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VARGA, S.A. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests expedited review of Proposed Amend 40a for License DPR=43, submitted 800416, re removal of requirement for foam

suppression sys.

NOTES: I&E: 3 copies all material.

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ACTION:	RECIPIENT ID CODE/NAME VARGA,S. 04		COPIES LTTR ENCL 7		RECIPIENT ID CODE/NAME		COPIES LTTR ENCL	
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WISCONSIN PUBLIC SERVICE CORPORATION



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

February 25, 1981

Mr. Steven A. Varga, Chief Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Varga:

Docket 50-305 Operating License DPR-43 Kewaunee Nuclear Power Plant Fire Protection Modifications



Appendix R to 10 CFR 50 promulgated a new requirement in regard to fire protection mandating installation of oil collection systems on reactor coolant pumps. We intend to install oil collection systems on the reactor coolant pumps at the Kewaunee Nuclear Power Plant during the scheduled 1982 refueling outage.

Presently a Foam Suppression System is installed in the RCP compartments. Installation of this system was required through Amendment No. 23 to the Facility Operating License which states in paragraph 2.C.3 that "The Licensee . . . is required to complete the modifications identified in paragraphs 3.1.1 through 3.1.28 of the Fire Protection Safety Evaluation Report." Paragraph 3.1.3 of this report specifically identifies the Reactor Coolant Pump Foam Suppression System as one of the referenced modifications.

Due to the limited space available in the RCP compartments, there is insufficient room for the oil collection system and the suppression systems. Therefore, the Foam Suppression System must be removed prior to installation of the oil collection system. To prevent this task from becoming a critical path item during 1982 refueling outage, we are planning to remove the Foam Suppression System during the 1981 outage which begins April 19. In order to accomplish this, relief from the Foam Suppression System requirement noted above will have to be granted.

The Foam Suppression System was installed due to economic concerns, and is not necessary for fire-related safe shutdown of the reactor. This was reported in the Wisconsin Public Service Corporation Fire Protection Analysis, which

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indicated that the ability to perform safe fire-related shutdown would be maintained without the Foam Suppression System in the RCP compartments.

Our Proposed Amendment No. 40a which was submitted by letter dated April 16, 1980, requested, among other things, that paragraph 2.C.3 of the Kewaunee Plant Operating License, DPR-43, be deleted. Deletion of this paragraph would remove the requirement for installation of the Foam Suppression System as a condition of license, thus allowing us to proceed with our plans for installation of an oil collection system. We request an expedited review of Proposed Amendment No. 40a, especially removal of the requirement for the Foam Suppression System.

To facilitate scheduling of work during this year's refueling outage, we would appreciate your response to this request as soon as possible, but no later than March 31, 1981.

Very truly yours,

E. Mathewar

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

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