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RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. OPERATING REACTORS BRANCH 1

SUBJECT: FORWARDS PROPOSED AMEND 38 TO TECH SPECS REQUESTING THAT TURBINE STOP & GOVERNOR VALVE CLOSURE TESTS BE WAIVED.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

April 16, 1979

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

Attention Mr. A. Schwencer, Chief
Operations Reactors Branch #1
Division of Operating Reactors

Gentlemen:

REGULATORY DOCKET FILE COPY

Docket 50-305
Operating License DPR-43
Proposed Technical Specification Amendment No. 38
Kewaunee Nuclear Power Plant

Enclosed please find forty (40) copies of proposed Amendment No. 38 to the Kewaunee Nuclear Power Plant Technical Specifications in accordance with 10 CFR 170.22, we find this amendment to be a Class III amendment and have enclosed a check for $4,000.00 to cover the fee associated with processing this amendment.

The attached amendment requests that the Turbine Stop and Governor Valve closure tests be waived for end of life operations. In order to perform the tests, power must be reduced to less than 30%. This imposes operational problems trying to keep the axial flux difference within Technical Specification target band limitations when low reactor coolant system boron concentrations are present, resulting in a potential restriction of 50% power for 24 hours. The low boron concentration also results in the processing of large amounts of reactor coolant system water in order to raise power back up to full power and to overcome xenon peaking from the power reduction.

There have been more than sixty reactor and turbine trips at Kewaunee Nuclear Power Plant since January of 1974, and the turbine stop and governor valves have always operated properly. In addition to these actual trips, the turbine stop and governor valves have received well in excess of 100 trip signals during preliminary checkouts, formal testing of the pre-operational and start-up testing programs, power operation and pre-start checks without failure.

The satisfactory operation of the turbine governor and stop valves has been demonstrated in more than 40 monthly tests in the past four years. In addition to the turbine governor and stop valves, another mechanism for terminating steam flow to the turbine is main steam isolation valves, which are also preiodically tested. Because of the reliability of the E-H control system and the design of the steam supply system to the turbine, this Tech. Spec. change will not affect the health and safety of the public, or the safe operation of the plant.

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This technical specification change is similar to the temporary change to the technical specifications granted by Amendment 4, January 20, 1975. Amendment 4 extended the surveillance period for this test by an additional 59 days. Near the end of cycle, when the boron concentration is at or below 150 ppm, boron letdown is approximately 3 ppm per day. Hence, this proposed amendment would extend the surveillance period from one month to about two months. The evaluation by the AEC staff for Amendment 4 is included for your reference.

Sincerely,

E.R. Mathews

E. R. Mathews
Vice President
Power Supply & Engineering

dl

Enc.

Subscribed and Sworn to
Before Me This 16th Day
of April, 1979

Notary Public, State of Wisconsin

My Commission Expires
Dec. 19, 1982

MINIMUM FREQUENCIES FOR EQUIPMENT TESTS

	Equipment Tests***	Test	Frequency	Maximum Time Between Tests (Days)
1.	Control Rods	Rod drop times of all full length rods	Each refueling outage	N.A.
		Partial movement of all rods	Every 2 weeks	17
1a.	Reactor Trip Breakers	Open trip	Monthly	37
1b.	Reactor Coolant Pump Breakers-Open-Reactor Trip	Operability	Each refueling outage	N.A.
2.	Pressurizer Safety Valves	Set point	One each refueling outage	N.A.
3.	Main Steam Safety Valves	Set point	Two each refueling outage	N.A.
4.	Containment Isolation Trip	Operability	Each refueling outage	N.A.
5.	Refueling System Interlocks	Operability	Prior to each refueling outage	N.A.
6.	Ventilation System	Halide, DOP and Methyl Iodide Pressure Drop Test Visual Inspection	During each refueling outage except as specified in Note**	N.A.
	a. Shield Building b. Auxiliary Building SV Zone c. Spent Fuel Pool			12
7.	Fire Protection Pump and Power Supply	*Operability	Monthly	37
8.	Containment Leak Detect	Operability	Weekly	8
9.	Diesel Fuel Supply	*Fuel inventory	Weekly	8
10.	Turbine Stop and Governor Valves	Operability	Monthly (1)	37(1)
11.	Fuel Assemblies	Visual Inspection	Each refueling outage	N.A.
12.	Guard Pipes	Visual Inspection	Each refueling outage	N.A.

Notes

* See Specification 4.1.d

** Tests and frequency shall be in accordance with Specifications 4.4.d and 4.12.

*** Following maintenance on the above equipment that could affect the operation of the equipment tests should be performed to verify operability.

(1) This test may be waived for end of cycle operations when boron concentrations are less than 150 ppm, due to operational limitations. 38