NRC FORM 195 (2-76)

U.S. NUCLEAR REGULATORY COMMISSION

DOCKET NUMBER 50-305

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| Mr. R.A. Purple | Wisconsin Public Svc. Corp.<br>Green Bay, Wisconsin<br>E.W. James | 2-4-76<br>DATE RECEIVED<br>2-7-76 |

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DESCRIPTION

Ltr. re. our ltr. of 12-29-75...
Proposed Amdt. to OL/Change to Tech. Specs;
Consisting of revisions with regard to The
Safety Evaluation to the Kewaunee Plant.....

(1 Copy Received)

PLANT NAME: ,Kewaunee, Wisconsin

ENCLOSURE

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ACKNOWLEDGED

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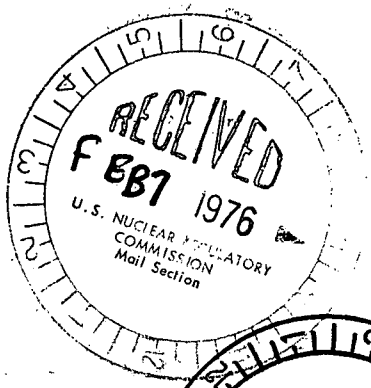
NRC FORM 195 (2-76)

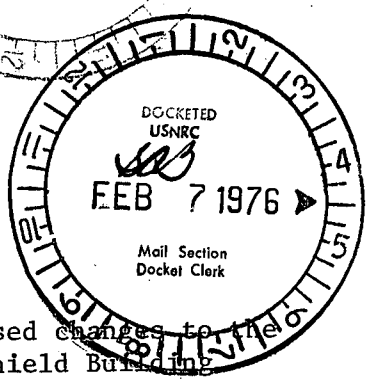
# WISCONSIN PUBLIC SERVICE CORPORATION

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

Regulatory File Cy.

February 4, 1976




Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Mr. R. A. Purple

Dear Sir:

REF: Docket 50-305
Operating License DPR-43
Letter from Mr. R. A. Purple to Wisconsin Public Service dated December 29, 1975, with enc.: 1. Proposed Changes to Tech Specs
2. Safety Evaluation

The referenced letter of December 29, 1975, proposed changes to the Kewaunee Plant Technical Specifications concerning the Shield Building Ventilation System (SBV), the Auxiliary Building Special Ventilation System (ASV), and the Spent Fuel Pool Sweep System (SFPSS). These proposed Technical Specifications have been reviewed by our Architect Engineer (Fluor-Pioneer), Nuclear Consulting Services Inc., and ourselves to evaluate the applicability of these specifications to the Kewaunee Plant.

This review indicated the following:

1. The design of the Kewaunee Plant was prior to ANSI N510-1975 and this design does not incorporate the features which would allow testing in accordance with ANSI N510-1975 at the present time.

2. The Kewaunee Plant design includes a secondary containment concept of a shield building and a special ventilation system for penetration areas. Operation of these systems for extended time periods is in conflict with previously agreed upon methods of operation in view of the regulations and environmental conditions necessary for equipment, which is required for normal operation.

3. Experience with filter systems test results is mainly site dependent. Adequate data does not exist to justify continuing the testing interval included in the present Kewaunee Technical Specifications. The test interval for the ANSI N510-1975 Section 8 and 9 tests proposed in the proposed changes to the Technical Specifications appears to be reasonable.

The results of the review have altered our position in regards to the proposed specifications; however, this review clearly indicates that complete conformance to the proposed specification may not be possible without modification of equipment and/or previous requirements of the Commission

The following is suggested as a course of action in the resolution of proper Technical Specifications for the Kewaunee Plant in regards to safeguard related filter systems and a description of the specific problem areas requiring resolution:

1. The licensee shall attempt to comply with the refueling interval testing specifications of the proposed Technical Specifications considering that the Kewaunee Plant was designed prior to issuance of ANSI-N510. Minor modifications which will allow proper performance of specified tests will be implemented; however, major design changes impractical in that short refueling test period will not be performed.

   In this regard, Nuclear Consulting Services Inc. have been retained to perform such testing at Kewaunee during the first refueling scheduled for February 15, 1976. The acceptance criteria for this testing will be as specified in the proposed specifications. Upon completion of this testing Nuclear Consulting Services Inc. will provide a report which will document the results of the testing and address each conflict with ANSI N510-1975.

   We anticipate receipt of this report by early April and following receipt, we would be prepared to discuss with the Commission's staff the specific problems of complying with ANSI N510-1975 at Kewaunee.

2. The proposed specifications require a monthly operation of the safeguard filter systems for a period of 10 hours. This proposed requirement apparently did not consider the following:

   a. The Shield Building Ventilation System is designed to capture the containment leakage in the case of an accident by forming a low pressure annular sealed space about the containment.

      The air in this annular space is purified by the SBV System HEPA filters and charcoal absorbers. A small fraction of the purified air is discharged to atmosphere to maintain the vacuum condition of the shield building. Also, until the vacuum condition is developed upon system initiation the entire system flow is discharged to atmosphere after purification. As presented in the FSAR, this system's discharge to atmosphere is not monitored.

      To perform monthly surveillance tests it is proposed that the air inventory of the shield building be characterized prior to the test by employing a portable air sampler and the results of this analysis will be documented. Since the shield building is a dead air space during normal operation with pipes and electrical cables passing

through it, to and from the containment; no significant radioactivity particulate and radio-gas levels are anticipated in the shield building, and the form of testing and monitor provides adequate safeguards against an unplanned release of radioactivity.

b. The Auxiliary Building Special Ventilation Zone System is a system which is designed to purify the air in the sections of the auxiliary building, where penetrations and safeguard equipment are located. The purpose of this system is to control possible leakage of contamination from penetrations and piping systems in the post-accident condition, plus provide cooling to safeguard operating equipment at that time. This system controls contamination by establishing a low pressure zone within the auxiliary building in a manner similar to that of the Shield Building Ventilation System within the shield building. Since this system is designed for post-accident contamination control and dose reduction, and since operation of the ASV System disables the normal auxiliary building ventilation system, operation of the ASV system for the 10 hours is not possible. The disabling of the normal ventilation system in the auxiliary building will result in an unacceptable environment for personnel and equipment during the proposed ASV System 10-hour test.

   During the refueling outage we intend to verify the operability of the ASV System by performance of an operationally oriented surveillance test.

We believe that significant differences exist between the Kewaunee Plant as designed and a "model" plant about which the proposed specifications were developed. Following the upcoming refueling, when additional information will become available, we would prefer to discuss the particular difficulties of implementing the proposed specifications at Kewaunee with the staff and arrive at an agreement as to what filter testing is reasonable and proper for Kewaunee.

Very truly yours,

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

EWJ:sna