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DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125

SUBJECT: Application for proposed amend 72a to License DPR-43 adding Item P, "std shutdown sequence" to defunction section to clarify operating practice for shutting down plant.

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June 24, 1986

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. 72a, Reactor Trip Breaker Testing

Reference: 1) Letter from D. C. Hintz to H. R. Denton dated April 18, 1986
2) Letter from D. G. Eisenhut (NRC) to C. E. Norelius (NRC) dated March 23, 1983

Reference 1 submitted Proposed Amendment 72 (Reactor Trip Breaker Testing) to the KNPP Technical Specifications in response to Generic Letter 85-09. This proposed amendment took several exceptions to the wording provided in Generic Letter 85-09.

During a telephone conversation on May 20, 1986 with members of your staff, WPSC agreed to modify our original Proposed Amendment No. 72 and resubmit the entire amendment. This letter provides proposed amendment No. 72a which incorporates those changes agreed upon during the telephone conversation. In particular, one request that we agreed to include was a Standard Shutdown Sequence. Please note that our interpretation on shutdown time allowances when limiting condition for operation (LCO) is not met is in agreement with reference 2.

Enclosure 1 provides a description of the proposed changes along with a significant hazards determination. Enclosure 2 contains the pages affected by this proposed amendment.

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In accordance with the requirements of 10 CFR 50.30, you will find enclosed three (3) signed and notarized originals of this letter and forty (40) copies of the revisions to the pages affected by Proposed Amendment 72a. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1). In accordance with the provisions of 10 CFR 170, a check for $150 was submitted with proposed amendment No. 72 and therefore no additional fee is required with this revision to the proposed amendment.

Sincerely,

E. R. Mathews for
Carl W. Giesler
Vice President - Power Production

DJM/jms

Enc.

cc - Mr. G. E. Lear, US NRC
Mr. Robert Nelson, US NRC
Mr. R. S. Cullen, PSCW

Subscribed and Sworn to
Before Me This 24th Day
of June 1986

Jeanne M. Stein
Notary Public, State of Wisconsin

My Commission Expires:
June 28, 1987

ENCLOSURE 1

Kewaunee Nuclear Power Plant

Technical Specification

Letter from C. W. Giesler (WPSC) to

H. R. Denton (NRC) dated June 24, 1986

Description of Proposed Change

and

Significant Hazards Determination

for

Proposed Amendment No. 72a

Technical Specification Change to Section 1.0 - Definitions

Description of Proposed Change

Item 'p' "Standard Shutdown Sequence" was added to the definition section. This definition clarifies our current operating practice for shutting down the plant and applies the definition where appropriate throughout the KNPP Technical Specifications. The times for achieving each shutdown mode are consistent with current operating practices. These time periods were approved in KNPP Technical Specification Amendment No. 63 dated September 3, 1985 for specific safeguards equipment limiting conditions for operation (LCO).

Significant Hazards Determination and Safety Analysis

This Technical Specification (TS) change does not pose an unreviewed safety question since it provides additional control not presently included in the current TS. This definition is applicable to LCOs in the KNPP TS which require a shutdown and where no specific shutdown sequence is specified. The time periods provide plant operations with the time and flexibility to review the situation and place the plant in the proper mode of operation in a planned and controlled fashion, thereby ensuring safety. The proposed change does not involve a significant hazards consideration because operation of the Kewaunee Nuclear Plant in accordance with this change would not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated. This Technical Specification change

provides additional control by defining a specific shutdown sequence. The additional control provided increases safety because a plant shutdown is not assumed to be an accident initiator and the consequences of an accident are reduced by reducing power. The times for achieving each shutdown mode are consistent with current operating practices. These time periods were approved in KNPP Technical Specification Amendment No. 63 dated September 3, 1985 for specific equipment LCO times. Since this change provides additional control by defining a shutdown sequence to be followed when a shutdown is required, this change cannot increase the probability or consequences of an accident.

2) Create the possibility of a new or different kind of accident from previously analyzed. The change clarifies the required shutdown sequence and the allowable time to do so. The shutdown sequence and time periods for achieving each shutdown mode are the same sequence and time periods which were previously approved in Technical Specification Amendment No. 63. Therefore, this request does not create the possibility of a new or different kind of accident.

3) Involve a significant reduction in a margin of safety. Prior to this proposed change there was no technical specification defined "Shutdown Sequence" which was to be followed when the plant was required to shut down. This specification provides additional control and no reduction in a margin of safety.

This change is similar to an example from the supplementary information of 10 CFR Part 2 section C.2.E item (ii) as stated below:

(ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement.

Technical Specification Change to Page TS 3.5-2

Description of Proposed Change

The basis for section 3.5 was revised to include a discussion of the diverse trip features which exist to effect a reactor trip for each reactor trip breaker. This change to the basis is applicable to Table TS 3.5-2 Item 17, Reactor Trip Breaker.

Significant Hazards Determination and Safety Analysis

This change to the basis for section 3.5 is necessary to ensure no confusion occurs as a result of the addition of Item 17 in Table TS 3.5-2. Changes to the technical specification basis merely aids in the interpretation of the specification by providing additional clarification. This proposed change does not involve a significant hazards consideration because operation of the Kewaunee Nuclear Plant in accordance with this change would not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated;

2) Create the possibility of a new or different kind of accident from previously analyzed;

3) Involve a significant reduction in a margin of safety. This change does not reduce a safety factor in a technical specification basis. It provides additional clarification to Table TS 3.5-2, Item 17.

Technical Specification Change to Table TS 3.5-2, Instrument Operation Condition for Reactor Trip

Description of Proposed Change

Technical Specification Table TS 3.5-2 was revised to include provisions for immediately declaring the reactor trip breakers inoperable should one of the diverse trip features (shunt trip attachment or undervoltage trip attachment), become inoperable. This change identifies the requirement to independently test the shunt and undervoltage trip attachments. Furthermore, with a reactor trip breaker inoperable this technical specification will limit the length of time the plant is allowed to operate on the bypass breaker to 72 hours.

Significant Hazards Determination and Safety Analysis

The addition of Item 17 identifies the requirement to independently test the shunt and undervoltage trip attachment for determining breaker operability. It also provides an action statement should either one of the trip attachments become inoperable.

Generic Letter 85-09 would consider the breaker operable for up to 48 hours should one of the diverse trip features become inoperable. Our technical specification change would require the breaker to be declared immediately inoperable if either of the diverse trip features is inoperable, and would

require the plant to proceed to the hot shutdown condition in accordance with our standard shutdown sequence if the breaker could not be replaced or restored to an operable status within 72 hours. The 72 hours time period to replace or restore the reactor trip breaker to operable status is justifiable based upon the following. Our proposed change provides consistency within the KNPP Technical Specifications for requiring a plant shutdown with out-of-service engineered safety features equipment. The 48-hour time period identified in Generic Letter 85-09 is arbitrary and in addition, there is only a small difference in time between the two time periods. Our proposed technical specification change is a conservative improvement over the current KNPP Technical Specification which allows up to 37 days of plant operation on the bypsss breaker. Finally, concurrent failure of both the undervoltage trip attachment and the shunt trip attachment is extremely unlikely, and therefore the ability to trip on demand can be expected for this short time period allowed. It is important to note that a breaker failure is readily identifiable and procedures are in place to rectify the problem. Therefore, this change does not involve a significant hazards consideration because operation of the Kewaunee Nuclear Plant in accordance with this change would not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated. This change adds the requirement to independently test the shunt and undervoltage trip attachments. This change also provides for a more stringent shutdown requirement than currently in the KNPP Technical Specification. That is, if the breaker

cannot be replaced or restored to an operable status after 72 hours, the plant would be required to proceed to the hot shutdown condition. The KNPP Technical Specification currently allows a significantly longer time period. Therefore, this change does not increase the probability or consequences of an accident.

2) Create the possibility of a new or different kind of accident from previously analyzed. This request is more restrictive than our current requirement. This change is bounded by our current analysis and therefore does not create the possibility of a new or different kind of accident.

3) Involve a significant reduction in a margin of safety. Currently there is no explicit technical specification requirement to independently test the shunt and undervoltage trip attachment. Existing technical specifications for a reactor trip breaker being out of service were not explicit; however, a 37-day maximum was implicit. This letter provides technical specifications as requested in Generic Letter 85-09. They are more restrictive and explicit than our current technical specifications and hence do not cause a reduction in the margin of safety.

This change is similar to an example from the supplementary information of 10 CFR Part 2 section C.2.E. item (ii) as stated below:

(ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement.

Technical Specification Change to Table 4.1-3, Minimum Frequencies For Equipment Tests

Description of Proposed Change

Technical Specification Table 4.1-3 was revised to include testing of the control room manual reactor trip circuit at least once each refueling outage. In addition, note 2 was included to require an operability test be performed on the bypass breaker undervoltage trip attachment prior to placing the breaker into service.

Significant Hazards Determination and Safety Analysis

This Technical Specification change does not pose an unreviewed safety question since it provides additional control not presently included in the technical specification. This table is being revised to provide additional testing which further ensures the operability of the trip function if needed. It should be noted that the requirement to perform an operability test on the bypass breaker prior to placing the breaker into service, has always been a part of the KNPP surveillance procedure even though this requirement was not explicit in the KNPP Technical Specification. In spite of this fact, this requirement is being added to provide the NRC staff further assurance that this requirement will continue to be performed in the future. The proposed change does not involve a significant hazards consideration because operation of the Kewaunee Nuclear Plant in accordance with this change would not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated. This Technical Specification change provides additional requirements for testing the control room manual reactor trip circuitry and for testing the bypass breaker undervoltage trip attachment prior to placing the breaker into service. Since this change requires additional testing where no explicit prior testing requirements existed, this change cannot increase the probability or consequences of an accident.

2) Create the possibility of a new or different kind of accident from previously analyzed. This change does not affect the reactor coolant pressure boundary or any of the plant engineered safety features. This change enhances safety by providing additional testing requirements of the reactor protection system (RPS) and is consistent with Generic Letter 85-09. Thus we have determined that this change does not create the possibility of a new or different kind of accident.

3) Involve a significant reduction in a margin of safety. Prior explicit Technical Specifications requiring manual reactor trip testing or bypass breaker undervoltage trip attachment testing did not exist. With the additional testing requirements the reactor trip system is enhanced, thus we conclude that there is no reduction in the margin of safety.

This change is similar to an example from the supplementary information of 10 CFR Part 2 section C.2.E. item (ii) as stated below:

(ii) A change that constitutes an additional limitation, restriction or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement.