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AUTH.NAME AUTHOR AFFILIATION
GIESLER,C.W. Wisconsin Public Service Corp.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to License DPR-43,revising Tech Spec Pages 3.4-1,3.4-2 & 3.4-3 re inservice insp testing of main steam sys.Fee paid.

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WISCONSIN PUBLIC SERVICE CORPORATION
P.O. Box 1200, Green Bay, WI 54305

February 7, 1985

Dr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Denton:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment No. 65 to KNPP Technical Specifications

References:
1. Approved Amendment 51; KNPP TS; December 28, 1983
2. Letter; C. W. Giesler to D. G. Eisenhut; February 8, 1984
3. Letter; C. W. Giesler to D. G. Eisenhut; April 6, 1984
4. Letter; S. A. Varga to D. C. Hintz; January 22, 1985
5. ASME; Inservice Testing of Valves; IWV-3511 to 3514

Enclosed please find three (3) signed and notarized transmittal letters and 40 copies of Proposed Amendment 65 to the Kewaunee Nuclear Power Plant Technical Specifications (KNPP TS).

A check for the amount of $150 is enclosed with this letter in compliance with 10 CFR 170.12.

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

Page TS 3.4-1, TS 3.4-2, and TS 3.4-3 are affected.

Due to unexpected complications it is necessary for WPS to ask the NRC to expedite its review on this proposed amendment. We realize the need for an expedient review places a strain on the limited resources of the NRC. However, we are confident that once you understand the circumstances you will approve the proposed amendment.

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Approved Amendment 51, see reference 1, to KNPP TS deleted the phrase "except during testing" from TS 3.4.a.1. At the time, WPSC did not object because we could not foresee any circumstances under which both steam generators would have to be operable under test conditions. However, for reasons outlined in the attached safety analysis, the 10-year inservice inspection (ISI) hydrostatic test of the main steam system, and the inservice testing (IST) of the main steam safety valves should be conducted while the plant is in a hot shutdown condition. For test details see references 2, 3, 4, and 5. With the support of our NRC project manager WPSC began negotiations with the NRC to have the phrase "except during testing" reinstated in TS 3.4.a.1. On January 30, 1985 we were informed that the NRC would not reinstate the phrase without a request for amendment.

Therefore, WPS is respectfully submitting Proposed Amendment 65 to the Commission. WPS would prefer the proposed change as submitted; however, if it is unacceptable, we ask that a one time exemption from TS 3.4.a.1 be granted. This would allow us to perform these tests, thereby fulfilling our inservice inspection requirements.

Sincerely,

Carl W. Giesler
Vice President - Power Production

TJW/js

Enc.

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

Subscribed and Sworn to
Before Me This 7th Day
of February 1985

Notary Public, State of Wisconsin

My Commission Expires:
June 28, 1987

Description of Change

On page 3.4-1 change TS 3.4.a.1 from: "Five main steam safety valves per operable steam generator are available." to: "Five main steam safety valves per operable steam generator are available except during testing."

On page TS 3.4-2 add the following to the basis: Testing of the main steam system while the plant is in hot shutdown conditions is permitted provided that at least two main steam safety valves per steam generator are available to provide sufficient relief capacity to protect the system during the test.

Move the last paragraph on page TS 3.4-2 to page TS 3.4-3 to allow room for the addition to page TS 3.4-2.

Safety Analysis

This change would allow WPSC to conduct the "10-year" inservice inspection hydrostatic test of the steam generators, and inservice testing of the main steam safety valves as requried by the ASME Code, Sec. 11 and NRC regulations.

The portion of main steam line piping between the steam generators and the isolation valves was not intended for a water filled environment. Subsequent analysis has shown that the existing piping support design is capable of withstanding the additional loading associated with the postulated water fill event. However, any unnecessary challenging of the system under water fill conditions is not justified. In addition, the operability of the control valves, relief valves, and the main steam isolation valves is questionable under water solid conditions. This could damage the valves and give inaccurate results.

Furthermore, there is a possibility of residual water in the system after the test is complete. This could result in costly and undesirable turbine blade pitting. To prevent these problems WPSC submitted an alternate test method to the Commission (references 2 and 3). This method, which has been approved by the Commission (reference 4) requires the plant to be maintained in a hot shutdown condition. It also requires that the two lowest set safety valves per steam generator be gagged. The gagging of these four valves would violate present KNPP TS.

The inservice test requirements of the ASME Code requires that all safety valve setpoints be checked once per 5 years. WPSC has chosen to do this testing on a schedule in which two valves per year are tested. In the past, WPSC has remained within TS by testing two valves on the same line and leaving the other steam generator in service. This year we are required to test one valve on each line. This would result in one safety valve for each steam generator being considered inoperable; therefore, violating present KNPP TS. This condition could occur every 5 years, or sooner depending on maintenance scheduling, if present KNPP TS are not changed.

If the ISI hydrostatic test and the IST of the main steam safety valves are conducted as required during the 1985 refueling, three safety valves per steam generator will be considered inoperable. This will not defeat the safety functions of the main steam system during hot shutdown conditions. The two remaining valves per steam generator supply sufficient relief capacity to protect the system, and supply a sufficient heat sink during test conditions. Therefore, we have determined the public's health and safety are not at risk.

Significant Hazards Determination

Based on the Safety Analysis and guidelines provided by 10 CFR 50.92(c) we have determined that this change does not represent a significant hazards concern.