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 HINTZ, D. C. Wisconsin Public Service Corp.
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SUBJECT: Requests relief from eight valves in inservice testing program w/design prohibiting valve & switch operation.
 Relief Request IST-RR-18 deleted & replaced w/subj request.
 Rev E to "Pump & Valves Inservice Testing Plan" encl.

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NOTES: *see '87 Reports*

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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

May 29, 1987

10 CFR 50.55a(g)

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
TAC #54739
Inservice Testing Program (Rev. E)

- References: 1) Letter from C. W. Giesler (WPSC) to H. R. Denton (NRC) dated March 30, 1984.
2) Letter from D. C. Hintz (WPSC) to H. R. Denton (NRC) dated March 1, 1985.
3) Letter from D. C. Hintz (WPSC) to Mort Fairtile (NRC) dated May 17, 1985.

Wisconsin Public Service Corporation (WPSC) has recently revised the Inservice Testing (IST) program at the Kewaunee Nuclear Power Plant (KNPP). The IST program document governs the testing of ASME code Class 1, 2 and 3 pump and valves as required by 10 CFR 50.55a(g). We have determined that a certain code requirement is impractical for KNPP and we hereby provide information to support this determination as required by 10 CFR 50.55a(g)(5)(iii).

Relief request IST-RR-18 has been written to address the requirement to at least once every two years, verify that valve operation is accurately indicated by the remote position indicators. Eight (8) valves in the KNPP IST program are of a design that prohibits observation of valve and switch operation. We have provided the basis for requesting relief for these valves.

Please note that the relief request IST-RR-18 previously submitted with reference 1 has been deleted and replaced with this new relief request. The previous IST-RR-18 which dealt with the inability to test valve SW-1400 due to system design, is no longer necessary due to a recent design change which now enables exercise testing of valve SW-1400 on a quarterly basis.

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P PDR

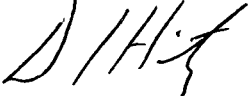
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By letters dated March 30, 1984 (reference 1), March 1, 1985 (reference 2), and May 17, 1985 (reference 3) WPSC provided the original IST program, revision A and revision B respectfully. Revisions C and D of the IST plan contained minor administrative changes and additions that did not require NRC review and approval.

We request that the Nuclear Regulatory Commission review this relief request in accordance with 10 CFR 50.55a(g)(6)(i). We have enclosed as an attachment to this letter a complete copy of revision E to the IST program. It is expected that revision E will also be used by the NRC staff members who are currently reviewing the KNPP IST program under TAC #54739.

Since this is a revision to an ongoing program review being conducted under NRC TAC #54739, no review fee is required.

Sincerely,



D. C. Hintz
Vice President - Nuclear Power

DSN/cmg

Enc.

cc - Mr. Robert Nelson, US NRC
US NRC, Region III