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 AUTH. NAME: JAMES, E.W. AUTHOR AFFILIATION: WI PUB SVC  
 RECIP. NAME: SCHWENCER, A. RECIPIENT AFFILIATION: \*\*\*OPERATING REACTORS BRANCH 1

DOCKET # 05.000305

SUBJECT: Discusses design of safety actuation circuits incorporating manual override feature; rejects contention that situation described in NRC ltr of 781128 could occur at subj unit.

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	19 PLANT SYS BR	1	1	20 EEB	1	1
	21 EFLT TRT SYS	1	1	22 BRINKMAN	1	1
	<i>C. Grimes</i>			<i>M. M. MLYNIAK</i>		
EXTERNAL:	03 LPDR	1		04 NSIC	1	1
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WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

January 3, 1979

REGULATORY DOCKET FILE COPY

Mr. A. Schwencer, Chief  
Operating Reactors Branch #1  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Gentlemen:

Docket No. 50-305  
Operating License DPR-43  
Letter to Mr. E. W. James from A. Schwencer dated November 28, 1978  
Containment Purging During Normal Plant Operation

The design of safety actuation circuits which incorporate a manual override feature have been reviewed for the Kewaunee Nuclear Power Plant. We have determined that the situation described in the referenced letter that occurred at Millstone Unit No. 2 cannot occur at Kewaunee. A similar situation but not identical to the incident that occurred at Salem is possible at Kewaunee. The logic is described below.

Either an SI signal or a containment particulate and gas monitor high radiation alarm (R11 and R12) will cause train B of Containment Ventilation isolation. Either an SI signal or a Containment Ventilation monitor high radiation alarm (R21) will cause train A of Containment Ventilation isolation. Train A controls a damper and a 36" Pratt butterfly isolation valve on both the purge supply and exhaust lines. Train B controls the same dampers and separate 36" Pratt butterfly isolation valves on the supply and exhaust lines. Train A and B Containment Ventilation reset buttons will override the automatic signals for that train permitting operation of those valves. The automatic isolation signals will be locked out until the initial automatic signal calling for Containment Ventilation isolation recedes below its setpoint or manual initiation of a Containment Ventilation signal is actuated.

If the reset buttons were used to override an isolation signal generated from the Containment particulate monitor (R11), an automatic SI signal would be blocked to Train B of the Containment Ventilation isolation. However, Train A would still function to isolate the purge and exhaust lines. Also, once purging would commence, the particulate monitor high radiation alarm

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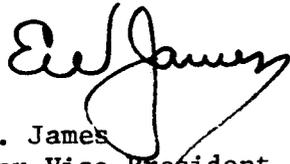
Mr. A. Schwencer  
January 3, 1979  
Page 2

would drop below its set point enabling Train B Containment Ventilation isolation again. Regardless, a notice has been issued to all operators warning them of the consequences of resetting Train A and B Containment Isolation signals and ordering them not to use the reset buttons to override a high radiation monitor alarm containment isolation signal.

Unlike the situation at the Salem plant, resetting of our particulate or gas monitor alarms within the Radiation Monitoring System will not override the safeguard actuation signal from SI. Further investigation into the design of safety actuation signal circuits has been performed. That investigation indicated that the overriding or resetting of one safety actuation signal will not affect other safety actuation signals.

It has been our practice to limit the amount of purging performed during plant operation at the Kewaunee Nuclear Power Plant and to purge only at those times when it is necessary to avoid exceeding Technical Specification Limits or to minimize occupational radiation exposure to personnel associated with planned maintenance activities within containment. We have contacted the manufacturer of the purge and exhaust isolation valves to obtain test information and/or analyses which will be necessary to evaluate our position on unlimited purging. It is important to note that the design and purchase specification for the containment ventilation require ability to operate against design pressure and specify a maximum closure time of two seconds. To date we have not received any information, however, we have been assured that information will be transmitted in the near future. We will evaluate the vendor information upon receipt and propose a program to address NRC concerns within 14 days of receipt of the vendor data. However, in the interim, we will continue to impose our current policy of restricting purging during operation to those situations where it is necessary to avoid violating Technical Specification Limits or to meet occupational exposure limits to individuals should maintenance in containment be necessary.

Very truly yours,



E. W. James  
Senior Vice President  
Power Supply & Engineering

snf