to investigate this issue as well as discuss it with the NRC staff. Based on this continuing investigation, WPSC has determined that a staged implementation of this upgrade will most effectively resolve this issue.

Specifically, WPSC plans on upgrading the electronic portion of this variable to meet KNPP's design basis for a category 1 variable by the end of the 1993 refueling outage. This outage is scheduled for spring, 1993. The modification of this variable will be completed in parallel with the other Regulatory Guide 1.97 modifications also planned for the 1993 refueling outage as discussed in reference 3.

The upgrade of the electronic portion of this variable is intended to encompass from the transmitter to the control room indication. As such, the upgrade is not intended to include the process fluid taps, piping, and connections for this variable. Therefore, following the 1993 refueling outage, the KNPP would have two transmitters per steam generator for wide range level with common process fluid taps and piping. However, when the existing steam generators are replaced, separate taps and piping will be provided for each transmitter which would complete this upgrade.

Concerning KNPP's operation until the 1993 refueling outage, reference 4 provides detailed justification of the adequacy of the existing category 1 instrumentation that also monitors steam generator dryout. Therefore, the information provided by wide range steam generator level will be adequately provided by other variables until the completion of the modification in 1993.

If you have any further questions or need further clarification, please contact a member of my staff.

Sincerely,



K. H. Evers
Manager - Nuclear Power

KAH/jms

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

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