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 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to License DPR-43, revising Tech Specs re limiting conditions, surveillance requirements & administrative controls to comply w/updated inservice insp program.

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 TITLE: OR Submittal: Inservice Inspection/Testing

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WISCONSIN PUBLIC SERVICE CORPORATION


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

January 13, 1984

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.57 to the KNPP Technical Specifications

- References:
- 1) Letter from C.W. Giesler to D.G. Eisenhut dated December 6, 1983
 - 2) Letter from E.W. James to Director of NRR dated April 15, 1977
 - 3) Letter from E.W. James to Director of NRR dated July 18, 1977
 - 4) Letter from E.W. James to A. Schwencer dated February 9, 1979
 - 5) Letter from E.R. Mathews to A. Schwencer dated May 1, 1981
 - 6) Letter from E.R. Mathews to S.A. Varga dated May, 7, 1982
 - 7) Letter from C.W. Giesler to H.R. Denton dated December 20, 1982
 - 8) Letter from C.W. Giesler to H.R. Denton dated August 24, 1983
 - 9) Letter from S.A. Varga to C.W. Giesler dated April 19, 1983
 - 10) Letter from S.A. Varga to C.W. Giesler dated May 16, 1983

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Enclosed please find three signed and notarized originals and forty (40) copies of Proposed Amendment No. 57 to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications. This proposed amendment is being submitted in accordance with 10CFR50.55a(g)5(ii) which requires licensees to apply to the commission for a revision to the technical specifications if the revised inservice inspection program required by 10CFR50.55a(g)4(ii) conflicts with the facilities current technical specifications. In reference 1 we requested an extension for this submittal from December 16, 1983 to January 13, 1984 to enable a detailed WPS internal review of the plan prior to this technical specification submittal.

In references 2 through 6 we provided you with proposed Technical Specification Amendments which included a tabulation of all the inservice inspection requirements of the 1974 Edition of the ASME Code (Section XI) including all addenda through the Summer 1975. The bases for relief requests and alternate testing were also provided in the proposed technical specification amendment submittals.

In accordance with 10CFR50.55a(g)5(i) we have prepared an updated Inservice Inspection Plan. The next 120-month inspection interval starts June 16, 1984; therefore, in accordance with 10CFR50.55a(g)4(ii) we have updated the plan to address the requirements of the 1980 edition of the ASME Code (Section XI) including all addenda through the Winter 1981 Addenda. Where certain code requirements are determined to be impractical, relief requests will be submitted to the Commission in accordance with 10CFR50.55a(g)5(iii).

Since the submittal of reference 2 it has become apparent that the inclusion of the Inservice Inspection Plan in the technical specifications was inappropriate.

Minor updates to the plan and requests for relief generated during implementation of the plan have necessitated several revisions to the technical specifications during the past few years. The administration of these Technical Specification Amendments requires extensive WPS and NRC manpower and effort. We believe the testing required by the ISI and IST programs is beneficial and that it ensures the designed safety of the plant, however, the plan itself need not be included in the technical specifications.

As required by 10CFR50.55a(g)4(ii) these proposed technical specification amendments will revise current technical specifications to comply with our updated ISI program. The requirement to maintain an ISI program in accordance with 10CFR50.55a(g)4 and 10CFR50.55a(g)5 is still being met; however, the program itself is being removed from the technical specification for reasons delineated above. Several similar surveillance programs are required by technical specifications, however, the written programs are an independent entity (i.e. Radiation Protection Program, Equipment Qualification Program, Secondary Water Chemistry Program, etc.).

This proposed amendment revises items in the areas of Limiting Conditions for Operation, Surveillance Requirements, and Administrative Controls. The following pages are affected:

**TSii
**TS 3.3-3
TS 4.2-1
TS 4.2-2
TS 4.2-2A

TS 4.2-7
TS 4.2-8
TS 4.2-8A
*TS 4.5-2

*TS 4.5-3
TS 4.5-4
*TS 4.8-1
Table TS 4.1-3 -
(page 1 of 2)
Table TS 4.2-1 -
(pages 1 - 14)

*These pages are affected by Proposed Amendment No. 51 also.
**These pages are affected by Proposed Amendment No. 55 also.

A description of the specific changes, along with the appropriate significant hazards determination are identified in Enclosure I to this letter. The affected pages are attached in Enclosure II.


It is important to note that Proposed Amendment No. 51 and Proposed Amendment No. 55 (references 7 & 8) requested changes to some pages that are also affected by this proposed amendment. In an effort to alleviate the potential administrative errors in processing several outstanding proposed amendments that affect some of the same pages, we have assumed that amendments 51 and 55 will be approved as proposed. The affected pages included in Enclosure II provide the changes proposed by earlier submittals (Proposed Amendments 51 and 55) in addition to the proposed changes requested with this Proposed Amendment No. 57.

We have determined that these changes are a Class III amendment since it is a single issue which has acceptability clearly identified by an NRC position and are deemed not to involve a significant hazard consideration. A check in the amount of \$4,000.00 is enclosed in accordance with the requirements of 10CFR170.22.

This submittal is intended to supercede the Proposed Amendments submitted with references 2 through 6. The relief requests which were granted with references 9 and 10 will remain effective until June 16, 1984 at which time the new ISI and IST programs will be implemented. At that time (June 16, 1984) we request that the proposed technical specification changes submitted herein will also become effective.

In accordance with 10CFR50.55a(g)5(iii) and as discussed with our NRC Project Manager, we intend to submit the updated ISI and IST Plans (including request for relief) by April 1, 1984.

Very truly yours,

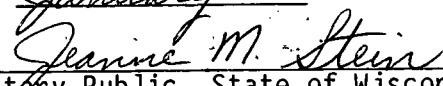

C.W. Giesler
Vice President - Nuclear Power

DSN/js

Enclosures

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

Subscribed and Sworn to
Before Me This 13th Day
of January 1984


Notary Public, State of Wisconsin

My Commission Expires:
June 28, 1987

Enclosure I to Letter from C.W. Giesler
to H.R. Denton

Dated January 13, 1984

Proposed Amendment No. 57 to the KNPP Technical Specifications

Description of Changes, Safety Evaluation,
and Significant Hazards Determination.

Proposed Amendment No. 57 to the KNPP Technical Specifications

The specific changes in this proposed amendment along with their safety evaluations and significant hazards determination are identified below.

Page TS ii

Description of Changes

The table of contents for the technical specifications has been updated to reflect the proposed changes.

Safety Evaluation

Since these changes are purely administrative in nature they do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10CFR50.92(c), we have determined that these changes do not represent a significant hazards concern.

Page TS 3.3-3

Description of Changes

The frequency of the Safety Injection System Valve Operation Surveillance Test was revised from monthly to quarterly to comply with the updated Inservice Testing (IST) program.

Safety Evaluation

The ASME Code Committee has revised the requirements in the ASME Boiler and Pressure Vessel Code (Section XI). The revision now requires quarterly testing of ASME Code Class 1, Class 2, and Class 3 pumps that are required to perform a specific function in shutting down a reactor or in mitigating the consequences of an accident and are provided

with an emergency power source. Consideration has been given to the negative effect of overtesting this equipment.

The ASME Code Committee is chartered with developing technically acceptable testing, repair and reporting requirements for use by the industry. Any changes to the code requires extensive review by technically qualified experts who participate on the various subcommittees. This process ensures that any changes to the requirements are technically justified.

In addition, 10CFR50.55a(b)2 endorses the 1980 Edition of the ASME Boiler and Pressure Vessel Code (Section XI) including the addenda through the Winter 1981 Addenda.

Based upon the extensive ASME Code Committee review and the endorsement provided in the Code of Federal Regulations we have determined that this change does not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10CFR50.92(c), we have determined that these changes do not represent a significant hazards concern.

Pages TS 4.2-1, TS 4.2-2 and TS 4.2-2A

Description of Changes

Specification 4.2.a has been retitled "ASME Code Class 1,2 and 3 Components and Supports." The section was reorganized such that the specification now

requires that an inspection and testing program be developed and implemented in accordance with the applicable ASME Code and Addenda as required by the Code of Federal Regulations. (In the case of this program the applicable version of the Code is the 1980 Edition including the Addenda through Winter 1981.) In addition, a reference to the testing and surveillance of shock suppressors (snubbers) in accordance with Technical Specifications 3.14 and 4.14 has been added to this section for completeness.

Safety Evaluation

The current specification contains requirements on record retention, length of inspection interval, examination scheduling and definitions which are detailed in Section XI of the ASME Code. By reorganizing the section such that reference is made to a program performed in accordance to the code, the intent of the technical specification has not changed.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10CFR50.92(c), we have determined that these changes do not represent a significant hazards concern.

Pages TS 4.2-7, 4.2-8 and 4.2-9

Description of Changes

The basis for Section 4.2 has been modified to reflect the changes discussed above.

Safety Evaluation

The same evaluations apply to these changes as found in the changes made in Section 4.2.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10CFR50.92(c), we have determined that these changes do not represent a significant hazards concern.

Pages TS 4.5-2, 4.5-3, 4.5-4 and 4.8-1

Description of Changes

The frequency of the test intervals were changed from monthly to quarterly to comply with the requirements for the updated testing program. The conditional requirement for pump testing following a plant shutdown has been clarified to require testing within one week "after the pumps are required to be operable" by the Technical Specifications."

Safety Evaluation

The same safety evaluations apply to these changes as those found in the changes made to Page TS 3.3-3.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10CFR50.92(c), we have determined that these changes do not represent a significant hazards concern.

Table TS 4.1-3 (page 1 of 2)

Description of Changes

Modified the table to delete the test frequency for the Pressurizer Safety Valves and the Main Steam Safety Valves. This testing will be done in accordance with the Inservice Testing Program.

Safety Evaluation

The testing will be performed as required by the ASME Code; therefore this change does not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10CFR50.92(c), we have determined that these changes do not represent a significant hazards concern.

Table 4.2-1 (pages 1 through 14)

Description of Changes

Table 4.2-1 was deleted in its entirety.

Safety Evaluation

The removal of the plan from the Technical Specifications was done for administrative reasons. The plan will become a separate entity of the program required by TS 4.2a. Since these changes are purely administrative in nature they do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10CFR50.92(c), we have determined that these changes do not represent a significant hazards concern.