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 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service
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APR/4

SUBJECT: Requests relief from 810101 installation date for TMI mods re safety grade pressure & water level containments & auxiliary feedwater due to supply shipment delays. Shift manning program description to be submitted by end of 1980.

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WISCONSIN PUBLIC SERVICE CORPORATION



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

October 27, 1980

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
TMI Action Plan Requirements: Containment Pressure,
Containment Water Level and Auxiliary Feedwater
Flow Indication, and Shift Manning

Your letter of September 5, 1980, extended some of the deadlines for TMI modifications, but reiterated the requirement that safety grade containment pressure, containment water level, and auxiliary feedwater flow indications be installed by January 1, 1981 (Items II.F.1.4, II.F.1.5 and II.E.1.2.2 in Enclosure 1 of the 9/5/80 letter). You also requested that licensees should formally notify the staff as soon as implementation delays become apparent. This letter serves to inform you of delays in the implementation dates for these items, and seeks relief from those dates. Each specific item is discussed below.

Secondary, your letter of July 31, 1980, promulgated certain requirements with respect to shift manning which were to be responded to by November 1, 1980, and completed by July of 1982. We are formulating a program which is based upon staffing requirements. This is to inform you that we will describe that program in detail in a letter at the end of this year which will address all of the applicable items noted in Enclosure 1 of your letter dated September 5, 1980.

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Item II.F.1.4 Containment Pressure Indication:

We have recently been informed that the date of shipping for the pressure transmitters which will be used for our containment pressure indication will be October 24, 1980, delayed from the original date of October 1, 1980. The power supplies for these transmitters were ordered on July 15, 1980, with the original shipping date promised as December, 1980. That shipping date has now slipped to February, 1981. Based on these dates, we will be unable to install the containment pressure transmitter by January 1, 1981, as specified in your September 5, 1980, letter.

We propose to install this equipment during our next refueling outage, which is scheduled to commence in April of 1981. We feel that this is justified based on the fact that we have acted in good faith in trying to achieve the January 1, 1981, requirement, and that we have existing redundant, safety grade containment pressure instrumentation.

Item II.F.1.5 Containment Water Level Monitor:

The transmitters necessary to monitor containment water level were originally scheduled to be shipped on December 1, 1980. This date has now slipped to January 31, 1981. Because of this date, we will be unable to implement the requirement to provide wide range containment water level indication by January 1, 1981. All other material is scheduled to be on site prior to January 31, 1981.

The installation of this system will require a hot shutdown of six days. We feel that our current containment sump level indication provides adequate information to the operator in the interim, therefore, we are proposing to install the wide range level indication during the refueling outage scheduled to commence in April of 1981.

Item II.E.1.2.2 Safety Grade Auxiliary Feedwater Flow Indication

Your letter of September 5, 1980, contained the requirement that auxiliary feedwater flow indication be upgraded to safety grade by January 1, 1981. While we will have received the safety grade transmitters, we will not have safety grade power supplies until February, 1981. However, we do have existing transmitters powered from the non-interruptible instrument power bus, which is powered from a battery-backed power supply. Since the non-interruptible instrument bus is a highly reliable supply, we feel that this implementation meets the intent of your September 5, 1980, letter. The modification to add safety grade supply power will be completed prior to or during the 1981 refueling outage which is scheduled to begin in April of 1981.

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We request your concurrence with our proposed implementation schedules for these items. We feel that existing instrumentation provides adequate information to the operator, such that the health and safety of the public is not jeopardized by the continued operation of the Kewaunee Plant until the April, 1981, outage. We feel we have acted expediently in design and procurement of these items along with the many other TMI modifications, and that the proposed implementation date of April, 1981, is reasonable.

Very truly yours,

Carl W. Giesler
for

E. R. Mathews, Vice President
Power Supply & Engineering

snf

cc - Mr. Robert Nelson, NRC Resident Inspector
RR #1, Box 999, Kewaunee, WI 54216