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FROM: Wisconsin Public Svc. Corp. Green Bay, Wisconsin E.W. James		DATE OF DOC 10-28-75	DATE REC'D 10-30-75	LTR XXX	TWX	RPT	OTHER
TO: Mr. Bernard Rusche		ORIG 3 Signed	CC 37	OTHER	SENT NRC PDR SENT LOCAL PDR		XXX XXX
CLASS XXX	UNCLASS	PROP INFO	INPUT	NO CYS REC'D 40	DOCKET NO: 50-305		
DESCRIPTION: Letter notarized 10-28-75..Ltr Re. our request of 12-6-74.... Letter withdrawing submittal of Proposed Amdt. # 8 to the OL.... (40 Copies Received) PLANT NAME: Kewaunee.				ENCLOSURES:			

FOR ACTION/INFORMATION

SAB 10-31-75

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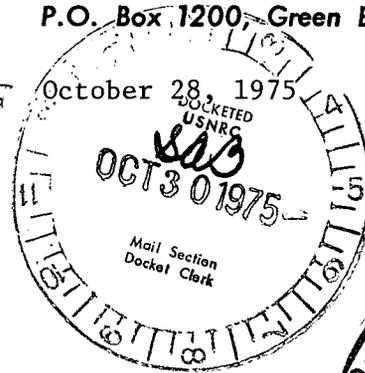
WISCONSIN PUBLIC SERVICE CORPORATION



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

Regulatory

File Cy.



Mr. Benard Rusche, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Rusche:

Subject: Proposed Amendment No. 8 to
Operating License DPR-43
Kewaunee Nuclear Power Plant
Docket 50-305

On February 14, 1975, in response to a Commission request dated December 6, 1974, we submitted Proposed Amendment 8 to Operating License DPR-43. We have subsequently reviewed this submittal in view of our safety analysis report and the safety evaluation. As a result of this review, we hereby withdraw our submittal of Proposed Amendment No. 8 to Operating License.

The reason for this withdrawal of the subject amendment is that, although the control room post accident filtration system is a design feature of the Kewaunee Nuclear Power Plant, credit for its operation was not assumed in the accident analysis of the plant, nor was credit for this system's operation assumed in the AEC Safety Evaluation. The assumption of proper operation of this system was not necessary to satisfy the accident analysis acceptance criteria. Therefore, we believe that this submittal which imposes additional unnecessary limiting conditions on the facility also imposes unnecessary additional costs on our customers.

The limiting conditions for operation currently specified in the Kewaunee Plant Technical Specifications establish surveillance test acceptance criteria requirements for certain filter systems which significantly exceeds the performance assumptions employed in the safety analysis for those filter systems.

The existing technical specifications in regards to filter system operation requirements and surveillance test requirements were developed in view of the particular design features of the Kewaunee Plant which are significantly different from the majority of other PWR facilities.

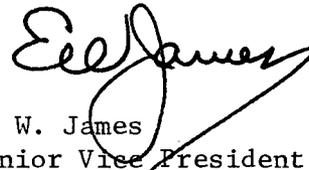
Though your request of December 6, 1974, included a further raising of the surveillance requirements and limiting conditions on other systems, we purposely did not submit a proposed change to the present Tech. Specs. in

these areas. The reason for our position, that this is not necessary, is that we already have a superior containment system. Therefore, the standard Tech. Specs. sent by your people have very little meaning if they are not addressed in light of our specific system.

We are concerned in this matter for two reasons. First, the nuclear power technology is a highly complex one. Licensed people operating the plants must be knowledgeable of the entire Tech. Specs. involvement. To unnecessarily add to this complexity is not in the interest of safety unless the benefit derived is of sufficient magnitude. Each additional requirement should be looked at by your people in the context of the whole Tech. Specs. and the total system the utility has supplied. Each addition, if only looked at by itself, gives a misleading benefit in its application to safety.

Secondly, if regulations are imposed without regard to the specific system they address, it will discourage the licensees from developing superior systems. Certainly this too is not in the best interest of the health and safety of the public.

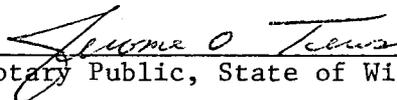
Very truly yours,



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

EWJ:sna

Subscribed and Sworn to
Before Me This 28TH Day
of OCTOBER 1975


Notary Public, State of Wisconsin

My Commission Expires
FEBRUARY 11, 1979