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ACCESSION NBR: 8102250404 DOC. DATE: 81/02/20 NOTARIZED: YES DOCKET #
 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305
 AUTH. NAME: MATHEWS, E.R. AUTHOR AFFILIATION: Wisconsin Public Service Corp.
 RECIP. NAME: SCHEWENCER, A. RECIPIENT AFFILIATION: Operating Reactors Branch 1

SUBJECT: Submits proposed Amend 45 to Tech Specs, modifying existing Tech Specs & deleting ETS.

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February 20, 1981

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

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment No. 45

Please find enclosed forty (40) copies of our Proposed Amendment No. 45 to the Kewaunee Nuclear Power Plant Technical Specifications. Included are the specific technical specifications to be changed or added and the basis for doing so. Changes range from minor rewording to complete deletion. The requested modifications are presented below in the order they appear in the Technical Specifications.

T.S. 2.3.a.1.B

It is requested that intermediate range nuclear flux setpoint be raised to 40 percent. The Kewaunee Plant has experienced unnecessary trips due to the present setpoint of 25 percent.

Following a refueling operation or after source range/intermediate range detectors are replaced, the setpoint is reduced to 70 percent of its previous value for conservatism. This conservatism is required since the detectors cannot be calibrated to reactor power until after startup.

During a power increase the P-10 permissive allows the operator to block the intermediate range trip at 10 percent power. During a power reduction, the P-10 permissive automatically unblocks the intermediate range trip at 7.5 percent power.

However, the intermediate range trip signal does not reset until 50 percent of the trip setpoint. It, therefore, becomes possible, during a startup which requires a backdown in power for testing, to have P-10 unblock while a trip signal is still present. As a result, a reactor trip can occur.

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The recommended setpoint for the intermediate range high flux trip is \leq 40 percent instead of \leq 25 percent. The intermediate range trip is backup to the power range low setpoint of 25 percent and is not taken credit for in the safety analysis. Therefore, a change in the setpoint will not affect safe operation of the plant and will provide relief from inadvertent trips and the resultant plant transients.

T.S. 3.1.a.4

As requested in the letter from D. G. Eisenhut to all PWR licensees dated July 2, 1980, we concur with the staff on the importance of pressurizer heater availability and, therefore, propose that the following specification be added to the Kewaunee Technical Specifications:

3.1.a.4 Pressurizer Heaters

- A. At least one group of pressurizer heaters will have an emergency power supply available when the average RCS temperature is greater than 350°F.

This specification insertion requires modification of Table 4.1-3 and page numbers in Section T.S. 3.1.

T.S. 3.4.a.4

A conditional exception is requested to allow condensate storage tank level to drop below 75,000 gallons during a startup, for a period not to exceed 12 hours. During a startup when water usage is at a maximum, the level periodically will drop below 75,000 gallons. Since this mode of operation requires less water in storage to assure sufficient cooldown capability (i.e., less decay heat), the addition of a conditional exception is reasonable. In the unlikely event of a need for more water an unlimited supply is available from Lake Michigan through the service water system. Therefore, no reduction in safety is incurred by this change.

T.S. 3.5

Safety injection initiation is no longer dependent on a low pressurizer level signal (Amendment No. 29), however, the basis written in the Technical Specifications still refers to pressurizer level. We request that the basis be revised to indicate safety injection initiation from a pressurizer pressure signal. The basis shall now read as follows:

"Safety injection in response to a loss of coolant accident, is initiated upon receipt of low pressurizer pressure signals and, in the case of rapid RCS depressurization, by a high containment pressure signal."

T.S. 4.10

The following changes to the Technical Specifications, Section 4.10 and its associated tables are proposed:

1. Change Section 4.10.b to read:

"Reports shall be submitted in accordance with Section 6.9 of the Technical Specifications."

The present reference to Section 6.6.d is incorrect.

2. Delete the reference to ion chamber measurements in Section C.1 of Table 4.10-1.

These ion chambers were originally placed with the TLD's as a reference measurement. When the preoperational program was initiated, the environmental TLD was still in the development stage. Advances in the field of thermoluminescent dosimetry have now made the TLD a more reliable system. Discussions with Hazelton, our environmental contractor, indicate the data accuracy and percent recovery is much better with the TLD's than the ion chambers. In addition, our ion chambers are drifting and require replacement, but replacements are not obtainable due to obsolescence.

3. Delete Section N of Table 4.10-1.

This requirement entails collection of bottom organisms from Lake Michigan for radiological analysis. Due to the lack of bottom organisms in the lake, a sample sufficient in size to give dependable readings is not accessible.

Since bottom sediments are analyzed at the same collection points, we believe that the deletion of bottom organism collection and analysis will not reduce the effectiveness of the Operational Environmental Radiological Surveillance Program.

4. Change Table 4.10-2, Location K-6 to "Farm - 6.7 miles WSW of site."

The original farm for milk sampling was dissolved and a new location needed to be established.

Appendix B

We believe that the environmental technical specifications (ETS) (Appendix B to the Kewaunee Plant's Technical Specifications) are not within the purview of the Nuclear Regulatory Commission and, therefore, are not required to be in the Technical Specifications. The objective of the ETS, which is to assure that the Kewaunee Plant does not adversely affect the environment, is still assured since

the State of Wisconsin now has the authority to specify and permit releases from the plant. Since the facets of the ETS are reported to the state on an annual basis, deleting the ETS will reduce the duplication of efforts with respect to reporting requirements while not reducing the program effectiveness. The following discussion addresses each of the ETS:

ETS 2.1.1 Maximum ΔT Across the Condenser.

The State of Wisconsin has the authority to regulate this parameter pursuant to Section 402(b) of the Public Law 92-500 (Attachment #1).

ETS 2.1.2 Maximum Discharge Temperature
and
ETS 2.1.3 Rate of Change of Condenser Cooling Water

The State of Wisconsin is the regulating authority for this parameter. The State does not require a limit on discharge temperatures or rate of change of condenser cooling water under WPDES Permit WI 0001571. This permit is included as Attachment #2.

ETS 2.2.1 Chlorination of Circulating Water System
and
ETS 2.2.2 Suspended and Dissolved Solids

The State of Wisconsin has the regulating authority under WPDES permit.

ETS 2.2.3 Treatment Chemicals

The State of Wisconsin does not require identification of treatment chemicals used, but does require notification if any maximum effluent limitation is exceeded.

ETS 4.1.1 Aquatic - Fish Impingement

The State of Wisconsin has determined that the location and operation of the Kewaunee Plant intake structure has a minimal impact on the resident fish population. This statement is included in a letter from Thomas A. Kroehn to Mr. E. W. James dated August 24, 1977, and is included as Attachment #3.

ETS 4.2.2 De-icing Operation

The State of Wisconsin requires documentation of all periods of de-icing, therefore, this specification is a duplication of effort.

We request prompt review action on this proposed amendment so that unnecessary duplication of effort can be eliminated.

U. S. Nuclear Regulatory Commission
February 20, 1981
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In accordance with 10 CFR 170.22, we find this amendment to be a Class IV amendment since it involves several changes of the Class III type; therefore, we have enclosed a check for \$12,300 to cover the fee associated with processing this amendment.

Sincerely,

E. R. Mathews

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

snf

Enc.

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

Subscribed and Sworn to
Before Me This 20th Day
of February 1981

[Signature]

Notary Public, State of Wisconsin

My Commission Expires

Nov. 19, 1982
