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FROM: WISCONSIN PUBLIC SERVICE CORP
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DESCRIPTION

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PLANT NAME: **KEWAUNEE**

ENCLOSURE

TECH SPEC AMDT NO 8 CHANGE NO 10 WITH UPDATING INSTRUCTIONS.....

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	CASE	KNIGHT	OPERATING REACTORS	GAMMILL
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			OPERATING TECH	
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EXTERNAL DISTRIBUTION			CONTROL NUMBER
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WISCONSIN PUBLIC SERVICE CORPORATION



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

March 8, 1976

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50-305



Mr. D. Neighbors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Neighbors:

Attached is Amendment No. 8, Change No. 10, to the Kewaunee Operating License and Technical Specifications for inclusion in your copy of the Kewaunee Technical Specifications.

Instructions for updating the Specifications and the most recent copy of the Technical Specification Revision Control Sheet are also attached.

Sincerely,

M. E. Stern
Nuclear Licensing &
Systems Supervisor

MES:bam

Attach.



2349

Technical Specifications

Amendment No. 8 Change No. 10

Attached are the page changes and insertions associated with Amendment No. 8 to the Operating License and Change No. 10 to the Technical Specifications.

The Technical Specification Revision Control Sheets have been updated. Please discard previously issued revision control sheets.

Page 3 of the Facility Operating License has been revised. Please replace the Page 3 of the Facility Operating License with the attached revised Page 3.

The following is a tabulation of pages which are out of date requiring removal and revised pages to be inserted into the Technical Specifications.

<u>Remove Pages</u>		<u>Insert Pages</u>	
ES 2.1-1	No date	ES 2.1-1	1/23/76
ES 2.2-1	No date	ES 2.2-1	1/23/76
ES 2.2-3	3/20/75	ES 2.2-3	1/23/76
ES 2.2-4	3/20/75	ES 2.2-4	1/23/76
ES 2.2-5	3/20/75	ES 2.2-5	1/23/76
ES 2.2-6	3/20/75	ES 2.2-6	1/23/76
ES 4.1-1	No date	ES 4.1-1	1/23/76
ES 4.1-3	No date	ES 4.1-3	1/23/76
ES 4.1-4	No date	ES 4.1-4	1/23/76
ES 4.1-5	3/20/75	ES 4.1-5	1/23/76
ES 4.2-1	No date	ES 4.2-1	1/23/76
ES 4.2-3	No date	ES 4.2-3	1/23/76
ES 5.1-1	No date	ES 5.1-1	1/23/76
ES 5.2-1	No date	ES 5.2-1	1/23/76
ES 5.3-1	No date	ES 5.3-1	1/23/76
ES 5.4-1	No date	ES 5.4-1	1/23/76
ES 5.4-2	No date	ES 5.4-2	1/23/76
ES 5.5-1	No date	ES 5.5-1	1/23/76

TECHNICAL SPECIFICATION REVISION CONTROL

<u>WPS Change No.</u>	<u>WPS Amend. No.</u>	<u>Date</u>	<u>Pages</u>	<u>NRC Change No.</u>	<u>NRC Amend. No.</u>	<u>Date</u>	<u>FSAR Amend.</u>
1	---	3-15-75	TS 3.3-2, TS 3.3-3 TS 3.3-8	1	---	4-3-74	
2	---	4-5-74	TS 6.1-2	2	---	4-19-74	
3	1	4-9-74	Table 4.10-1 (pg. 1, 2, 4, 6)	3	1	5-21-74	
			TS 6.1-2	4	2	7-26-74	
5	3	9-4-74	TSii, TSv, TS3.10-1 thru TS 3.10-18 Fig. TS 3.10-1 - 3.10-6 Table TS 4.1-1 (pg. 1 of 3, 3 of 3)				35
6	4	9-30-74	TS 4.2-3 thru 4.2-7 Table TS 4.2-1 (pg. 9 of 14)				
7	5	10-4-74	ES 2.2-3 thru 2.2-6	5	3	3-20-75	
8	6	11-5-74	ES 4.1-5 & 4.1-6	8	6	3-20-75	
9	7	1-15-75	TSi, TSiii, TS1.1-1 thru TS1.1-5, TS 3.6-1, TS 4.9-1 TS 6-1 thru 6-34	7	5	12-18-75	

TECHNICAL SPECIFICATION REVISION CONTROL

<u>WPS</u> <u>Change No.</u>	<u>WPS</u> <u>Amend. No.</u>	<u>Date</u>	<u>Pages</u>	<u>NRC</u> <u>Change No.</u>	<u>NRC</u> <u>Amend. No.</u>	<u>Date</u>	<u>FSAR</u> <u>Amend.</u>
(See WPS Letter		12-20-74)	Table TS4.1-3 (Item 10)	6	4	1-20-75	
10	8	2-14-75	New Sec. 3.12 & 4.12	Withdrawn by letter 10-28-75			
11	9	8-1-75	ES 2.1-1, 2.2-1, 2.2-3, 2.2-4, 2.2-5, 2.2-6, 4.1-1, 4.1-3, 4.1-4, 4.1-5 4.2-1, 4.2-3, 5.1-1, 5.2-1 5.3-1, 5.4-1, 5.4-2, 5.5-1	10	8	1-23-76	
12	10	7-10-75	TS4.13-1, 4.13-2	9	7	10-21-75	37
13	11	8-14-75	TS3.13 New Section Table TS3.5-1				
14	12	9-10-75	ES2.2-3 and 2.2-4	10	8	1-23-76	
15	13	12-18-75	TS3.3-1 and TS3.3-2; TS3.10-1, 4, 5, 7, 9, 11, 13, 14, 15; Figure TS3.10-3; Table TS 3.5-2 (page 3)				
16	14	2-9-76	TS3.9-1, 3.9-2, 3.9-5 3.9-7, 3.9-9, 3.9-10, TS4.11-1, Table TS4.1-2				

physical form for sample analysis or instrument calibration or associated with radioactive apparatus or components;

- (5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility".

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR, Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensees are authorized to operate the facility at steady state reactor core power levels not in excess of 1650 megawatts (thermal).

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications, as revised by issued changes thereto through Change No. 10.

- D. The licensees shall comply with applicable effluent limitations and other limitations and monitoring requirements, if any, specified pursuant to Section 401(d) of the Federal Water Pollution Control Act Amendments of 1972.
- E. This license is effective as of the date of issuance and shall expire at midnight, August 6, 2008.

2.0 ENVIRONMENTAL PROTECTION CONDITION

2.1 Thermal

2.1.1 Maximum ΔT across the condenser

Objective: Limit the temperature rise across the condenser.

Specification: During normal power operation, the maximum ΔT across the condenser shall not exceed 20°F when the forebay temperature is greater than 40°F. When the forebay temperature is 40°F or less, the maximum ΔT across the condenser shall not exceed 28°F

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Whenever the temperature increment (ΔT) is above the specified limits for more than one hour, action shall be taken to determine the reason for the temperature increase and its expected duration, and corrective action shall be taken to reduce the ΔT to within the specified limits. These occurrences shall be recorded and reported in accordance with the Plant Reporting Requirements.

Bases: The rise of intake water temperature across the condenser is a fixed value based upon initial condenser design, circulating water pump operation, and the plant's power level.

3.0 MONITORING EQUIPMENT

3.1 Thermal

3.1.1 Maximum ΔT across the condenser

Objective: To monitor the intake and discharge temperatures to assure that the allowable ΔT across the condenser is not exceeded.

Specification: The intake water temperature shall be measured from one temperature element located in the forebay and recorded every hour. The discharge temperature shall be measured in the four water boxes of the condenser. These four points shall be recorded every hour.

The backup system consists of a continuous printout of the average from two temperature elements in the forebay. The discharge temperature shall be read locally at the condenser. Both intake and discharge temperatures shall be recorded hourly when the computer is out of service.

Bases: The intake and discharge temperature will be computer monitored in the control room which will provide a reliable method for determination of temperature differential across the condenser.

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2.0 ENVIRONMENTAL PROTECTION CONDITION

2.2 Chemicals

2.2.1 Chlorination of Circulating Water System

Objective: To limit the amount of residual chlorine discharged to the lake.

Specification: Should the circulating water system be chlorinated, the duration of chlorination shall not exceed 2 hours during any 24 hour day. The concentration of the total residual chlorine in the effluent circulating water shall not exceed 0.1 mg/l. Should the total residual chlorine in the effluent exceed 0.1 mg/l, all practicable measures to reduce it to below that level shall be taken.

Bases: Based on the intake water turbidity plus the lack of a need for chlorination during the first 18 months of operation of Point Beach Unit 1, chlorination might not be necessary to control slime in the Kewaunee Plant condenser.

However, should chlorination be necessary, the total residual chlorine in the discharge water should not exceed 0.1 mg/l for a maximum of 2 hours/day. The concentration in the discharge stream is permitted to be twice the 2 hour level in the receiving water in view of the expected rapid decline in concentration after discharge, by dilution and reaction with chlorine demand constituents in the lake. This specification would be consistent with meeting the 0.05 mg/l for a maximum of 2 hours/day recommended by the United States Environmental Protection Agency.

3.0 MONITORING REQUIREMENTS

3.2 Chemicals

3.2.1 Chlorination of the Circulating Water System

Objective: To monitor the amount of total residual chlorine in the discharge water.

Specification: During periods of chlorination, samples of circulating water shall be taken five (5) minutes before and 5 minutes after the start of chlorination, at the mid-point and at the end of the chlorination period.

Samples shall be taken immediately following the condenser and shall be analyzed for total residual chlorine using the amperometric method of analysis. In the event the amperometric instrument is being serviced, a colorimetric method of analysis may be utilized for a period not to exceed one week.

Bases: The amperometric method of analysis will ensure accurate results which will allow for complete documentation of chlorine residuals in the circulating water system and receiving waters.

The colorimetric method of analysis will serve as a backup should the amperometric titrator fail.

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2.0 ENVIRONMENTAL PROTECTION CONDITION

2.2.2 Suspended and Dissolved Solids

Objective: To limit the total amount of solids discharged to the lake.

Specification: The pH of the solution released from the neutralizing tank shall be within the range of 6 to 9 before dilution in the circulating water system.

For normal power operation, the average incremental increase in the concentration of total solids in the circulating water resulting from the neutralizing tank discharge shall not exceed 2.0 mg/l when calculated during periods of each discharge.

The total annual release from the neutralizing tank shall not exceed 325 tons of total solids.

Bases: The demineralizer system consists of twin cation, anion, and mixed bed units used to ensure that the product water is high quality water capable of meeting stringent Nuclear Steam Supply System Specifications.

During normal power operation, it is expected that approximately 22,000 gallons of neutralized waste will be discharged from the primary cation and anion regeneration process once every day while 3600 gallons of neutralized waste from the mixed bed regenerations will be discharged three

3.0 MONITORING REQUIREMENTS

3.2.2 Suspended and Dissolved Solids

Objective: To monitor the total amount of solids discharged to the lake.

Specification: Neutralizing Tank

The pH of the solution in the neutralizing tank shall be determined on a representative sample and the resulting pH recorded in the discharge log book.

Prior to release of waste from the neutralizing tank, a representative sample shall be analyzed for suspended, dissolved and total solids. The total amount in gallons released and the time required for discharge shall be recorded.

Miscellaneous Discharge

The pH and total suspended solids shall be determined for condenser hotwell prior to discharge to the circulating water system. The determination shall be made from a representative grab sample.

The discharges from the turbine building sump water softening unit and the water pretreatment system lagoon shall be characterized by daily grab samples. These daily grab samples shall be analyzed for pH and total suspended solids.

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2.0 ENVIRONMENTAL PROTECTION CONDITION

Bases: times a month. It is possible that on any given day, the chemical discharges from the neutralizing tank may contain wastes from both the primary cation and anion units and mixed bed units.

Specification: Miscellaneous Discharge

A record of the pH and suspended solids analyses shall be maintained along with the total amounts of solids and fluids discharged.

Bases: Analysis of a representative sample from the waste neutralizing tank, before dilution with the circulating water system, by Standard Methods or its equivalent will ensure that each batch discharged from the neutralizing tank is documented. Laboratory measurement of the pH of the water solution will ensure that the wastes are neutralized before release.

Analysis of a representative sample of the miscellaneous discharges, before dilution with the circulating water system, by Standard Methods or its equivalent, will ensure that each discharge path is characterized.

2.0 ENVIRONMENTAL PROTECTION CONDITION

2.2.3 Treatment Chemicals

Objective: To identify and quantify all treatment chemicals.

Specification: The total amounts of all raw chemicals added or used in the plant, identified below, shall be reported annually.

1. Primary System
 - a. Boric acid
2. Secondary treatment chemicals
 - a. Hydrazine
3. Pre-treatment system chemicals
 - a. Ferric Sulfate
 - b. Lime
 - c. Polyelectrolyte
 - d. Hypochlorite
 - e. Sodium Sulfite
4. Demineralizer System
 - a. Caustic Soda
 - b. Sulphuric acid
5. Potable Water Softeners
 - a. Salt
6. Condenser
 - a. Hypochlorite
7. Component Cooling System
 - a. Chromates

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3.0 MONITORING REQUIREMENTS

3.2.3 Treatment Chemicals

Objective: To monitor the total amount of treatment chemicals discharged to the circulating water.

Specification: A record shall be kept of all raw treatment chemicals used in plant operations.

Bases: The chemicals used in the different processes within the plant are required to provide safe and efficient operation of the various unit operations. All chemicals are added to these systems on an "as needed" basis.

2.0 ENVIRONMENTAL PROTECTION CONDITION

3.0 MONITORING REQUIREMENTS

Bases: Boric acid is used as chemical shim during plant operation in order to control reactivity within the primary cycle.

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Hydrazine is used as a reducing agent to remove oxygen in the steam cycle system. At high temperatures, hydrazine decomposes to ammonia which in turn is used to control the pH in the steam cycle system. No other chemicals are introduced to the steam cycle system for treatment. The chemicals added to the pre-treatment system are ferric sulfate to coagulate the turbidity in the water, lime to presoften the water, polyelectrolyte to aid in the development of the floc, hypochlorite solution to kill bacteria and sterilize the water and sodium sulfite to reduce any free chlorine before entering the demineralizers.

Caustic soda and sulphuric acid are used in the demineralizer system regeneration process while salt is used to regenerate the water softener.

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4.0 ENVIRONMENTAL SURVEILLANCE AND SPECIAL STUDIES

4.1 Biological

4.1.1 Aquatic

- a. General Ecological Survey to evaluate the contribution of the plant discharges on the biotic stresses in the lake and including possible long term effects.

Objective: The specific aims of the general survey are as follows:

1. Identify certain physical characteristics such as water temperature, local lake currents, and bottom contours in the immediate plant influence.
2. Investigate benthic macroinvertebrates, zooplankton, phytoplankton, and periphyton populations and their distribution within the area of the thermal plume, intake, and in nearby control areas.
3. Characterize the distribution of fish at different seasons in the vicinity of the intake and discharge.
4. Determine whether the warm water discharge or intake of cooling water is having an adverse impact on the life history of fish in the vicinity of the plant.
5. Determine changes in the bacteriological and chemical makeup of the Lake Michigan waters in the vicinity of the plant.
6. Determine a numerical predictive model for the thermal plume and measure the shape and extent of the thermal plume during plant operation.

Specification:

1. A general ecological survey shall be undertaken for two years after the plant becomes operational.
 - a. Data collected during the two years of the program shall be reviewed and evaluated by the licensee and the NRC to determine whether the program should be modified or discontinued.
 - b. The program may be modified as necessary to accommodate changes occurring during the survey. These changes shall be reported in accordance with Plant Reporting Requirements.
 - c. A summary of the progress and results of these studies shall be reported in accordance with Plant Reporting Requirements.
 - d. The frequency of the field sampling program shall be in accordance with Table ES 4.1.1-1.
 - e. Sampling locations and the parameters sampled shall be established in accordance with Figure ES 4.1.1-1.
2. Water Column Profile Locations
 - a. Seventeen profile sampling locations shall be established in accordance with Figure ES 4.1.1-1. Five

4.0 ENVIRONMENTAL SURVEILLANCE AND SPECIAL STUDIES

Copper
Fluoride
Hardness, Total
Hydrazine
Iron
Iron, Total
Lead

Solids, Total Dissolved
Solids, Total Suspended
Sulfate
Temperature Profiles
Turbidity
Zinc

5. Lake Currents - Lake currents in the vicinity of the thermal plume shall be measured continuously by current meters and current direction by drogues during the sampling period and during special studies.
6. Phytoplankton
 - a. Duplicate water samples for phytoplankton analysis shall be collected at seven stations at a depth of one meter below the lake surface.
 - b. A species checklist and enumeration shall be compiled for each sample.
7. Zooplankton
 - a. Zooplankton samples shall be collected from fifteen locations.
 - b. Four replicate samples shall be taken at each location.
 - c. Organisms shall be identified to the lowest positive taxonomic level and enumerated.
 - d. Populations shall be analyzed to determine the difference between locations.
8. Periphyton
 - a. Periphyton samples shall be collected from naturally occurring rock substrates at each of the three sampling locations.
 - b. The color, species composition, and abundance of the attached algae and the type of substrate upon which it grows shall be noted.
 - c. A species checklist, including the relative abundance of each species, shall be prepared for each sample to determine differences and similarities among locations.
9. Benthos
 - a. Benthos samples shall be taken at nine locations.
 - b. Organisms shall be identified to the lowest positive taxonomic level and enumerated in abundance per square meter.
10. Fish
 - a. Gill nets shall be used to sample fish populations at three locations.
 - b. Minnow seining shall be conducted at three locations.
 - c. Fish eggs and larvae shall be sampled and identified at six locations during the spawning season for local species.
 - d. All fish, except alewife and smelt, shall be identified and measured, those fish larger than 10 inches shall also be weighed and checked for parasite markings and disease. A subsample of 20 individuals of each species (alewife and smelt) will be taken to determine the size range of the catch and to provide ample data for calculation of mean lengths, weights and condition.

4.0 ENVIRONMENTAL SURVEILLANCE AND SPECIAL STUDIES

- e. Scale samples shall be taken for age and growth analysis for selected species.
- f. Stomach samples shall be taken from selected species for food habit determination.

Bases: The general ecological survey of the aquatic environment in the vicinity of the Kewaunee Plant will provide the necessary information to compare three years of pre-operational study with data taken during the two years of operational study.

Bottom contours of the discharge area will help to analyze the effect that the circulating water velocity has upon the bottom.

The primary source of data on currents has been with continuous measurements with current meters. Drogues are used to obtain current direction data for comparison with current meter data and when specialized studies such as obtaining time-temperature data or defining eddy circulation patterns are required.

By using a benthic pump and a diver to collect benthos samples, a very reliable sample is obtainable which will allow better determination of the thermal influence of the plume upon benthic organisms.

The setting of gill nets with one 300 foot panel of 2½ inch stretched mesh, one 300 foot panel of 3½ inch stretched mesh, one 300 foot panel of 5½ inch stretched mesh and one 50 foot panel of 1½ inch stretched mesh for a twelve hour period will allow a representative sampling of fish, which will aid in the determination of fish density before and after plant operation.

Water Column Profile data will be examined to determine the degree of similarity in the water masses which make up the study area. Seasonal differences will be noted.

Water quality data will be determined and compared to state and federal standards and data collected from other areas of the lake.

Bacteriological data, along with BOD results, will aid to determine the presence of domestic and/or agriculture wastes near the site.

Phytoplankton data will assist in determining the water quality and nutrient levels to support algae growth near the site. Abundance of specific species will present a basis for comparing the study area to other regions where similar surveys are being conducted.

Periphyton data will be used to determine the effect of the discharge on growth and species composition of the awfuchs community.

4.0 ENVIRONMENTAL SURVEILLANCE AND SPECIAL STUDIES

4.1.1 Aquatic

b. Entrainment and Impingement

Objective: To determine the effects of entrainment of phytoplankton and zooplankton and the impingement of fish on the traveling screens.

Specification: Entrainment and impingement studies shall continue for two years after the plant becomes operational. A summary of the progress and results of these studies shall be reported in accordance with Plant Reporting Requirements. Data collected during the two years of the program shall be evaluated by the licensee and the NRC to determine whether the program should be modified or discontinued.

1. Fish Impingement

The number, size and weight of all individual fish collected in a 24 hour period in the circulating cooling water trash basket shall be identified and quantified by plant personnel a minimum of twice per week during circulating water pump operation. An inspection of the trash basket should be made at least once per shift. If the number of smelt and alewives captured in the trash basket exceeds 50, the average size and weight and an estimate of the total number shall be determined from a subsample of approximately 10% of the impinged species. No subsamples shall be taken when the number of a particular species of fish is 50 or less.

2. Phytoplankton Entrainment

- a. Phytoplankton analysis shall be conducted on samples from six locations; at the intake in the forebay, in the discharge, at two locations in the plume, and at one sampling location in a control area outside of the plume influence.
- b. Duplicate samples shall be taken and the concentration of chlorophyll a and photosynthetic rate as determined by ^{14}C uptake shall be determined at 7, 24, 48 and 72 hours after collection. Species composition and density shall be determined for selected sampling locations.

3. Zooplankton Entrainment

- a. Duplicate samples shall be collected from the same stations as the phytoplankton samples.

4.0 ENVIRONMENTAL SURVEILLANCE AND SPECIAL STUDIES

4.2 Physical

4.2.1 Aquatic Thermal Plume Mapping

Objective: To develop a numerical predictive thermal plume model and measure the shape and extent of the thermal plume during plant operation.

- Specification:
1. A numerical predictive thermal plume model for the condenser cooling water discharge shall be developed. This model shall include temperature isolines and velocity contours within the plume influence. The model shall consider the following:
 - a. It shall be a three-dimensional numerical model.
 - b. Bottom topography.
 - c. Influence of the Point Beach Plume.
 - d. Seasonal and spatial temperature variations.
 - e. Near-shore currents.
 - f. Sinking plume.
 - g. One and two pump operation.
 - h. Possibility of discharge waters causing a temperature rise at the intake structure.
 2. The shape and extent of the discharge plume shall be determined during the first year of operation when the plant is at full power. The objectives of the plume measurement shall be to:
 - a. Locate the center line of the plume.
 - b. Measure the rate of excess temperature decay along the centerline.
 - c. Measure the plume width and depth.
 - d. Evaluate the effects of ambient currents on the location of the plume centerline.
 - e. Evaluate the effect of the thermal bar on the plume.
 - f. Attempt to define the extent of the sinking plume in the winter.
 3. A summary of the results (analysis and conclusions) of this study shall be included in the Annual Environmental Operating Report.

Bases: As part of the Lake Michigan thermal standards adopted by the Division of Environmental Protection of the Wisconsin Department of Natural Resources, it is required that a predictive model and measurements of the Kewaunee Thermal Plume be analyzed.

4.0 ENVIRONMENTAL SURVEILLANCE AND SPECIAL STUDIES

4.2.2 Erosion

Objective: To determine the amount of shoreline erosion in the vicinity of the plant.

- Specification:
1. Aerial photographs of the shoreline shall be taken quarterly for two years after the plant becomes operational to aid in determining the effect of local erosion on the lake shoreline in the vicinity of the plant.
 2. A comparison of pre-operational and operational photographs shall be made.
 3. Discussion of the results of these observations shall be made annually in the Annual Environmental Operating Report.

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Bases: Aerial photographs will provide reliable data in order to determine the amount of erosion taking place along the lake shoreline in the vicinity of the plant as compared with the shoreline beyond the area of the plant influence.

4.2.3 De-icing Operation

Objective: To document periods of de-icing the circulating water intake structure.

Specification: Periods of de-icing operation and inlet temperatures of the incoming water shall be recorded on an hourly basis and documented in the Annual Environmental Operating Report.

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Bases: De-icing operations will occur when the intake waters approach the freezing point or when off-shore winds carry slush over the intakes. During these periods, approximately 3000 gpm of water will be sprayed over the intake cones. An additional 15,000 gpm and 10,000 gpm, depending on two or one pump operation, will be continuously added to the forebay by gravity feed from the discharge structure.

5.0 ADMINISTRATIVE CONTROLS

5.1 Organization, Review and Audit

a. Organization

1. The Plant Superintendent has on-site responsibility for the operation of the facility and to assure that the limits as noted in the environmental specifications as defined herein are not exceeded.
2. The Plant Superintendent shall report to the Superintendent - Nuclear Power. In the absence of the Plant Superintendent, an Assistant Superintendent will assume his responsibilities.
3. The Staff Environmental Engineer, reporting to the Senior Vice President - Power Supply and Engineering, has primary responsibility for the initiation and execution, by technically competent personnel, of the environmental surveillance and special studies which are required by the environmental technical specifications. In the absence of the Staff Environmental Engineer, the Environmental Specialist will assume his responsibilities. 10
4. The Staff Environmental Engineer has primary responsibility for directing the testing work as assigned to independent consultants who have the task of sampling and performing the studies.

b. Review and Audit

1. The Plant Operations Review Committee (PORC), as described in the Plant Technical Specifications, Appendix A, Section 6, shall have the responsibility of performing the review and audit of those sections of the program which refer to the allowable limits for temperature and chemical discharges.
2. The Nuclear Safety Review and Audit Committee, as described in the Plant Technical Specifications, Appendix Section 6.0, supplemented as necessary by technically qualified personnel, shall have the responsibility of performing the review and audit of the environmental monitoring, surveillance, and special studies programs as they pertain to plant operations. 10

5.0 ADMINISTRATIVE CONTROLS

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

- a. Any occurrence in violation of any portion 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. 10
- b. 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.
- c. The Staff Environmental Engineer responsible for the program shall prepare a report of his findings. 10
- d. 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.
- e. 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. 10
- f. All such occurrences shall be reported in accordance with Plant Operating Requirements. 10

5.0 ADMINISTRATIVE CONTROLS

5.3 Operating Procedures

- a. Detailed written procedures including check-off lists and instructions, where applicable, shall be prepared, approved, and adhered to for the following:
1. Control of additions of chemicals for both the primary and secondary systems.
 2. Control of release of chemicals in the circulating water discharge.
 3. Control the flow of discharge waters to remain within the allowable rate of change and discharge temperatures.
 4. Sampling methods, frequencies and locations.
 5. Preventive or corrective procedures which could have an effect on the environmental aspects of the plant.
 6. Calibration procedures for various instruments used in measuring and analyzing the samples which are required by these specifications.
- b. All procedures, as they pertain to these specifications, shall be reviewed by the PORC and approved by the Plant Superintendent prior to implementation. Temporary changes to procedures which do not change the intent of the original procedure may be made provided such changes are approved by a member of the plant management staff and the Staff Environmental Engineer responsible for the program. Such changes shall be documented and subsequently reviewed by the PORC and approved by the Plant Superintendent.

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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

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

c. Reporting Requirement - 10 Days

A written report shall be submitted within 10 days to the Director, Region III, Office of Inspection & Enforcement with a copy to the Director, Office of Nuclear Reactor Regulation, USNRC, Washington, D.C. 20555, of any event previously reported under the provisions of 5.4.b above. The 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.

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:

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.

5.0 ADMINISTRATIVE CONTROLS

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. | 10

5.0 ADMINISTRATIVE CONTROLS

5.5 Record Retention

a. Record Retention - 5 Years

Records and/or logs relative to the following items shall be kept in a manner convenient for review and retained for five years.

1. Records of normal plant operation, including power levels and periods of operation at each power level.
2. Records of principal maintenance activities, including repair, substitution or replacement of principal items of equipment pertaining to environmental impact.
3. Records of occurrences in violation of environmental technical specifications.
4. Records of periodic checks, inspections and calibrations performed to verify that environmental surveillance requirements are being met.
5. Records of any special operational modes (tests or experiments).
6. Records of changes made to procedures, equipment, permits and certificates.
7. Records of changes to operating procedures.

b. Record Retention - Life of Plant

Records relative to the following items shall be kept in a manner convenient for review and retained for the life of the plant.

1. Records of a complete set of as-built drawings for the plant as originally licensed and all print changes showing modifications made to the plant.
2. Records of off-site environmental monitoring surveys.
3. Plant Operations Review Committee meeting minutes.
4. Nuclear Safety Review and Audit Committee meeting minutes.