

50-305

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## DESCRIPTION

LTR NOTORIZED 7-30-76,....  
TRANS THE FOLLOWING.....

## ENCLOSURE

AMDT NO 17 TO OPERATING LICENSES CHANGE  
19 TO TECH SPEC....CHANGE IS REQUESTED TO  
PROVIDE RELIEF FROM REPORTING REQUIRE-  
MENTS WITHIN THE ENVIRO SPEC.....W/REVISED  
PAGES.....

DO NOT REMOVE  
ACKNOWLEDGED

PLANT NAME: KEWAUNEE

## SAFETY

## FOR ACTION/INFORMATION

## ENVIRO

8-2-76 RB

ASSIGNED AD:  
☒ BRANCH CHIEF: Schwencer  
PROJECT MANAGER:  
☒ LIC. ASST.: S. SHEPPARD

ASSIGNED AD:  
BRANCH CHIEF:  
PROJECT MANAGER:  
LIC. ASST.:

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GOSSICK & STAFF	ENGINEERING	IPPOLITO	ENVIRO TECH.
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CASE	KNIGHT		BALLARD
HANAUER	SIHWEIL	OPERATING REACTORS	SPANGLER
HARLESS	PAWLICKI	STELLO	
			SITE TECH.
PROJECT MANAGEMENT	REACTOR SAFETY	OPERATING TECH.	GAMMILL
BOYD	ROSS	EISENHUT	STEPP
P. COLLINS	NOVAK	SHAO	HULMAN
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HELTEMES	AT & I		BUNCH
SKOVHOLT	SAITZMAN		J. COLLINS
	RUTBERG		KREGER

## EXTERNAL DISTRIBUTION

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LPDR: KEWAUNEE, WI  
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NAT LAB:  
REG. VIE  
LA PDR  
CONSULTANTS

BROOKHAVEN NAT LAB  
ULRIKSON(ORNL)

7722

WISCONSIN PUBLIC SERVICE CORPORATION

Public Service

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

July 30, 1976

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

ATTN: Mr. Victor J. Stello, Director  
Division of Operating Reactors

Gentlemen:

REF: Docket 50-305  
Operating License DPR-43  
Letter from J. G. Keppler to Wisconsin  
Public Service Corporation dated July 2, 1976

Please find attached 40 copies of Proposed Amendment No. 17,  
Change No. 19, to the Kewaunee Plant Technical Specifications.

The proposed change is requested to provide relief from reporting requirements within the environment specification, Appendix B. Currently we are required to provide notification to the Division of Inspection and Enforcement within twenty-four hours of our failure to record environmental monitoring data required by the Technical Specifications.

The failure to record this data has absolutely no effect upon the environment and is most certainly not worth the manpower expenditure by neither the NRC nor us which is now required by this reporting requirement.

It should be noted that the majority of failures to perform the required monitoring has been a result of computer failures and operators who are involved in a more important, possibly safety related, activity failing to make a reading or draw a sample.

Mr. Keppler's referenced letter shared our concern of ineffective utilization of manpower in having to report such occurrences within twenty-four hours. We, therefore, propose that the current Appendix A reporting requirements for serious matters be modeled in Appendix B for violations of environmental conditions for operations which have fixed limits, and that the failure to conform to the monitoring requirements of Appendix B be reportable within thirty days.

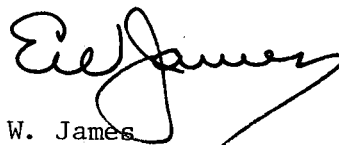
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U. S. Nuclear Regulatory Commission  
Page 2  
July 30, 1976

We believe, as Mr. Keppler stated in his letter, that such proposed changes are in your and our best interests.

Since these proposed changes are not technical in nature and do not impact safety directly, hopefully, the amendment can be issued expeditiously.

Very truly yours,



E. W. James  
Senior Vice President  
Power Supply & Engineering

EWJ:sna

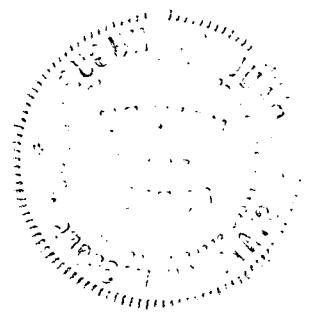
Enc.

Subscribed and Sworn to  
Before Me This 30TH Day  
of July 1976

  
Notary Public, State of Wisconsin

My Commission Expires

9-13-79



## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Actions to be Taken in the Event of Violation of the Environmental Technical Specifications

#### 5.2.a Limiting Conditions for Operations Violations

1. Any occurrence in violation of Section 2.1 through and including Section 2.2.2 of the Environmental Technical Specifications shall be reported and promptly reviewed by the Plant Operations Review Committee. The occurrence shall be reported to the Superintendent Nuclear Power, Superintendent-Kewaunee Plant and the Staff Environmental Engineer or their designees.
2. The Plant Operations Review Committee (PORC) shall prepare a separate report for each such occurrence. This report shall include an evaluation of the cause of the occurrence and also recommendations for appropriate action to prevent or reduce the probability of a re-occurrence.
3. The Staff Environmental Engineer responsible for the program shall prepare a report of his findings.
4. Copies of all such reports shall be submitted to the Superintendent - Nuclear Power, and to the Superintendent - Steam Plants for review and approval of any recommendations.
5. The Plant Superintendent or his designee shall notify the NRC within 24 hours; as specified in Specification 6.9, Appendix A, of the circumstances of any occurrences. A written report shall follow in accordance with the requirements of Specification 6.9 of Appendix A.
6. All such occurrences shall be reported in accordance with Plant Operating Requirements, Section 5.4.b of Appendix B.

#### 5.2.b Monitoring Condition Non-Conformances

1. Any occurrence in violation of Sections 2.2.3, 3.1 through and including 3.2.3 of the Environmental Technical Specifications shall be reported to the Superintendent - Kewaunee Plant and reviewed by the Plant Operations Review Committee (PORC). The Superintendent-Kewaunee Plant shall document the corrective actions taken to reduce re-occurrence probability.
2. All such occurrences shall be reported in accordance with Section 5.4.c of Appendix B.

## 5.0 ADMINISTRATIVE CONTROLS

### 5.4 Plant Reporting Requirements

In addition to reports required by applicable regulations, Wisconsin Public Service Corporation shall provide the following information:

a. Annual Environmental Operating Report

An Annual Environmental Operating Report covering the previous twelve month's operations and surveillance monitoring shall be submitted within 60 days after January 1 of each year.

b. Reporting Requirement - 24 Hours and Subsequent Two Week Followup Report

Any occurrence as noted in Section 5.2.a shall be reported to the Nuclear Regulatory Commission within 24 hours by telephone and telegraph to Office of Inspection & Enforcement, Region III.

A written followup report shall be submitted within two weeks to the Director, Region III, Office of Inspection & Enforcement. The followup report shall describe the event, determine the cause of the violation, analyze and evaluate the implications, and prepare an outline of the corrective measures taken or planned to prevent re-occurrence. In addition, the report shall relate any violation of these specifications to any significant environmental impact.

c. Reporting Requirements - 30 Days

A written report shall be submitted within 30 days to the Director, Region III, Office of Inspection & Enforcement following any occurrence noted in Section 5.2.b. The written report shall include, as a minimum, a completed copy of a licensee event report form.

d. Changes to the Plant or Procedures

A written report should be forwarded to the Director, Office of Nuclear Reactor Regulation, USNRC, Washington, D.C. 20555 with a copy to the Director, Region III, Office of Inspection & Enforcement, in the event of:

## 5.0 ADMINISTRATIVE CONTROLS

1. Proposed changes to the plant that would result in more severe environmental impact than evaluated in the Environmental Report and the Environmental Statement should be submitted for NRC approval. These changes do not preclude making changes on short notice that are significant in terms of decreasing the adverse environmental impact.
2. Changes to environmental monitoring equipment or procedures.
3. Changes or additions to permits and certificates requested by Federal, State, Local and Regional authorities for the protection of the environment. When submittals of the changes are made to the concerned agency, the copy shall be submitted to the NRC as noted above. The report shall include an evaluation of the impact of the change.
4. Request for approval of changes in the environmental technical specifications. The request shall include an evaluation of the impact of the change.

### e. General Reporting Requirements

If harmful effects or evidence of irreversible damage are detected by the monitoring programs, the licensee will provide to the NRC an analysis of the problem and plan of action to be taken to eliminate or significantly reduce the detrimental effects or damage.