

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
WISCONSIN PUBLIC SERVICE CORPORATION)	
WISCONSIN POWER AND LIGHT COMPANY)	Docket No. 50-305
AND)	
MADISON GAS AND ELECTRIC COMPANY)	
)	
(Kewaunee Nuclear Power Plant))	

AFFIDAVIT IN SUPPORT OF
MOTION FOR SUMMARY DISPOSITION

State of Maryland)
) ss
County of Montgomery)

The undersigned, L. P. Crocker, being first duly sworn, hereby deposes and says as follows:

1. A statement of by background and qualifications has been filed and is a part of the Docket in this matter.

2. Contention 3.18

The Technical Specifications for the Kewaunee plant (Section 3.0) set forth the limiting conditions for plant operation. Section 3.3 of the Technical Specifications prescribes the minimum conditions of operability of engineered safety feature equipment and supporting auxiliary equipment. Without

exception, all equipment in the safety injection and residual heat removal systems, the containment cooling systems, the component cooling system, and the service water system must be operable before the reactor is made critical.

During power operation or recovery from an inadvertent trip, certain active components of these systems are permitted to be out of service for short periods of time, as specified in Section 3.3, and then only after redundant equipment provided to perform the same function is tested to assure operability. The allowed out-of-service times are of short duration, allowing time for the faulty item to be inspected to determine the cause of the malfunction and to make minor repairs if necessary. Major problems probably could not be taken care of within the outage time allowed and the plant would have to be shut down. For example, a leaking valve could be inspected to determine the cause of the leak. If the leak were found to be along the valve stem, it is probable that the packing could be replaced and the valve returned to service within the out-of-service time prescribed for that system. On the other hand, if the leak were found to be due to a flaw in the valve body or a crack in a weld, the plant would have to be shut down to allow repairs to be made. Similarly, a faulty relay on a motor operator could be found, inspected, and replaced or cleaned as necessary within the outage time allowed, but a burned bearing probably

would require the plant to be shut down so that the motor could be repaired or replaced. Normal maintenance of this equipment is performed during refueling shutdown periods. In general, the limiting out-of-service times are based upon allowing sufficient time to examine the faulty component and to effect minor repairs within the capability of the personnel and repair parts on hand. At the same time, before any work is done on such a component, its companion, redundant component must be tested to assure that it is operable. Thus, even with a faulted component, there is a high degree of assurance that the potentially required safety feature function would be performed if required.

The out-of-service times allowed for Kewaunee are in accordance with what has been standard practice on other plants licensed by the AEC. The out-of-service time permitted provides limited flexibility to the operator to enhance the reliability of the plant without degrading the safety. All that is affected is the ability to withstand an additional failure of the redundant component and the operability of this redundant component is proven by test.

As stated in the FSAR, pages 7.2-9b and 7.2-9c, all of the engineered safety feature pumps and fans and the supporting pumps of the charging system, the component cooling system, and the service water system are visually annunciated on the main control board to alert the operator when

any of these components are out of service. In addition, a status panel in the control room provides a visual indication of the status of the engineered safety features on a system basis.

With these alarms and status indications to alert the operator, and with the requirement for testing to assure operability of redundant systems in the event of a malfunction, I have concluded that limited operation of the plant as allowed by the technical specifications will not affect safe operation.



L. P. Crocker

Subscribed to and sworn before
me this 5th day of February, 1973

Alvin H. Hickey

My Commission expires 7/1/70