

Enclosure I to the Letter from C. W. Giesler
to H. R. Denton
Dated March 30, 1984

Proposed Amendment No. 59 to the KNPP Technical Specifications

Response to Generic Letter 83-37
(NUREG-0737 Technical Specifications)

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Enclosure I

The TMI task action items included in Generic Letter 83-37 are detailed below including our method of implementing the proposed Technical Specification.

Reactor Coolant System Vents (II.B.1)

Sections 3.1.a.7 and 4.16 of the technical specifications have been added to meet the intent of the Standard Technical Specifications included as guidance in Generic Letter 83-37. The proposed technical specifications are written to reflect the plant specific system that is installed at the Kewaunee Plant.

Limiting Conditions for Operation and Surveillance requirements have been developed which will ensure operability of the high point vent system.

Postaccident Sampling System (II.B.3)

The requirement to maintain a training, maintenance and procedure program has been added to administrative controls section of the technical specifications (TS 6.14).

The intent of the program is to ensure that the licensee has the capability to obtain and analyze reactor coolant and containment atmosphere samples under accident conditions.

Long Term Auxiliary Feedwater System Evaluation (II.E.1.1)

The objective of this item is to improve the reliability and performance of the Auxiliary Feedwater (AFW) system.

The Auxiliary Feedwater system has always been a part of the Kewaunee Nuclear Plant Technical Specifications. In Amendment No. 45, the Kewaunee Nuclear

Plant's Technical Specifications were amended in regards to operability requirements (Section 3.4) and surveillance requirements (Section 4.8) of the AFW system. This change was made as a consequence of a review of the AFW system performed in response to this item in NUREG-0737.

The existing limiting conditions for operation and surveillance requirements for the AFW system are similar to those of other safety related systems, therefore no further action is required for this item.

Noble Gas Effluent Monitors (II.F.1.1)

Generic Letter 83-37 requests that Limiting Conditions for Operations be established for this accident monitoring instrumentation. The suggested action statement reads as follows:

With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirements, initiate the preplanned alternate method of monitoring the appropriate parameter(s), within 72 hours, and:

- 1) either restore the inoperable Channel(s) to OPERABLE status within 7 days of the event, or
- 2) prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

Recently 10 CFR 50.72 and 10 CFR 50.73 were revised in an effort to reduce the amount of paper work and reports that were being generated for the inoperability of non-safety related equipment. The proposed action statement in Generic Letter 83-37, which requires submittal of a special report when the Noble Gas Effluent Monitor is inoperable for more than seven days, is contrary to this philosophy. The inclusion of Noble Gas Effluent Monitors, which are not safety related, in the Limiting Conditions for Operation section of the technical specifications is unwarranted.

The monitoring of plant gaseous effluents for noble gases, particulates and radioactive iodines is achieved by using the SPING units installed at the Kewaunee Plant. The Auxiliary Building Stack and the Containment Building Stack can be sampled and monitored for noble gases, particulates and radio-iodines.

We agree that it is desirable to have these monitors operating during plant operation, but they are not required for safe shutdown of the plant. The Noble Gas Effluent Monitors provide information during and following an accident which is considered helpful to the operator in assessing plant conditions.

We will add section 6.14 in the Administrative Controls section of the Technical Specifications to require a program be maintained which will ensure the capability of analyzing the plant gaseous effluents for noble gases. The program will include training of personnel, procedures for sampling and analysis, and provisions for maintenance of the SPING units.

Sampling and Analysis of Plant Effluents (II.F.1.2)

Generic Letter 83-37 requested the licensee to establish, implement, and maintain a program to ensure the capability of collecting and analyzing or measuring

representative samples of radioactive iodines and particulates in plant gaseous effluents during and following an accident. The NRC staff has indicated it is acceptable if the licensee reference this program in the administrative controls section of the Technical Specifications.

We propose to add section 6.14 in the administrative controls section of the technical specifications. The specification will require implementation of a program that will ensure the capability of analyzing the plant gaseous effluents for radio-iodines and particulates. The program will include training, procedures and provisions for maintenance of equipment.

Containment High Range Radiation Monitor (II.F.1.3)

As mentioned in the response to item II.F.1.1, the requirement to provide limiting condition for operation for non-safety related equipment is not warranted. The proposed action statement in Generic Letter 83-37 requires submittal of a special report if a containment high range radiation monitor is inoperable for more than seven days. The intent of the changes to 10 CFR 50.72 and 10 CFR 50.73 is to reduce the reporting requirements for inoperable "non-safety related" equipment.

Since it may be desirable to have these monitors available during an accident for assessment purposes, we will include these radiation monitors in the program required by section 6.14 in the administrative controls section of the Technical Specifications. The program will include training, procedures, and provisions for maintenance of equipment. The program will also provide for appropriate actions to restore an inoperable monitor to operable status as soon as possible.

Containment Pressure Monitor (II.F.1.4)

Containment Water Level Monitor (II.F.1.5)

and Containment Hydrogen Monitor (II.F.1.6)

Generic Letter 83-37 states limiting conditions for operation and surveillance requirements for these monitors should be included with other accident monitoring instrumentation in the present Technical Specifications. We are proposing changes to Technical Specification tables TS 3.5-6 and TS 4.1-1. We believe these changes satisfy your requirements in this regard.

Instrumentation for Detection of Inadequate Core Cooling (II.F.2)

Generic Letter 83-37 requests submittal of limiting conditions for operation and surveillance requirements for core exit thermocouples and the reactor vessel level instrumentation. Since the thermocouple upgrade and the reactor vessel level installation are not yet completed at the Kewaunee Plant, submittal of technical specifications at this time is inappropriate.

Control Room Habitability Requirements (III.D.3.4)

The control room habitability study performed in accordance with the requirements for this item in NUREG-0737, concluded that there was no need to install a toxic gas detection system at the Kewaunee Plant. Therefore, the requirement to provide LCO's and surveillance for this system is not applicable.

In addition to the toxic gas concern there was a request to provide LCO's and surveillance requirements for the control room emergency air cleanup system.

Dr. H. R. Denton
March 30, 1984

Technical Specifications TS 3.12 and TS 4.17 have been added in this proposed amendment and are formatted to be consistent with our current LCO's and surveillance requirements for the Auxiliary Building Special Ventilation System and the Shield Building Ventilation System.

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Description, Safety Evaluation
and
Significant Hazards Determination

Pages TSi, TSii, TSiii, TSv, TSvi

Pages TSi, TSii, TSiii, TSv, TSvi

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 10 CFR 50.92(c) we have determined that these changes do not represent a significant hazards concern.

Pages TS 3.1-2a, 3.1-2b, 3.1-2c, 3.1-2d and 3.1-2e

Description of Changes

Limiting condition for operation for the reactor coolant vent system were added to the technical specifications as specification 3.1.a.7 and the basis revised to reflect the change.

Safety Evaluation

The proposed limiting conditions for operation require that a vent path from both the reactor vessel head and the pressurizer steam space shall be operable and closed. We have incorporated the intent of the Standard Technical Specification (STS) by assuring that a vent path is available from the high points of the reactor coolant system prior to the reactor being made critical.

The action statements proposed are consistent with those suggested in the STS, however, the requirement to remove power from the valve actuators of all valves in the inoperable vent path is considered inappropriate. Removing power from these valves will disable the remote indication and provide the operators with no direct indication of valve position. If a valve is determined to be inoperable, it will be maintained closed by administrative procedure to prevent inadvertent opening. Since the proposed specification is intended to increase the reliability of the RCS vent system we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c) we have determined that these changes do not represent a significant hazards concern.

Pages TS 3.5-1 and Tables TS 3.5-5, TS 3.5-6 and TS 3.5-7

Description of Changes

Tables TS 3.5-5, and TS 3.5-6 have been revised to correct an administrative error. The table TS 3.5-5 currently in our technical specifications consists of two pages, each page having different title blocks and columns.

In an effort to correct this error "Table TS 3.5-5 (2 of 2)" has been revised to become "Table TS 3.5-5" and "Table TS 3.5-5 (1 of 2)" has been revised to become "Table TS 3.5-6".

In addition to correcting the administrative error, Table TS 3.5-6 was revised to include the wide range containment water level monitors, the containment hydrogen monitors, and the wide range containment pressure monitors.

Page TS 3.5-1 has been revised to reference these new tables.

Safety Evaluation

The tables were revised to include several of the TMI task action items. The addition of these items to the tables establishes limiting conditions for operation for the monitors. Since the proposed specification is intended to increase the reliability of these postaccident monitors, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c) we have determined that these changes do not represent a significant hazards concern.

Pages 3.12-1, 3.12-2Description of Changes

Limiting conditions for operation have been established for the control room post accident recirculation system and have been included as section 3.12 of the technical specifications.

Safety Evaluation

The specification has been formatted to be consistent with the currently existing specifications for the other safety related ventilation system (auxiliary building special ventilation and shield building ventilation).

Since the intent of this specification is to increase the reliability of the Control Room Post Accident Recirculation System and is consistent with current specifications, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c) we have determined that these changes do not represent a significant hazards concern.

Pages TS 4.16-1, TS 4.16-2 and TS 4.16-3

Description of Changes

Section 4.16 which details the surveillance testing requirements for the Reactor Coolant Vent System has been added to the surveillance section of the Technical Specifications.

Safety Evaluation

The cycling of the solenoid operated valves each refueling ensures that the valves are capable of opening, if required, to vent the reactor coolant system. More frequent cycling of the valves is not practical since it would provide unnecessary challenges to the reactor coolant pressure boundary during plant operation.

Flow testing is performed to assure that there are no blockages in the reactor coolant system vent piping that would prevent venting of noncondensable gases from the reactor coolant system. Flow testing is performed following each refueling by qualitatively assuring flow exists through the system during the post-refueling filling and venting of the RCS.

Since the surveillance testing is intended to increase the reliability of the Reactor Coolant Vent System, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c) we have determined that these changes do not represent a significant hazards concern.

Pages TS 4.17-1, TS 4.17-2 and TS 4.17-3

Description of Changes

Section 4.17 which details the surveillance testing requirements for the Control Room Postaccident Recirculation System has been added to the surveillance section of the Technical Specifications.

Safety Evaluation

The surveillance specification has been written to be consistent with the surveillance requirements on our other safety-related ventilation systems. The testing performed on the HEPA filters and charcoal adsorbers will provide assurance that the filters and adsorbers are not clogged by excessive amounts of foreign matter.

The demonstration of the automatic initiation capability is necessary to assure system performance capability.

Since the surveillance testing is intended to increase the reliability of the Control Room Postaccident Recirculation System, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c) we have determined that these changes do not represent a significant hazards concern.

Tables TS 4.1-1 (pages 1-5)Description of Changes

The table was revised to include the containment wide range pressure monitor, wide range containment water level and the containment hydrogen monitors as requested in Generic Letter No. 83-37.

In addition item number 19, Radiation Monitoring System, was revised to clarify which radiation monitors require periodic checks, calibrations and tests.

Safety Evaluation

As requested in Generic Letter 83-37, we have developed surveillance specifications for these monitors that are consistent with other accident monitoring instrumentation in the present Technical Specifications. The periodic testing required by the proposed Technical Specifications will provide assurance that the monitors will be operable if needed.

Since the surveillance testing is intended to increase the reliability of these post accident instrumentation monitors, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c) we have determined that these changes do not represent a significant hazards concern.

Description of Changes

Section 6.14 was added to the Administrative Controls section of the Technical Specifications requiring the licensee to implement a program ensuring the capabilities of the postaccident sampling system, the high range radiation monitors, and the monitoring of plant gaseous effluents.

Safety Evaluation

Since the addition of this specification is intended to increase the reliability of the postaccident sampling system and the plant effluent monitors, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c) we have determined that these changes do not represent a significant hazards concern.