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 EISENHUT, D. G. Division of Licensing

SUBJECT: Forwards proposed revisions to Tech Specs re TMI-2 Lessons Learned, Category A requirements. Properly executed application for license amend will be submitted 811020.

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WISCONSIN PUBLIC SERVICE CORPORATION



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

October 13, 1981

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-2 Lessons Learned, Category "A" Technical Specifications

- References:
- 1) Letter from D. G. Eisenhut to all Pressurized Water Reactor Licensees dated July 2, 1980
 - 2) Letter from E. R. Mathews to D. G. Eisenhut dated December 23, 1980
 - 3) Letter from E. R. Mathews to A. Schwencer dated February 20, 1981 transmitting Proposed Amendment 45

In reference 1, the NRC requested that all Pressurized Water Reactor Licensees propose Technical Specifications regarding the TMI-2 Lessons Learned Category "A" items. Wisconsin Public Service Corporation (WPSC) responded on December 23, 1980 (reference 2). With the exception of one casual comment during a telephone conversation between WPSC's Nuclear Licensing and Systems Supervisor and the NRC Project Manager, WPS received no response to our letter of December 23, 1980 until a telephone call from the NRC staff on September 25, 1981. During that call we agreed to propose additional technical specifications in this regard. We note that we still have not received a formal response to our letter of December 23, 1980; furthermore, the technical discussion contained in that letter remains unchallenged.

During the telephone conversation between the NRC staff and WPSC on September 25, 1981, we agreed to review model Technical Specifications proposed by the staff and respond with KNPP specific proposed technical specifications. The attachment to this letter provides proposed technical specifications in this regard. These

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proposed technical specifications are based on our review of the model technical specifications provided by the NRC Staff, Mr. Eisenhower's letter of July 2, 1980, and the proposed "Category A" technical specifications of a PWR of similar design. Due to the short time available to prepare this response, we are providing a single copy of our proposed technical specifications at this time. On October 20, 1981, we will submit a properly executed application for a License Amendment in accordance with the requirements of 10 CFR 50. The remainder of this letter discusses in detail the proposed technical specifications and the exceptions taken to Mr. Eisenhower's letter of July 2, 1980.

1. Emergency Power Supply Requirements

In Technical Specifications 3.1.a.5, we are proposing a specification similar to the model technical specification on the operability of Pressurizer Power Operated Relief Valves and their Associated Block Valves. Additionally, in proposed amendment 45 (reference 3) we have provided technical specifications concerning the operability of the pressurizer heaters.

We have taken exception to technical specifications on the allowable range at pressurizer level during steady state power operation. The upper limit of 95% proposed by the staff is superfluous since the reactor protection system will trip the reactor at 90% pressurizer level (required by Technical Specifications 2.3.a.2).

The lower limit proposed in the model technical specification is 10% level. However, to protect the pressurizer heater, they are turned off (and letdown is isolated) at 18.3% pressurizer level. If level did reach 10% during steady state operation, in all probability pressurizer pressure would drop to the reactor trip setpoint. Therefore, this specification would not provide any additional margin of safety, and we have not included it.

2. Valve Position Indicator, and

3. Instrumentation for Inadequate Core Cooling

We have proposed a new Table TS 3.5-5, a new specification 3.5e and a revision to Table TS 4.1-1 to require that certain instrumentation be operable. We believe these proposed changes meet your requirements in this regard.

4. Containment Isolation

We have proposed revisions to Tables TS 3.5-1 and TS 3.5-4 to include the instrument channels required for containment ventilation isolation. We are not proposing that a Table of all containment isolation valves be included in the technical specifications because:

- A. Technical Specifications 3.6, 1.g, 3.5 and 4.4 provide assurance that the containment isolation function as assumed in the Final Safety Analysis Report will be maintained as necessary; and
- B. Our proposed Amendment 23, which concerns Appendix J to 10 CFR 50, provides additional containment isolation technical specifications. Proposing new specifications now could lead to redundant and possibly confusing technical specifications, which is not in the interest of safety.

5. Auxiliary Feedwater System

We are proposing revision to Tables TS 3.5-1 and TS 3.5-3 and proposing a new Table TS 3.5-5 which we believe satisfy your requirements in this regard.

6. Shift Technical Advisor

We are proposing specifications 6.2.2.h and 6.3.2 which we believe satisfy your requirements in this regard.

7. System Integrity Measurement Program

We believe that a license condition specifying a System Integrity Measurement Program will not provide any additional margin of safety to plant personnel or the health and safety of the public, and, therefore, this condition should not be required. WPSC is committed to maintaining personnel exposures as low as reasonably achievable (ALARA). This implicitly necessitates a good system integrity program. Additional assurance of system integrity is provided through the requirements of 10 CFR 50.55, Inservice Inspection.

The WPSC commitment to ALARA is exemplified in our personnel exposure record, which is among the lowest in the country. For these reasons a license condition requiring a system integrity measurement program is unwarranted.

8. Improved Iodine Measurements Capability

We believe that a license condition on Improved Iodine Measurements Capability is not warranted. Section 2.C of our License subjects us to the conditions of 10 CFR 20. 10 CFR 20 requires complete surveys, records, restrictions, and evaluations of potential exposures to concentrations of any radioactive material. Our present Technical Specifications commit us to ANSI standards relative to the training and qualifications of personnel performing such surveys. We are routinely inspected by the NRC Office of Inspection and Enforcement, Region III, and specialized health physics inspectors to insure that we are in full compliance with all portions of 10 CFR 20, and our technical specifications. A license condition to specifically address "Iodine Monitoring" is clearly inappropriate as it would not provide any additional assurance beyond current requirements that the health and safety of plant personnel or the public is maintained.

9. Response Time Specifications

The Kewaunee Nuclear Power Plant was not designed to accommodate response time testing. Therefore, Technical Specifications addressing response time would be inappropriate. The KNPP technical specifications require comprehensive Engineered Safety Feature System tests (specifications 4.5 and 4.6). Observation of these tests provides assurance that the assumptions of the Safety Analysis remain valid.

Mr. Darrell G. Eisenhut
October 13, 1981
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10. Other Changes

On Table TS 4.1-1, page 3 of 4, a typographical error has been corrected. In item 24, the word "state" has been changed to "stage."

On Table 4.1-3, page 1 of 2, item 8, the description has been changed to clarify the function involved. "Containment Leak Detection" has been changed to "RCS Lead Detection."

On Table 4.1-1, page 4 of 4, the notation "R" has been defined to mean "each refueling cycle, not to exceed 18 months." The previous definition was "Each Refueling Shutdown."

In summary, we have developed proposed revisions to the Kewaunee Technical Specifications which we believe satisfy your requirements regarding TMI-2 Lessons Learned Category "A" items. In a few cases we have provided justification for those exceptions. The formal application for a license amendment incorporating these proposed revisions will be submitted October 20, 1981.

Very truly yours,

E. R. Mathews

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

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Enc.

cc - Mr. Robert Nelson, NRC Resident Inspector