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 AUTH. NAME AUTHOR AFFILIATION
 HINTZ, D.C. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Advises that current Tech Specs & existing procedures address concerns stated in 830324 ltr. No changes necessary re rod position indication in shutdown modes.

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WISCONSIN PUBLIC SERVICE CORPORATION


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

September 25, 1984

Director of Nuclear Reactor Regulation
 Attention: Mr. S. A. Varga, Chief
 Operating Reactors Branch No. 1
 Division of Licensing
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Gentlemen:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
 TAC #49359
Rod Position Indication for Shutdown Modes

Reference: 1) Letter from S. A. Varga (NRC) to C. W. Giesler (WPSC) dated
 March 24, 1983
 2) Letter from D. C. Hintz (WPSC) to S. A. Varga (NRC) dated
 August 15, 1984

In reference 1, you informed us of your concern regarding technical specifications on rod position indication during plant operation in the shutdown modes. In reference 2, we informed you of the method of operation in the shutdown modes and the rod position indication requirements at Kewaunee Nuclear Power Plant (KNPP). However, one statement made in reference 2 deserves clarification.

In reference 2, the statement was made, "In the cold shutdown mode, all rods are fully inserted." All control rods are fully inserted in the cold shutdown mode. However, KNPP's operating procedures do not require the shutdown banks to be fully inserted in the cold shutdown mode. It is typical operating practice at KNPP to maintain cold shutdown with all control rods and shutdown banks fully inserted. However, we felt it was necessary to clarify the above statement as our operating procedures do allow the shutdown banks to be withdrawn.

In response to the concerns of reference 1 for the cold shutdown mode, the calculation of the cold shutdown boron concentration does not take credit for the insertion of the shutdown banks. The calculation of the cold shutdown boron concentration assumes the shutdown banks and the highest worth rod are fully

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Mr. S. A. Varga
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withdrawn and conservatively includes an additional 100 ppm. Therefore, the minimum shutdown margin is maintained independent of either shutdown bank's position.

To summarize this letter and reference 2, we feel that the current KNPP technical specifications along with existing procedures address the concerns stated in your letter (reference 1) and no changes are necessary in the area of rod position indication in the shutdown modes.

Very truly yours,


D. C. Hintz
Manager - Nuclear Power

KAH/js

cc - Mr. Robert Nelson, US NRC