

WISCONSIN PUBLIC SERVICE CORPORATION



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

February 26, 1982

Mr. R. F. Heishman, Chief
Reactor Operations and Nuclear Support Branch
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Heishman:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Surveillance of Fire Doors

Reference: IE Inspection Report No. 50-305/80-24 dated December 30, 1980

This letter is to inform you of our change in position, in response to item 7.D, Plant Fire Door No. 45, in the referenced I.E. Inspection Report.

During the Fire Protection Audit, the US NRC Inspector examined many fire doors throughout the plant. Fire Door No. 45 between the two battery rooms was found to be open due to a broken latch and not electrically supervised. This was not in accordance with the US NRC position contained in Standard Review Plan 9.5-1, Appendix A, Part D.1.(j) which reads as follows:

D. General Guidelines for Plant Protection

1. Building Design

- (j) ... separate fire areas should have minimum fire rating of three hours... Door openings should be protected with equivalent rated doors, frames and hardware... should be closed and locked or alarmed with alarm and annunciation in the control room...

At the exit interview we committed to fix the latch and supervise the door.

The inspection report cites the Standard Review Plan, Appendix A, describing electrical supervision as a means of providing control for the door. Since the time of the inspection and our subsequent commitment, Appendix A to Standard

Mr. R. F. Heishman
February 26, 1982
Page 2

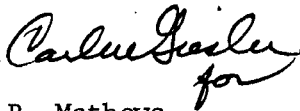
Review Plan 9.5-1 has been deleted and a revision has been incorporated into Branch Technical Position CMEB 9.5-1. This modified version describes several acceptable alternative surveillance methods that will provide equivalent protection.

Therefore, to fulfill our commitment noted in I.E. Inspection Report 80-24, one of the following measures will be taken. Fire Door No. 45 will either be locked closed and inspected weekly to verify that it is in the closed position or; it will be kept closed and inspected daily to verify that it is in the closed position. These methods will meet criteria 9.5.1(5)b and 9.5.1(5)d which state:

- (b) Fire doors should be locked closed and inspected weekly to verify that the doors are in the closed position;
- (d) Fire doors should be kept closed and inspected daily to verify that they are in the closed position.

One of these methods will be implemented by April 1, 1982.

Sincerely yours,



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

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cc - Mr. Robert Nelson, US NRC