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Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for Amend to License DPR-43, changing Tech Spec Pages TS 4,4-3 & TS 4,4-12 to allow Type B & C tests to be performed prior to Type A tests during same refueling outage.

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### WISCONSIN PUBLIC SERVICE CORPORATION

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



January 22, 1985

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
TAC #M49131
Proposed Amendment No. 52C, Appendix J Technical Specifications

#### References:

- D. G. Eisenhut to C. W. Giesler, SER on Appendix J Technical Specifications, dated September 30, 1982
- 2) C. W. Giesler to Dr. Harold Denton, Proposed Amendment No. 52 dated November 10, 1982
- 3) C. W. Giesler to S. A. Varga, Revision A to Proposed Amendment No. 52 dated January 13, 1983
- 4) C. W. Giesler to Dr. Harold Denton, Proposed Amendment No. 52B dated August 9, 1983
- 5) D. C. Hintz to W. S. Little, Inspection Report No. 50-305/84-19 (DRS), dated December 21, 1984

On December 3, 1984 WPSC received a Notice of Violation for noncompliance with 10 CFR 50, Appendix J during Kewaunee's 1984 refueling outage. Specifically, WPSC performed Type B and C tests prior to performing the Type A test and did not add a conservative measure of (pre-post) repair differential leakage to calculate the as-found leakage rate.

In reference 4 WPSC committed to reviewing proposed technical specification Amendments 52, 52A, and 52B to ensure consistency with 10 CFR 50 Appendix J and certain exemptions granted to WPSC from Appendix J (reference 1).

This review revealed one Technical Specification and associated basis which, when revised will assure the non-compliance referenced above will not reoccur.

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The Technical Specification pages affected by this change, pages TS 4.4-3 and TS 4.4-12, are enclosed as proposed Amendment No. 52C. Below is a short description of the change, a safety analysis, and the significant hazards determination.

#### Technical Specification 4.4.b.3

#### Description of Proposed Change

Attached page TS 4.4-3, Technical Specification 4.4.b.3, was revised to ensure compliance with an exemption granted to WPSC from 10 CFR 50, Appendix J (reference 1). Specifically, Type B and C tests may be performed prior to Type A tests and during the same refueling outage provided a conservative measure of (pre-post) repair differential leakage is added to the Type A test results.

#### Safety Analysis for Proposed Technical Specification 4.4.b.3

This Technical Specification change does not pose an unreviewed safety question. The Technical Specification is consistent with an exemption granted to WPSC from Appendix J in an SER dated September 30, 1982 (reference 1).

Significant Hazards Determination for Proposed Technical Specification 4.4.b.3

This technical specification change does not pose a significant hazard since there are no safety limits or bases of safety limits being relaxed, there is no relaxation in limiting conditions of operation, core power level is not increased, there are no unreviewed safety questions, and safety margins are not compromised.

# Page TS 4.4-12, Basis for Technical Specification 4.4.b.3

### Description of Proposed Change

The basis of Technical Specification 4.4.b.3 has been revised to include the rationale for including Type B and C leakage repaired prior to and during the same refueling outage as a Type A test.

#### Safety Analysis

There are no unreviewed safety questions. A Technical Specification Basis was revised in order to clarify the intent of a Technical Specification; hence any unreviewed safety questions would address the Technical Specification and not the Basis.

# Significant Hazards Determination

Revising this Technical Sepcification Basis does not present a significant hazard as the respective Technical Specification does not present a significant hazard.

In accordance with the requirements of 10 CFR 50.90, enclosed are three (3) signed and notarized originals of this letter and forty (40) copies of the revi-

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sions to the pages affected by Proposed Amendment No. 52C. As required by 10 CFR 50.91(b)(1) a copy of this submittal is being sent to the Public Service Commission of Wisconsin.

This submittal addresses the same technical issue as proposed Amendments 52, 52A and 52B which addressed the same issue as proposed Amendment No. 23 dated November 5, 1975. Proposed Amendment No. 23 was submitted prior to the March 23, 1978 enactment of 10 CFR 170.22, Schedule of Fees for Facility License Amendment, thereby exempting this issue (Appendix J) from fees for processing license amendments.

Very truly yours,

Carl W. Giesler

Vice President - Power Production

GWH/js

Enc.

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

Mr. R. S. Cullen, PSCW

Wotary Public, State of Wisconsin

My Commission Expires: June 28, 1987 Attachment to Letter

To Dr. H. R. Denton from D. C. Hintz

KNPP Technical Specification Pages

Affected by

Proposed Amendment No. 52C

January 22, 1985