

WISCONSIN PUBLIC SERVICE CORPORATION



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

MAY 23 1980

April 16, 1980

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention Mr. A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

Gentlemen:

Docket 50-305
Operating License DPR-43
Proposed Technical Specification Amendment No. 40a
Fire Protection

Enclosed please find forty (40) copies of proposed Amendment Number 40a to the Kewaunee Nuclear Plant Technical Specifications. This proposed amendment includes proposed Amendment 40 in its entirety and, therefore, supersedes proposed Amendment 40. Proposed Amendment 40 was submitted to the staff by letter from Mr. E. R. Mathews (WPSC) on October 19, 1979.

Proposed Amendment 40a addresses, as additions to the Technical Specifications, the appropriate requirements related to fire protection systems previously discussed in the NRC staff evaluation accompanying Amendment 23, adds a requirement for a five man fire response team, corrects several wording inconsistencies which were in the previous specification, and deletes from the license the condition requiring the fire protection modifications. In addition to the aforementioned items, the hose stations located in the auxiliary building are included in Table TS 3.15-2.

The fire hose stations in the auxiliary building should be included in the Technical Specifications because the Kewaunee Plant Fire Protection Analysis, submitted to the NRC on May 2, 1977, indicates that these stations are effective tools which assure the ability to perform a safe fire-related shutdown. With the inclusion of these hose stations in the Technical Specifications, all of the Fire Protection systems which we assumed operable in our evaluation of a safe fire-related shutdown ability will be addressed in the Technical Specifications.

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The staff has requested that the Reactor Coolant Pump fire protection system also be included in the Technical Specifications. This is unwarranted. As noted in the Introduction to the Kewaunee Plant Fire Protection Analysis, some systems were installed for other aspects of safety in addition to nuclear safety. The RCP fire protection system, having been installed for economic considerations, is an example of this. The Kewaunee Plant Fire Protection Analysis concluded that the RCP fire protection system is not required to perform a safe, fire-related shutdown. We do not concur that limiting conditions for operation are appropriate for the Reactor Coolant Pump Fire Protection System addressed in the Technical Specifications.

We had committed to implement various modifications to the Kewaunee Plant to enhance the fire protection system performance. During the final stages of initial resolution of fire protection review Amendment 23 to the Kewaunee Plant Operating License was issued. Included in that amendment was an additional paragraph, 2.c.3, as a condition of License. That paragraph addressed a list of planned or completed modifications to the Kewaunee Plant. Those modifications have been completed. Each specific component of the fire protection system which is assumed effective in assurance of safety by the Fire Protection Program Analysis submitted on May 2, 1977, has either been incorporated into the Technical Specifications previously or is included in the attached proposed amendment. The reference to the modifications should be deleted from the License conditions as it is no longer of practical significance. We, therefore, hereby request that paragraph 2.c.3 of the Kewaunee Plant Operating License, DPR-43, be deleted.

This proposed amendment is exempt from an application fee because this application does not constitute a new or additional review by the NRC staff. The Technical Specification changes submitted herein constitute previously reviewed material which was initiated prior to the March 23, 1978, implementation of 10 CFR 170.

Very truly yours,

E. R. Mathews

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

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Attach.

Subscribed and Sworn to
Before Me This 16th Day
of April, 1980

Conrad C. Butke
Notary Public, State of Wisconsin

My Commission Expires
September 25, 1982

KEWAUNEE NUCLEAR POWER PLANT
INSPECTIONS PERTAINING TO FIRE PROTECTION

REVIEWED

(DOCKET NO. 50 - 305)

REPORT

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