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HINTZ, D. C. Wisconsin Public Service Corp.
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LEAR, G. E. Office of Nuclear Reactor Regulation, Director (post 851125

SUBJECT: Withdraws 840404 application for amend to License DPR-43, changing Tech Specs to add lower limit to time delay re first level undervoltage trip of safeguards 4,160-volt buses.

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PUBLIC SERVICE

WISCONSIN PUBLIC SERVICE CORPORATION

February 21, 1986

Director of Nuclear Reactor Regulation
Attention: Mr. G. E. Lear, PWR Project Directorate-1
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
First Level Undervoltage Trip Time Delay

Reference: 1. Letter from C. W. Giesler (WPSC) to H. R. Denton (US NRC) dated April 4, 1984

Reference 1 committed Wisconsin Public Service Corporation (WPSC) to changing the Technical Specifications (TS) for the Kewaunee Nuclear Power Plant to add a lower limit to the time delay associated with the first level undervoltage trip of the safeguards 4160 volt buses. Originally, WPSC committed to proposing a TS change by September 1, 1984. This date was subsequently changed to March 15, 1986 by telephone conversations between WPS and the NRC.

The first level undervoltage trip assures that a safeguards bus will be tripped from its power supply if the power supply voltage drops below 85% $\pm$ 2% of its nominal voltage for more than 2.5 seconds. This is designed to prevent against a loss of voltage to the safeguards buses and assures that safeguard protective actions will be accomplished as assumed in the FSAR.

The proposed TS would require the undervoltage trip to have a minimum time delay in addition to the existing maximum time delay of 2.5 seconds, thereby establishing a range in which the setpoint must be maintained. The time delay prevents the safeguards buses from inadvertently tripping due to short lived fluctuations in their power supply. The shorter the time delay the greater the probability that a bus will trip due to an undervoltage condition. The apparent NRC concern is that a relatively short time delay could cause inadvertent

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tripping of the safeguards buses due to short lived fluctuations in their power supplies. An evaluation of this commitment has determined that the minimum time delay resolves a reliability concern rather than a safety concern. When a bus trips it will either be automatically reconnected to an offsite source, if one is available, or to its diesel generator, hence providing a viable source. In the Final Safety Analysis, the alternate sources receive the same credit as the primary source. Hence, there is no safety concern.

Therefore, while WPSC maintains the lower time setpoint in a manner which experience has demonstrated to have minimized inadvertent actuations, we believe it is inappropriate to propose a T.S. governing the selection of this setpoint.

This letter serves to withdraw our previous commitment and closes this issue.

Sincerely,

Carlton Fiedler
for

D. C. Hintz
Manager - Nuclear Power

TJW/jms

cc - Mr. Robert Nelson, US NRC