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 AUTH. NAME AUTHOR AFFILIATION
 HINTZ, D. C. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 LEAR, G. E. PWR Project Directorate 1

SUBJECT: Clarifies commitment in Amend 60 to License DPR-43, revising
 Tech Specs re procedure control. Procedure changes can be
 approved by two knowledgeable persons, one of whom shall hold
 valid SRO license.

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WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

October 28, 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
TAC #55221
Clarification of Commitment in T.S. Amendment 60

- References:
- 1) Letter from C. W. Giesler (WPSC) to H. R. Denton (NRC)
dated June 4, 1984 submitting proposed T.S. Amendment 60.
 - 2) Letter from C. W. Giesler (WPSC) to H. R. Denton (NRC)
dated August 21, 1984, submitting proposed T.S. Amendment 60a.
 - 3) Letter from M. B. Fairtile (NRC) to D. C. Hintz (WPSC)
dated January 22, 1985, issuing Technical Specification
Amendment 60.

Proposed Technical Specification Amendment 60 to the Kewaunee Operating License was submitted to the NRC on June 4, 1984 (reference 1) and subsequently revised on August 21, 1984 (reference 2). The NRC issued Amendment 60 along with the attendant staff safety evaluation on January 22, 1985 (reference 3).

One of the issues involved in this amendment concerned our T.S. commitments regarding procedure control. The Technical Specification committed WPSC to ANSI N18.7-1972 while our approved Operational Quality Assurance Program (OQAP) committed us to ANSI N18.7-1976 with certain exceptions. This amendment was intended to bring the Technical Specification into agreement with the OQAP.

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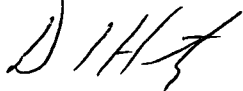
Since the later version of the ANSI 18.7 included the controls which had been explicitly described in the T.S., the associated paragraphs were deleted. One exception was added to the specification: The ANSI standard states that procedure changes which clearly do not alter the intent of the procedure can be approved by two knowledgeable individuals, one of whom shall be the shift supervisor; however, the specification proposed allowed approval by two knowledgeable individuals, one of whom shall hold a valid SRO license (NOT necessarily the shift supervisor).

In addition to bringing our commitments into agreement, it was further intended that this specification would relieve the Shift Supervisor and the Plant Operations Review Committee (PORC) from the requirement of having to review and approve minor changes to approved procedures, and thereby not distract them from their primary concern of plant safety. It was not stated nor was it our intent that these minor procedure changes would be returned to the PORC for additional review.

Notwithstanding, the NRC safety evaluation stated, "We also agree that minor procedure changes may be initiated by an SRO other than the shift supervisor since these changes are also reviewed and approved by the PORC." This restatement of our technical specification requirement provides a different meaning (although we believe it was unintentional) to what we intended. ANSI 18.7 and our Technical Specification clearly state that the SRO can approve minor procedure changes. It is clear that an additional review and approval by PORC is neither warranted nor intended. Indeed, if we were to implement such a practice, the intended benefit of the amendment would be nullified. Furthermore, the resulting diversion of PORC's attention to the inconsequential is not in the best interest of safety.

Our current practice of not returning minor procedure changes to PORC is in concert with the intent of the Technical Specification Amendment; however, we felt obligated to clarify our position and thereby preclude any future misunderstanding.

Sincerely,



D. C. Hintz
Vice President - Nuclear Power

DR/jms

cc - Mr. Robert Nelson, US NRC