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CONTROL NO: 1707

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| FROM: Wis. Public Service Corp. Green Bay, Wis. 54305 | | DATE OF DOC 2-14-75 | DATE REC'D 2-18-75 | LTR XX | TWX | RPT | OTHER |
| TO: E.W. James Mr. E. Case | | ORIG 3 signed | CC 37 | OTHER | SENT AEC PDR <u>XX</u> SENT LOCAL PDR <u>XX</u> | | |
| CLASS | UNCLASS XXX | PROP INFO | INPUT | NO CYS REC'D 40 | DOCKET NO: 50-305 | | |

DESCRIPTION: Ltr notarized 2-14-75 submitted as AMDT #8 to Tech Specs consists of addition of Sections 3.12 & 4.12, Control Room Post Accident Recirculation System re our 12-6-74 ltr....& trans the following:

ENCLOSURES: Revised pages to Tech Specs...
(40 cys encl rec'd)

ACKNOWLEDGED
Do Not Remove

PLANT NAME: Kewaunee Plant

FOR ACTION/INFORMATION

DHL 2-18-75

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EXTERNAL DISTRIBUTION

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| <ul style="list-style-type: none"> ✓ - LOCAL PDR <u>Kewaunee, Wis.</u> ✓ - TIC (ABERNATHY) (1)(2)(10) ✓ - NSIC (BUCHANAN) 1 1 - ASLB ✓ - Newton Anderson ✓ 12 - ACRS NOTING SENT TO LIC. ASST. SHEPARD 2-18-75 | <ul style="list-style-type: none"> _____ - NATIONAL LABS 1 - W. PENNINGTON, Rm E-201 GT 1 - CONSULTANTS NEWMARK/BLUME/AGBABIAN | <ul style="list-style-type: none"> 1 - PDR-SAN/LA/NY 1 - BROOKHAVEN NAT LAB 1 - G. ULRIKSON, ORNL 1 - AGMED (RUTH GUSSMAN) Rm B-127 GT 1 - J. D. RUNKLES, Rm E-201 GT |
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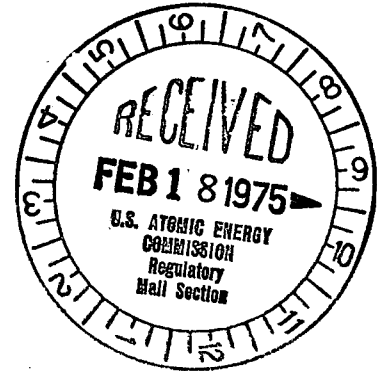
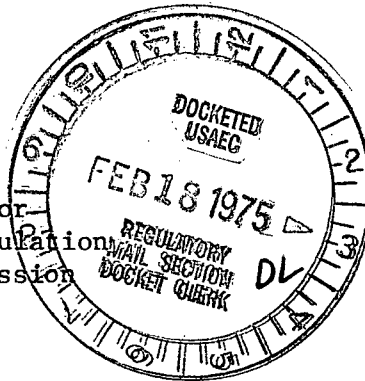
WISCONSIN PUBLIC SERVICE CORPORATION



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

February 14, 1975

Mr. Edson Case, Acting Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Case:

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

We submit herewith thirty-seven (37) copies of Amendment No. 8 to the Technical Specifications - Operating License DPR-43.

This submittal consists of the addition of Sections 3.12 and 4.12, Control Room Post Accident Recirculation System, as requested in AEC's letter, Mr. R. A. Purple to Mr. E. W. James dated December 6, 1974.

We have included as a technical specification requirement the control room post accident filtration system. Including this system sets a precedent of including non-engineered safeguards systems in the technical specification. Furthermore the laboratory test results being imposed go beyond the original design requirements of the system. We consider this an upgrading of the system with no justification on the part of the Commission.

This system is a standby system to be used only in the event of an accident which could require possible control room abandonment. Therefore our requirement to operate the system for one (1) hour every month rather than ten (10) hours is adequate to demonstrate operability and at the same time does not unnecessarily contaminate the filters with foreign matter. Contamination would necessitate more frequent testing or replacement of these expensive filters.

We have also removed the laboratory test results from the "limiting conditions of operation" and included them under Section 4.12, Surveillance requirements. We do not agree that laboratory test results should be a limiting condition of operation.

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We did not include other filter systems which are in the plant. These systems were not considered in the safety analysis and we have not taken any credit for their existence and therefore believe their operability should not be a limiting condition for operation. These filter systems will be tested in accordance with the present requirements of Table TS 4.1-3, Item 6.

Very truly yours,



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

EWJ:jm

Subscribed and Sworn to
Before Me This 14th Day
of February 1975


Notary Public, State of Wisconsin

My Commission Expires

October 6, 1976

3.12 CONTROL ROOM POST ACCIDENT RECIRCULATION SYSTEM

Regulatory Docket File

APPLICABILITY

Approved by Ltr Dated 2-14-75

Applies to the operability of the Control Room Post Accident Recirculation System.

OBJECTIVE

To specify operability requirements for the Control Room Post Accident Recirculation System.

SPECIFICATIONS

- a. The reactor shall not be made critical unless both trains of the control room post accident recirculation system are operable.
- b. During power operation or recovery from inadvertent trip, the following condition of inoperability may exist during the time interval specified. The reactor shall be placed in hot standby condition if operability is not restored within the time specified.
 1. One train may be inoperable for a period not exceeding 7 days provided the other train is demonstrated to be operable.
 2. Any component common to both trains may be inoperable for a period of 72 hours.

BASIS

3.12 CONTROL ROOM POST ACCIDENT RECIRCULATION SYSTEM

The control room post accident recirculation system is designed to filter the control room atmosphere during control room isolation conditions. The control room post accident recirculation system is

designed to automatically start upon SIS or high radiation signal at inlet of unit and to maintain the control room pressure to the design positive pressure so that all leakage should be out leakage.

If the system is found to be inoperable, there is no immediate threat to the control room and reactor operation may continue for a limited period of time while repairs are being made. If the system cannot be repaired within seven days, the reactor is placed in hot standby until the repairs are made.

TS 3.12-2

Change No. 10
Amendment 8
February 14, 1975

4.12 CONTROL ROOM POST ACCIDENT RECIRCULATION SYSTEM

APPLICABILITY

Applies to the periodic test requirements for the control room post accident recirculation system.

OBJECTIVE

To ensure that the control room post accident recirculation system is performing within the limited conditions of operation.

SPECIFICATIONS

- a. At each major refueling outage, the pressure drop across the combined HEPA filters and charcoal adsorber banks shall be demonstrated to be less than 6 inches of water at system design flow rate.
- b. The tests and sample analysis indicated below shall be performed initially and at least once per year for standby service or after every 720 hours of system operation and following significant painting, fire or chemical release in any ventilation zone communicating with the system.
 1. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal adsorber banks shall show \geq 99% DOP removal and \geq 97% halogenated hydrocarbon removal.
 2. Fans shall be shown to operate within \pm 10% design flow.

- c. One charcoal filter element or sample shall be removed after each five years of service and laboratory tested to demonstrate the requirements stated below.
 1. The results of laboratory carbon sample analysis shall show $\geq 90\%$ radioactive methyl iodide removal at a velocity within 20% of system design, 0.05 to 0.15 mg/m³ inlet iodide concentration, $\geq 95\%$ R.H. and $\geq 125^{\circ}\text{F}$.
- d. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the filter housing.
- e. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the filter housing.
- f. Each train shall be operated at least one hour every month.
- g. At each major refueling outage automatic initiation of the control room post accident recirculation system shall be demonstrated.

BASIS

4.12 CONTROL ROOM POST ACCIDENT RECIRCULATION SYSTEM

Pressure drop across the combined HEPA filters and charcoal adsorbers of less than 6 inches of water at the system design flow rate will indicate that the filters and adsorbers are not clogged by excessive amounts of foreign matter. Pressure drop should be determined at each major refueling outage to show system performance capability.

High efficiency particulate absolute (HEPA) filters are installed before the charcoal adsorbers to prevent clogging of the iodine adsorbers. The charcoal adsorbers are installed to reduce the potential intake of radioiodine to the control room.

The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated.

Tests of the charcoal adsorbers with halogenated hydrocarbon shall be performed in accordance with USAEC Report - 1082. Iodine removal efficiency tests shall follow RDT Standard M-16-1T.

The in-place test results should indicate a system leak tightness of less than 1 percent bypass leakage for the charcoal adsorbers and a HEPA efficiency of at least 99 percent removal of DOP particulates. The laboratory carbon sample test results should indicate a radioactive methyl iodide removal efficiency of at least 90 percent for expected accident conditions. If the efficiencies of the HEPA filters and charcoal adsorbers are as specified, the resulting doses will not exceed the allowable levels stated in Criterion 19 of the General Design Criteria for Nuclear Power Plants, Appendix A to 10 CFR Part 50.

The charcoal adsorber efficiency test procedures should allow for the removal of one adsorber tray, emptying of one bed from the tray, mixing the adsorbent thoroughly and obtaining at least two samples.

TS 4.12-3

Change No. 10
Amendment 8
February 14, 1975

Each sample should be at least two inches in diameter and a length equal to the thickness of the bed. If test results are unacceptable, all adsorbent in the system shall be replaced with an adsorbent qualified according to Table 1 of Regulatory Guide 1.52 (June 1973). The replacement tray for the adsorber tray removed for the test should meet the same adsorbent quality. Tests of the HEPA filters with DOP aerosol shall be performed in accordance to ANSI N101.1-1972. Any HEPA filters found defective shall be replaced with filters qualified pursuant to Regulatory Position C.3.d of Regulatory Guide 1.52.

Operation of the fans significantly different from the design flow will change the removal efficiency of the HEPA filters and charcoal adsorbers.

Operation of the system for one hour every month will demonstrate operability of the filters and adsorber system.

If significant painting, fire or chemical release occurs such that the HEPA filter or charcoal adsorber could become contaminated from the fumes, chemicals or foreign materials, the same tests and sample analysis shall be performed as required for operational use.

Demonstration of the automatic initiation capability is necessary to assure system performance capability.