

WISCONSIN PUBLIC SERVICE CORPORATION



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

July 13, 1979

Mr. James G. Keppler, Regional Director
Office of Inspection & Enforcement
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

Docket 50-305
Operating License DPR-43
IE Bulletin 79-06A, Revision 1

In conversations with NRC Washington, Division of Operating Reactors Staff, certain clarifications to our June 20, 1979, response to the referenced bulletin were requested. Included below are the additional clarifications to the three items of concern as requested.

- Item 6: The Kewaunee Plant has implemented an additional Emergency Procedure to cover leaks in the pressurizer steam space. Included in this procedure are indications plant operators may use to determine that a power operated relief valve (PORV) has stuck open and directions to isolate a stuck open PORV.
- Item 11: We have previously verbally committed to the NRC Region III and hereby document our commitment to notify the NRC within one hour of the time that we have determined that the reactor is not in a controlled or expected condition of operation.

Our intent in our June 20 response was to establish a definite criteria for this one hour notification so that our operators fully comprehend their responsibilities and are not left to their discretion to try and satisfy an undefined commitment. We have, through discussions with the NRC staff and plant personnel, tried to establish what was meant by "the reactor is not in a controlled or expected condition of operation." We have serious concern that if

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statements of this nature are left to the discretion of the operator to try to satisfy during a true emergency situation, the operator's prime responsibilities and actions will be diluted. We, therefore, will proceed to establish very clear and concise guidelines for the operator to report to the NRC within one hour.

Item 12: As it is now, we do not have a specific procedure for venting H₂ or non-condensable gases from the reactor coolant system during a transient or accident. We feel that there are too many variables to try to write a meaningful procedure to cover all possible postulated situations. However, our operators are trained in the aspects of venting non-condensable gases and are particularly aware of the situation at Three Mile Island. We have referred this suggested procedure to Westinghouse through our PWR Owners Group. Westinghouse intends to study the Small Break LOCA and the potential for trapped H₂ gas in the reactor coolant system, and will develop a recommended generic procedure to handle non-condensable gas venting under the most probable conditions. At the conclusion of this endeavor we will review and incorporate the applicable recommendations in a procedure for the Kewaunee Plant.

Very truly yours,

E. R. Mathews
E. R. Mathews
Vice President
Power Supply & Engineering

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