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 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305  
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 RECIP. NAME: RECIPIENT AFFILIATION  
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Affirms commitment to operate facility w/nuclear heat flux  
 peaking factor penalty of 0.05 imposing max FQ value of 2.23  
 or Tech Spec limit, until reanalysis confirming applicability  
 of K(Z) to Exxon Nuclear fuel submitted.

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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



May 3, 1985

Director of Nuclear Reactor Regulation  
Attention: Mr. S. A. Varga, Chief  
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  
Request for Information Pursuant to 10 CFR 50.46(f)

- References:
- 1) Letter from H. L. Thompson (NRC) to D. C. Hintz (WPSC) requesting information pursuant to 10 CFR 50.46(f), dated April 5, 1985
  - 2) Letter from C. W. Giesler (WPSC) to H. R. Denton (NRC) requesting an exemption from 10 CFR 50.46, dated March 27, 1985
  - 3) Letter from D. C. Hintz (WPSC) to S. A. Varga (NRC) providing additional information regarding Exxon Nuclear ECCS analyses, dated April 4, 1985

Reference 1 requested that Wisconsin Public Service Corporation (WPSC) provide a reevaluation of the large break LOCA analyses for Kewaunee using an acceptable evaluation model no later than six months from the date of the letter.

Although we had previously provided NRC a detailed estimate (reference 2) indicating this would require a nine (9) month effort, we have worked with our fuel vendor, Exxon Nuclear, to develop a compressed schedule which provides for submittal within the time constraints delineated in reference 1.

Reference 1 also included a safety evaluation report (SER) prepared by NRC concluding that there is reasonable assurance that the Kewaunee Plant will operate in conformance with the acceptance criteria of 10 CFR 50.46. This SER

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Mr. S. A. Varga  
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was based on the information provided in our letter of April 4, 1985 (reference 3), which described the development of a peaking factor penalty to be applied to Exxon Nuclear Company analysis.

As a result of discussions with your staff on the afternoon of April 29, 1985, we are taking this opportunity to affirm our commitment to operate the Kewaunee Plant with a nuclear heat flux peaking factor penalty of 0.05, and thereby administratively impose a maximum FQ value of 2.23, or the Kewaunee Technical Specification limit, whichever is more restrictive. This penalty will remain in effect until the reanalysis confirming the applicability of K(Z) to Exxon Nuclear fuel is submitted to you as requested in reference 1.

Very truly yours,

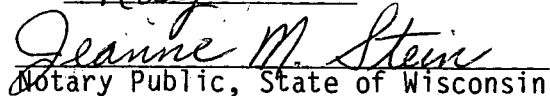


Carl W. Giesler  
Vice President - Power Production

DR/js

cc - Mr. Robert Nelson, US NRC

Subscribed and Sworn to  
Before Me This 3rd Day  
of May 1985

  
Notary Public, State of Wisconsin

My Commission Expires:  
June 28, 1987