

REGULATORY 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 Electric Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 LEAR, G. E. PWR Project Directorate 1

SUBJECT: Responds to B4051B request for post-implementation info on
 reactor inventory tracking sys & updates status of
 commitment re sys input to SPDS.

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WISCONSIN PUBLIC SERVICE CORPORATION

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July 14, 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 #45143
Reactor Inventory Tracking System (RITS)

- References:
- 1) Letter from Mr. S. A. Varga to Mr. C. W. Giesler dated May 18, 1984
 - 2) Letter from Mr. D. C. Hintz to Mr. S. A. Varga dated April 26, 1985
 - 3) Letter from Mr. D. C. Hintz to Mr. S. A. Varga dated March 29, 1985

In accordance with the request contained in reference 1, this letter provides post implementation information on the RITS. Additionally, this letter will update you on the status of our commitment regarding RITS input to the Safety Parameter Display System (SPDS).

The RITS installation was completed during our annual refueling outage which was concluded on April 21, 1986. During this time, all remaining hardware associated with the RITS, which was not previously in place, was installed.

Additionally, WPS undertook the task of replacing the core exit thermocouples in an effort to recover several failed channels. Of the 39 thermocouples, 36 were successfully removed and replaced. Of these 36, three are unreliable and not used as input to RITS or the Subcooling Margin Monitor (SMM). WPS realized a net gain of 5 workable thermocouples.

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In reference 3, we transmitted the revised system description and our system error analysis to you. The RITS was installed in accordance with this description and no functional deviations exist between the installed system and the description.

The error analysis presented the worst expected error under the most severe conditions as well as the expected error under normal operating conditions. The actual error under normal operating conditions (from the startup test) was substantially less than that predicted by the error analysis.

From the startup test we conclude that the system performs in accordance with design expectations and within design error tolerances.

NRC has requested that WPS propose Technical Specifications to govern the availability of the RITS. We decline to propose Technical Specifications at this time for the following reasons:

- °The RITS, which is built to class 1E standards, is not classified by WPS as a safety grade system; i.e., Quality Assurance Type 1.
- °It is not classified as a Regulatory Guide 1.97 key variable using the WPS classification procedure.
- °Unit power reduction due to system unavailability does not enhance the health and safety of the public and in certain situations a power reduction may in fact be detrimental.
- °WPS maintains high standards in its maintenance activities and strives to keep all equipment in a state of readiness.
- °A Technical Specification which requires notification given an out-of-service condition does nothing to improve availability but does divert utility resources from other scheduled work.
- °The system is unique and its reliability, although designed to high standards, is unproven.
- °Risk based Technical Specifications are being developed by the Westinghouse Owners Group and NRC. WPS is participating in these efforts and if technical arguments are made as a result of this work, we will reconsider our position.

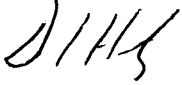
As requested by Reference 1, WPS confirms that plant specific procedures are in place for training and operation of the RITS which conform to the technical content of NRC approved EOP guidelines.

Finally, Reference 2 advised you that WPS was studying the desirability of connecting the RITS, Auxiliary Feedwater Flow, Wide Range Containment Pressure and Containment Sump Level to our SPDS. By this letter we advise you that we have determined that it is desirable to input these parameters to the SPDS. Further, we have implemented the required changes necessary to accomplish this action.

Mr. G. E. Lear
July 14, 1986
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We trust that the forgoing information is sufficient to resolve your concerns.

Sincerely,

A handwritten signature in dark ink, appearing to be 'DCH' or similar, written over the word 'Sincerely,'.

D. C. Hintz
Manager - Nuclear Power

DWS/jms

cc - Mr. Robert Nelson, US NRC