

NRC DISTRIBUTION FOR POINT 50 DOCKET MATERIAL

TO: USNRC

FROM: WISCONSIN PUBLIC SVC CORP.
GREEN BAY, WISCONSIN
E.W. JAMES

FILE NUMBER
DATE OF DOCUMENT 4/15/77
DATE RECEIVED 4/18/77
NUMBER OF COPIES RECEIVED

LETTER
 ORIGINAL
 COPY

NOTORIZED
 UNCLASSIFIED

PROP INPUT FORM

3 signed 37 CC

DESCRIPTION
LTR. NOTARIZED 4/15/77... LTR. RE. THEIR 11/30/
76 LTR...TRANS THE FOLLOWING.....

DO NOT REMOVE (1P)

PLANT NAME: KEWAUNEE

SAB

ENCLOSURE
PROPOSED AMDT # 25 TO THE TECH. SPECS ADDRESS-
ING THE REVISION OF THE IN-SERVICE INSPECTION RE-
QUIREMENTS OF SECTION XI OF THE ASME BOILER
AND PRESSURE VESSEL CODE AND APP:ICABLE ADDENDA
.....
(3P)

40 CYS ENCL Rec'd

ACKNOWLEDGED

SAFETY	REG ACTION/INFORMATION	ENVIRO
ASSIGNED AD:		ASSIGNED AD:
BRANCH CHIEF: (6) Schwenger		BRANCH CHIEF:
PROJECT MANAGER: Neighbors		PROJECT MANAGER:
LIC. ASST.: Sheppard		LIC. ASST.:

INTERNAL DISTRIBUTION			
<input checked="" type="checkbox"/> REG FILE	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY &
<input checked="" type="checkbox"/> NRC PDR	HEINEMAN	TEDESCO	ENVIRO ANALYSIS
<input checked="" type="checkbox"/> I & E (4)	SCHROEDER	BENAROYA	DENTON & MULLER
<input checked="" type="checkbox"/> OELD		LAINAS	
GOSSICK & STAFF	ENGINEERING	IPPOLITO	ENVIRO TECH.
MIPC	MACARRY	KIRKWOOD	ERNST
CASE	BOSHAY		BALLARD
HANAUER	SIHWEL	OPERATING REACTORS	SPANGLER
HARLESS	PAWLICKI	STELLO	
			SITE TECH.
PROJECT MANAGEMENT	REACTOR SAFETY	OPERATING TECH.	GAMMILL
BOYD	ROSS	EISENHUT	STEPP
P. COLLINS	NOVAK	SHAO	HULMAN
HOUSTON	ROSZTOCZY	BAER	
PETERSON	CHECK	BUTLER	SITE ANALYSIS
MELTZ		GRIMES	VOLLMER
HELTEMES	AT & I		BUNCH
SKOVHOLT	SALTZMAN		<input checked="" type="checkbox"/> J. COLLINS
	RUTBERG		KREGER

EXTERNAL DISTRIBUTION			CONTROL NUMBER
<input checked="" type="checkbox"/> LPDR: Kew Aunee	NAT. LAB:	BROOKHAVEN NAT. LAB.	771090312 Ap 2 67
<input checked="" type="checkbox"/> TIC:	REG V. IE	ULRIKSON (ORNL)	
<input checked="" type="checkbox"/> NSIC:	IA PDR		
<input checked="" type="checkbox"/> ASLB:	CONSULTANTS:		
<input checked="" type="checkbox"/> ACRS 16 CYS HOLDING SENT	CAT B		

WISCONSIN PUBLIC SERVICE CORPORATION



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

REGULATORY DOCKET FILE COPY

April 15, 1977

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



Gentlemen:

REF: Docket 50-305
Operating License DPR-43
Letter to Wisconsin Public Service Corporation
from Mr. A. Schwencer, Chief, Operating Reactors
Branch #1 dated November 30, 1976

The referenced letter requested that we submit proposed Technical Specification changes relative to 10CFR50.55a(g) at least six months prior to the next 40 month inspection period for the Kewaunee Plant.

Please find forty copies of Proposed Amendment No. 25 to the Kewaunee Nuclear Power Plant Technical Specifications. This proposed amendment addresses the revision of the in-service inspection requirements for the Kewaunee Plant to the requirements of Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as specified by 10CFR50.55a(g).

Specific requests for relief from the ASME Code requirements as allowed by 10CFR50.55a(g)(6)(i) will be provided by July 18, 1977, which is 90 days prior to the start of our next inspection interval.

Very truly yours,

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

EWJ:sna
Attach.
Subscribed and Sworn to
Before Me This 15TH Day
of April 1977
Joseph G. Lewis
Notary Public, State of Wisconsin
My Commission Expires
February 11, 1979

4.2 REACTOR COOLANT SYSTEM IN-SERVICE INSPECTION

Applicability

Applies to in-service structural surveillance of the reactor coolant system boundary and functional testing of safety related pumps and valves associated with the reactor coolant system.

Objective

To assure the continued integrity of the reactor coolant system boundary and performance of safety related mechanical equipment associated with the reactor coolant system.

Specification

- 4.2.1 Inservice inspection of ASME Code Class 1, Class 2 and Class 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10CFR50, Section 50.55a(g), except where such inspections are documented as being impractical and specific relief has been requested of the NRC pursuant to 10CFR50 Section 50.55a(g)(6)(i). Following formal response by the NRC to the relief request the inspection shall be in accordance with the relief as granted.
- 4.2.2 Inservice testing of ASME Code Class 1, Class 2 and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10CFR50 Section 50.55a(g), except where nuclear safety would be compromised by such tests, specific Technical Specification requirements address performance testing of such equipment, or specific exemption has been requested of the NRC pursuant to 10CFR50 Section 50.55a(g)(6)(i) Following formal response by the NRC to the relief request the testing shall be in accordance with the relief as granted.

Basis

The inspection program will be in accordance with the requirements of Section XI of ASME Code and applicable Addenda per the requirements of 10CFR50 Section 50.55a(g). The Examination requirements will be met to the extent practical through limitations on component configuration, accessibility and material composition.

The plant was not specifically designed to meet all the requirements of Section XI of the code; therefore, 100 percent compliance may not be feasible or practical. However, access for in-service inspection was considered during the design, and modifications have been made where practical to make provision for maximum access within the limits of the current plant design.

The Reactor Coolant System was initially free of gross defects, and the system has been designed such that gross faults or defects should not occur throughout the plant lifetime. The ten-year surveillance program will reveal possible fault areas before any leak develops, should such problems actually occur.

The inservice testing requirements of Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda were developed following commercial operation of the Kewaunee Plant. The Technical Specifications address specific testing requirements for safety related equipment including pumps and valves, which were evaluated to be adequate by the NRC in granting the Operating License. The ASME Code does not take precedence over these established surveillance requirements of the Specifications and the methodology of those Technical Specification required tests.

Additional tests of equipment require to be listed by Section XI and applicable Addenda and not addressed in the Technical Specification shall not compromise

nuclear safety. Specific exemption will be provided by the NRC for those component tests which are impractical, compromise safety, or whose performance would require modification of the facility which degrades overall safety or is not cost-effective in light of 10CFR50 Section 50.109(g) considerations.