

# REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305  
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 HINTZ, D. C. Wisconsin Public Service Corp.  
 RECIP. NAME RECIPIENT AFFILIATION  
 LEAR, G. E. PWR Project Directorate 1

SUBJECT: Informs that mods not made to acoustic monitor sys during  
 1986 refueling outage due to heavy workload, per NUREG-0737,  
 Item II. D. 3 requirements. Equipment not within scope of  
 10CFR50.49 installed.

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 TITLE: OR Submittal: TMI Action Plan Rgmt NUREG-0737 & NUREG-0660

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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April 4, 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  
Status of NUREG-0737 Item II.D.3, Safety and  
Relief Valve Position Indication

- References:
- 1) Letter to S. A. Varga (NRC) from C. W. Giesler (WPSC) Response for additional information on TMI items, dated August 2, 1982.
  - 2) Letter to C. W. Giesler (WPSC) from S. A. Varga (NRC) transmitting SER/TER, dated February 2, 1983.
  - 3) Letter to S. A. Varga (NRC) from C. W. Giesler (WPSC), transmitting WPSC response to SER/TER open items, dated April 22, 1983.
  - 4) Letter to S. A. Varga (NRC) from C. W. Giesler (WPSC), transmitting January 20, 1984 meeting minutes, dated March 16, 1984.
  - 5) Letter to C. W. Giesler (WPSC) from S. A. Varga, transmitting final resolution of EQ, dated September 11, 1984.
  - 6) Letter to S. A. Varga (NRC) from D. C. Hintz (WPSC), transmitting additional resolution to items identified in SER/TER, dated April 1, 1985.

In response to NUREG-0578, section 2.1.3.a, WPSC installed acoustical monitors for additional safety valve indication during January of 1980, and upgraded the existing power operated relief valve (PORV) indication during the 1983 refueling outage.

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Reference 1 provided a response for information regarding a number of "TMI action plan items." Therein, we informed you that we had purchased and installed acoustical monitoring equipment which was state of the art at the time with the intent of determining its environmental qualifications using the criteria of the DOR guidelines.

Reference 2 transmitted the Safety Evaluation Report (SER) for the environmental qualification of safety-related electrical equipment at Kewaunee Nuclear Power Plant, along with the Technical Evaluation Report (TER) prepared by NRC's consultant, Franklin Research Center. This SER/TER requested additional information for resolution of certain items among which was the safety valve acoustic monitor indication.

Reference 3 provided our reply to the items identified in the SER/TER. We noted that although we were participating in an environmental qualification program for the acoustic monitor system, it was our contention that this equipment was incorrectly categorized as II.A and that the appropriate category was III.A(1).

The results of our January 20, 1984 meeting between WPSC engineers and members of your staff were summarized in reference 4. The resolutions agreed upon were enumerated. We identified the acoustic monitor as outside the scope of 10 CFR 50.49, but qualified based on a preliminary review of the results of the test program which we were sponsoring. We further stated that we would review control room instrumentation as part of our Regulatory Guide 1.97 effort and qualify instrumentation that was identified as category I and II in accordance with 10 CFR 50.49.

Reference 5 transmitted NRC's "final resolution of environmental qualification of electric equipment important to safety," and concurred with our approach as described in reference 4. WPSC provided an update in reference 6 regarding certain items identified for resolution in the previous submittals. We pointed out that although the qualification test program for the acoustic monitor system was successful, some field modifications would be required to bring the as-installed configuration into conformance with that described in the final test report. Based on our best estimate at that time, we indicated that the modifications could possibly be made during the 1986 refueling outage.

Our final engineering evaluation of the modification proved to be somewhat less optimistic and resulted in an estimate of 500 electrician hours. The extensive workload encountered during the 1986 outage (which includes Appendix R modifications and installation of inadequate core cooling instrumentation) precludes us from making the modifications to the acoustic monitor system at this time.

We believe our resources would be better spent by considering the qualification upgrade of this instrumentation in conjunction with the category I and II items identified as requiring qualification upgrade by our Regulatory Guide 1.97 review. The benefit of this approach would be to ensure that instrumentation which is important to safety and requiring qualifications would take priority over discretionary improvements in the acoustic monitor instrumentation.

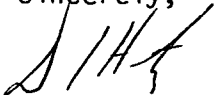
In summary: We proceeded to promptly install the best acoustic monitor equipment available at the time; this equipment is not within the scope of 10 CFR 50.49; this equipment is category III.A and does not require full qualification;

Mr. G. E. Lear  
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although qualified by test, the as-installed configuration is not in full conformance with that described in the final test report.

Although we have not upgraded the acoustic safety valve position monitor instrumentation during the 1986 outage, we will reconsider upgrading this instrumentation as part of our Regulatory Guide 1.97 review program which is currently in progress.

Sincerely,



D. C. Hintz  
Manager - Nuclear Power

DR/jms

cc - Mr. Robert Nelson, US NRC