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SUBJECT: Application for Amend 54 to License DPR-43, revising limiting conditions for operation, surveillance requirements & administrative controls.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

April 29, 1983

Dr. Harold R. Denton, Director
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
Proposed Amendment No. 54 to the KNPP Technical Specifications

- References:
- 1) Letter to E. W. James of WPSC from R. A. Purple of the NRC dated December 29, 1975
 - 2) Letter to A. Schwencer of the NRC from E. W. James of WPSC dated August 25, 1976
 - 3) Letter to E. W. James of WPSC from A. Schwencer of the NRC dated January 18, 1977
 - 4) Letter to E W James of WPSC from A Schwencer of the NRC dated January 21, 1977
 - 5) Letter to A Schwencer of the NRC from E W James of WPSC dated November 15, 1976
 - 6) Letter to E W James of WPSC from A Schwencer of the NRC dated January 18, 1975.

Enclosed please find 40 copies of Proposed Amendment No. 54 to the Kewaunee Nuclear Power Plant Technical Specifications. This proposed amendment revises items in the areas of Limiting Conditions for Operation, Surveillance Requirements and Administrative Controls.

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The following pages are affected:

TS v	Table TS 3.5-2 (2 and 3 of 3)	Table TS 4.1-2
TS vi	Table TS 3.14-1 (11 of 11)	Table TS 4.10-1 (2 of 6)
TS 3.4-1	Table TS 3.15-1	TS 6-1
TS 3.4-2	Table TS 3.15-2	TS 6-2
TS 3.5-6	TS 4.1-2a	TS 6-7
TS 3.5-7	TS 4.2-4	TS 6-24
TS 3.8-4	TS 4.4-5	TS 6-26
TS 3.10-6	Table TS 4.1-1 (3 of 4)	Figure TS 6.2-1

Section 3, Limiting Conditions for Operation, has been revised with respect to:

- a) clarifying the number of required main steam safety valves
- b) turbine overspeed protection
- c) the basis for refueling ventilation requirements
- d) rod misalignment limitations
- e) safety-related hydraulic shock suppressors
- f) fire detection instrumentation, and
- g) safety-related fire hose stations

Section 4, Surveillance Requirements, has been revised to:

- a) clarify the surveillance requirements for the Turbine Overspeed Protection System
- b) correct the definition of Category C-1 as it pertains to the results of steam generator tube inspections.
- c) correct the maximum leakrate specification for the Residual Heat Removal System
- d) clarify various sampling tests and their respective minimum testing frequencies, and
- e) update the location at which the precipitation sample is obtained for the Environmental Radiological Surveillance Program.

Section 6, Administrative Controls, has been amended to reflect:

- a) the on-shift Radiation Technologist
- b) the Radiation Protection Supervisors title change
- c) the recent reorganization of the Nuclear Power Department, and
- d) the final equipment environmental qualification rule (10CFR50.49)

The specific changes are identified below:

Pages TSv and TSvi

The table of contents and the list of tables for the technical specifications have been updated to reflect the proposed changes.

Page TS 3.4-1, Specification 3.4.a.1

This specification was revised to clarify the number of main steam safety valves required when the reactor coolant systems average temperature (T_{avg}) is above 350°F in order to eliminate an apparent contradiction with

TS 3.1.a.2. The latter specification requires one steam generator to be operable when T_{avg} is greater than 350°F and two to be operable when reactor power is above 10%. Each steam generator has five main steam safety valves that have a combined capability to relieve 50% of the maximum full-power steam flow. Therefore, ten steam system safety valves should only be required when both steam generators are required.

Page TS 3.4-2, Basis

The basis has been modified to clarify that five main steam safety valves will assure sufficient steam relief capacity below 10% power when only one steam generator is required to be operable.

Page TS 3.5-6, Basis

A new paragraph was added to the basis to clarify the requirements of Table TS 3.5-2 (Item 11) by describing the various turbine overspeed trip systems.

Page TS 3.5-7, Basis

A new page was added due to the carryover resulting from the change made above.

Page TS 3.8-4, Basis

The reference to the Auxiliary Building Special Ventilation System in the basis for the refueling ventilation requirements has been deleted. This reference was included in an NRC proposed amendment to the Kewaunee Technical Specifications (reference 1). During subsequent negotiations with the NRC the requirement was deleted from the proposed specification but the reference in the basis was not (reference 2). Therefore, it was inadvertently issued as part of NRC Approved Amendment No. 12 (reference 3).

Page TS 3.10-6, Specification 3.10.e.2

A sentence was added to the introductory paragraph of this specification clarifying that Rod Misalignment Limitations do not apply during physics testing. The time constraint for the determination of the core power peaking factors when a rod cluster control assembly (RCCA) is misaligned by more than ± 24 steps when reactor power is less than 85% but greater than 50% was also relaxed from 4 hours to 24 hours. This time limit for power levels below 85% is acceptable because of the increased margin in the peaking factors and the available shutdown margin obtained while operating at lower power levels. In addition, an action statement was added requiring the reactor power to be reduced to less than 50% if the rod is not realigned or the core power peaking factors are not determined within 24 hours. It should be noted that a misaligned RCCA is still subject to the conditions of TS 3.10.g (Inoperable Rod Limitations). The intent of this revision is to remove the ambiguity from the existing specification.

Table TS 3.5-2 (2 and 3 of 3)

Operational problems related to the Single channel Overspeed Trip System (SCOTS) had resulted in numerous, spurious turbine trips. WPSC has been installing a more reliable multi-channel, system referred to as the Redundant Overspeed Trip (ROST) System. Installation of the ROST system is scheduled to be completed by the end of the 1983 refueling/maintenance

outage, which is currently in progress. Table TS 3.5-2 has been modified to more accurately affect the turbine overspeed protection system.

Item 11, column 2, is revised to indicate that only one "channel", not 2, will trip the turbine. In addition, a footnote is added to the table to clarify that there are three independent systems that provide turbine overspeed protection, and that two of these systems are required to be operable. The not also allows blocking the respective systems for the purpose of testing. This is necessary since two of the systems are single channel, and failure to block them during a test would result in tripping the turbine. This revision only clarifies the technical specifications and does not substantively change them.

Table TS 3.14-1 (11 of 11)

A recently installed snubber in the Containment Spray System has been added to the list of safety-related hydraulic shock suppressors (CS-H-39).

Table TS 3.15-1

A typographical error has been corrected for the minimum number of required fire detection instruments in the fuel handling area.

Table TS 3.15-2

The safety-related fire hose stations have been renumbered to be consistent with the actual fire hose station numbers.

Page TS 4.1-2a, Basis

A new page was added to the basis to include a discussion of the surveillance requirements for the Turbine Overspeed Protection System.

Page TS 4.2-4, Specification 4.2.b

A typographical error was corrected in the definition of category C-1 for the results of a steam generator tube sample inspection.

Page TS 4.4-5, TS 4.4.c.2

A typographical error was corrected in the maximum leakrate specification for the Residual Heat Removal System.

Table TS 4.1-1 (3 of 4)

Item 28 has been expanded to clarify the surveillance requirements for the Turbine Overspeed Protection System. It itemizes the individual systems and their respective surveillance requirements.

Table TS 4.1-2

These changes, which clarify the various sampling tests and their respective minimum testing frequencies, were approved by NRC Amendment No. 13 (reference 4). However, they were accidentally deleted by Proposed Amendment No. 19 and NRC Amendment No. 18 (references 5 and 6).

Table TS 4.10-1 (2 of 6), Item E

The location at which the precipitation sample is obtained as a part of the Environmental Radiological Surveillance Program has been updated.

Page TS 6-1, Specification 6.2.2.a and 6.2.2.b

The on-shift Radiation Technologist has been added to the minimum on-duty shift complement and allowances for his replacement have been made should the need arise.

Page TS 6-2, Specification 6.2.2.e

This specification has been deleted due to the addition of an on-shift Radiation Technologist.

Page TS 6-2, Specification 6.3.1

This specification has been modified to reflect the title change of Health Physics Supervisor to the Radiation Protection Supervisor.

Page TS 6-7, Specification 6.5.2.4

A recent reorganization of the Nuclear Power Department required this change in accordance with TS 6.2.3.

Page TS 6-24, Specification 6.10.2.j

This specification is being changed as a result of the final rulemaking on the environmental qualification of electrical equipment important to safety (10CFR50.49).

Page TS 6-26, Specification 6.14

Same as Specification 6.10.2.j above.

Figure TS 6.2-1

Same as Specification 6.5.2.4 above.

We have determined that these changes are a Class II amendment since they are administrative in nature and have no safety significance. A check in the amount of \$1200. is enclosed in accordance with the requirements of 10CFR170.22.

Very truly yours,



C. W. Giesler
Vice President - Nuclear Power

js

Enc.

cc - Mr. Robert Nelson, US NRC
Mr. S. A. Varga, US NRC

Subscribed and Sworn to
Before Me This 29th Day
of April 1983


Notary Public, State of Wisconsin

My Commission Expires:
August 25, 1985