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

SUBJECT: Application for amend to License DPR-43,consisting of  
 Proposed Amend 62, revising Tech Specs for consistency w/new  
 reporting requirements of 10CFR50.73, "LER Sys."

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**WISCONSIN PUBLIC SERVICE CORPORATION**


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

July 27, 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. 62 to the KNPP Technical Specifications

References: 1) Letter to All Licensees and Applicants for Operating Power Reactors and Holders of Construction Permits for Power Reactors from D. G. Eisenhower of the NRC dated December 19, 1983.

Enclosed please find three (3) signed and notarized original transmittal letters and forty (40) copies of Proposed Amendment No. 62 to the Kewaunee Nuclear Power Plant Technical Specifications. This proposed amendment is being submitted to revise the Technical Specifications consistent with the new reporting requirements of 10 CFR 50.73 "Licensee Event Report System." Various changes have been made consistent with the Model Technical Specifications provided by the NRC in Reference 1 along with other conforming changes to reflect the revised reporting requirements. They are clarifying and/or administrative in nature and as such do not involve a safety or significant hazards concern.

The following pages are affected by this proposed amendment:

TS i	TS 3.15-3	TS 6-11a
TS iv	TS 4.2-7	TS 6-12
TS v	TS 4.2-9	TS 6-15
TS 1.1-5	Table TS 4.2-2	TS 6-16
Table TS 3.5-5 (1 of 2)	TS 4.9-1	TS 6-17
TS 3.11-2	TS 6-5	TS 6-18
TS 3.15-1	TS 6-10	TS 6-19
TS 3.15-2	TS 6-11	TS 6-23

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Mr. H. R. Denton  
July 27, 1984  
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A description of the specific changes in this proposed amendment, along with the appropriate safety evaluations and significant hazards determinations, are identified in Enclosure I to this letter. The affected pages are attached in Enclosure II.

In accordance with the provisions of 10 CFR 50.91(b)(1), a copy of this submittal has been transmitted to the Public Service Commission of Wisconsin.

As noted in Reference 1, since this proposed amendment is being submitted at the request of the Commission no license fee need be remitted.

Very truly yours,



Carl W. Giesler  
Vice President - Power Production

JGT/js

Enc.

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

Subscribed and Sworn to  
Before Me This 27<sup>th</sup> Day  
of July 1984

  
Notary Public, State of Wisconsin

My Commission Expires:  
June 28, 1987

Enclosure I to the Letter from C. W. Giesler

To H. R. Denton

Dated July 27, 1984

Proposed Amendment No. 62 to the KNPP Technical Specifications

Description,

Safety Evaluation

and

Significant Hazards Determination

Proposed Amendment No. 62 to the KNPP Technical Specifications

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

Table of ContentsPages TSi, TSiv and TSvDescription 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.

Section 1.0 DefinitionsTS 1.0.n; Page TS 1.1-5Description of Changes

A new definition has been added for the term "Reportable Event" which is consistent with the Model Technical Specifications provided by the NRC in Reference 1 and 10CFR50.73 "Licensee Event Report System." The deletion of the term "Reportable Occurrences" was not necessary since it was not previously included in this section of the Technical Specifications.

Safety Evaluation

Since these changes are clarifying in nature and consistent with the NRC's Model Technical Specifications which have already been reviewed and approved by the NRC, 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.

Section 3.5 Instrumentation System

Table TS 3.5-5; Page 1 of 2

Description of Changes

A note referencing Section 6.9.b.2 of the Technical Specifications and its application has been deleted since the requirements contained in 10 CFR 50.73 replace all existing requirements to report Reportable Occurrences contained in individual plant Technical Specifications.

Safety Evaluation

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

Significant Hazards Concern

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.

Section 3.11 Core Surveillance Instrumentation

TS 3.11.d; Page TS 3.11-2

Description of Changes

Reference to the now defunct Atomic Energy Commission has been revised to just the Commission. This is consistent with other special reporting requirements contained in the Technical Specifications.

Safety Evaluation

These changes do not alter the intent of the specifications, but merely clarifies them. Therefore, they are strictly administrative in nature and 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.

### Section 3.15 Fire Protection System

TS 3.15.a.2, TS 3.15.b.3, TS 3.15.b.4.B, TS 3.15.c and TS 3.15.d; Pages TS 3.15-1 through TS 3.15-3

#### Description of Changes

Reference to Section 6.9.2 of the Technical Specifications has been deleted since the requirements contained in 10 CFR 50.73 replace all existing requirements to report Reportable Occurrences contained in individual plant Technical Specifications. However, these special reports are still required to be submitted to the Commission in lieu of a Licensee Event Report. Minor wording changes have also been incorporated to provide guidance on the information to be included in these reports.

#### 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.

### Section 4.2 Reactor Coolant System Inservice Inspection

TS 4.2.b.5.c; Page 4.2-7

#### Description of Changes

Reference to Section 6.9.2.a of the Technical Specifications has been deleted since the requirements contained in 10 CFR 50.73 replace all existing requirements to report Reportable Occurrences contained in individual plant Technical Specifications. However this special report is still required to be submitted to the Commission in lieu of a Licensee Event Report. Therefore, the Commission must still be notified prior to the resumption of plant operation with a written followup report submitted within 30 days.

#### 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.

Basis; Page TS 4.2-9

Description of Changes

The basis has been modified to reflect the changes made to TS 4.2.b.5.c.

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.

Table TS 4.2-2

Description of Changes

The table has been revised to reflect the changes made to TS 4.2.b.5.c.

Safety Evaluation

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

Significant Hazards Concern

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.

Section 4.9 Reactivity Anomalies

TS 4.9; Page TS 4.9-1

Description of Changes

Reference to Section 6.9.2 of the Technical Specifications has been deleted since the requirements contained in 10CFR50.73 replace all existing requirements to report Reportable Occurrences contained in individual plant Technical Specifications. However, this special report is still required to be submitted to the Commission in lieu of a Licensee Event Report.



#### 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.

### Section 6.5 Review and Audit

#### TS 6.5.1.6.i; Page TS 6-5

##### Description of Changes

The responsibility for PORC to review all Reportable Events has been added consistent with the Model Technical Specifications provided by the NRC in Reference 1.

##### Safety Evaluation

Since these changes are purely administrative in nature and consistent with the NRC's Model Technical Specifications which have already been reviewed and approved by the NRC, 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.

#### TS 6.5.3.7.g; Page TS 6-10

##### Description of Changes

The requirement for NSRAC to review reports covering all Reportable Events has been incorporated consistent with the Model Technical Specifications provided by the NRC in Reference 1. It replaces the requirement for NSRAC to review all events which are required by regulations or Technical Specifications to be reported to the NRC in writing within 24 hours.

##### Safety Evaluation

Since these changes are purely administrative in nature and consistent with the NRC's Model Technical Specifications which have already been reviewed and approved by the NRC, 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.

#### Section 6.6 Reportable Events

##### TS 6.6.1; Pages TS 6-11 and TS 6-11a

#### Description of Changes

Section 6.6, which was previously deleted, has been moved from the bottom of page TS 6-11 to a new page TS 6-11a. A new Section 6.6 "Reportable Events - Actions" has been added consistent with the Model Technical Specifications provided by the NRC in Reference 1.

#### Safety Evaluation

Since these changes are purely administrative in nature and consistent with the NRC's Model Technical Specifications which have already been reviewed and approved by the NRC, 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.

#### Section 6.7 Safety Limit Violation

##### TS 6.7.1.c; Page TS 6-12

#### Description of Changes

Reference to Section 6.9 of the Technical Specifications has been deleted since the requirements contained in 10CFR50.73 replace all existing requirements to report Reportable Occurrences contained in individual plant Technical Specifications. However, this special report is still required to be submitted to the Commission within 30 days. The report shall be prepared in accordance with Section 6.6 "Reportable Events" since a safety limit violation is also reportable in accordance with 10CFR50.73.

#### 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.

### Section 6.9 Reporting Requirements

#### TS 6.9.2; Pages TS 6-15 through TS 6-19

##### Description of Changes

Section 6.9.2 of the Technical Specifications has been deleted since the requirements contained in 10CFR50.73 replace all existing requirements to report Reportable Occurrences contained in individual plant Technical Specifications. These changes are consistent with the Model Technical Specifications provided by the NRC in Reference 1.

##### Safety Evaluation

Since these changes are purely administrative in nature and consistent with the NRC's Model Technical Specifications which have already been reviewed and approved by the NRC, they do not involve any 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.

### Section 6.10 Record Retention

#### TS 6.10.1.c; Page TS 6-23

##### Description of Changes

A requirement to retain reports of all Reportable Events for at least five years has been incorporated consistent with the Model Technical Specifications provided by the NRC in Reference 1. It replaces the requirement to retain reports of all events which are required by regulation or Technical Specifications to be reported to the NRC in writing within 24 hours for at least five years.

##### Safety Evaluation

Since these changes are purely administrative in nature and consistent with the NRC's Model Technical Specifications which have already been reviewed and approved by the NRC, they do not involve a safety concern.

Dr. H. R. Denton  
July 27, 1984  
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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.

Enclosure II to the Letter from C. W. Giesler

To H. R. Denton

Dated July 27, 1984

Proposed Amendment No. 62 to the KNPP Technical Specifications

Affected Pages