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SUBJECT: Informs of schedule changes re USI A-46 Implementation
 Schedule, per 880930 ltr.

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May 6, 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
Advisement of Changes in USI A-46 Implementation Schedule

- Reference: 1) Letter from C. R. Steinhardt (WPSC) to NRC Document Control Desk, dated September 30, 1988
- 2) Letter from L. C. Shao (NRC) to N. P. Smith (SQUG), dated July 29, 1988
- 3) Letter from N. P. Smith (SQUG) to Dr. J. Richardson (NRC), dated February 28, 1991

In reference 1, Wisconsin Public Service Corporation (WPSC) submitted a letter entitled "Seismic Verification Schedule in Response to Generic Letter 87-02". The letter was submitted in accordance with the Nuclear Regulatory Commission's (NRC) request (reference 2), and provided the implementation schedule for the resolution of USI A-46 at the Kewaunee Nuclear Power Plant (KNPP). As noted in reference 1, the implementation schedule was contingent upon the completion of Revision 2 of the Generic Implementation Procedure (GIP) developed by the Seismic Qualification Utility Group (SQUG), and the issuance of the final NRC Safety Evaluation Report (SER) supplement on Revision 2 of the GIP. WPSC committed in reference 1 to inform the NRC in writing of any changes in our implementation plans and schedules. In accordance with our commitment, this letter serves to inform the NRC of WPSC's schedule changes.

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May 6, 1991

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As given in reference 1, WPSC tentatively planned to commence the seismic walkdown portion of the GIP during the KNPP 1991 spring refueling outage. It was anticipated that the walkdown would be completed by the end of the 1992 spring refueling outage. This schedule was based on the assumptions listed above, and in particular, the assumption that the final NRC SER supplement would be issued by June, 1989, with no open items. As of February 28, 1991, SQUG and the NRC were in the final stages of resolving issues pertaining to Revision 2 of the GIP (reference 3).

As a result, the WPSC implementation and planning schedule for the resolution of USI A-46 is no longer appropriate or relevant based on the revised completion dates for Revision 2 of the GIP and the final NRC SER supplement. In addition, as stated in reference 1, WPSC is considering the possible integration of the resolution of USI A-46 with the resolution of other seismic issues, including the Individual Plant Examination of External Events (IPEEE). WPSC may choose to integrate the seismic IPEEE program with the requirements of Generic Letter 87-02. This has been the subject of on-going discussions between SQUG and the NRC staff.

In response to these developments, WPSC currently plans on developing an implementation schedule and responding appropriately within 120 days of receipt of the final NRC SER supplement, providing there are no open items. It is anticipated that the KNPP seismic walkdown will be completed by the end of the third annual refueling outage following the date of WPSC's response. WPSC anticipates that the NRC, in consultation with SQUG, will provide further guidance concerning submittal requirements of final implementation plans and schedules following the issuance of the final NRC SER supplement on Revision 2 of the GIP.

Sincerely,



K. H. Evers
Manager - Nuclear Power

GCR/jac

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