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 AUTH. NAME AUTHOR AFFILIATION
 HINTZ, D. C. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards Rev 1 to "Evaluation of RCS for Reduction of Steam Generator Support Snubbers," for review & approval to proceed w/hardware mods. NRC position that snubber reduction unrelated safety question opposed.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

November 20, 1987

10 CFR 50 Appendix A

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Steam Generator Snubber Reduction

Reference: 1) Summary of Meeting of July 7, 1987 by Mr. T. R. Quay
dated July 21, 1987

On July 7, 1987 WPSC met with NRC to discuss our analytical approach to reduce the number of steam generator upper lateral support snubbers from four (4) to one (1) on each of two steam generators at the Kewaunee Nuclear Power Plant. On July 21, 1987 (Reference 1) WPSC was informed that the methodology presented at that meeting was acceptable to the NRC staff.

On November 13, 1987 WPSC met with you to present analytical results and, to discuss the need for NRC review and approval of the program results prior to hardware modification. The prior review issue arises solely because of the Commission's response to Issue 11 (52 FR 41291) in the Issues Analysis section of the final GDC4 rule change. Specifically, "... removal of a pipe whip restraint which also serves as a seismic restraint would not be a 'simple' removal of a pipe whip restraint and, therefore, would involve an unreviewed safety question."

Although we have attached the summary report of this analysis to this letter for your review and approval, we disagree that the snubber reduction is an unreviewed safety question. Our conclusion is based on application of the three criteria in 10 CFR 50.59(a)(2). Furthermore, complete removal of the snubbers is not within the scope of this project; therefore, the seismic capacity of the steam generator upper lateral support remains sufficient for the dynamic seismic loads. The reduced capacity of the support is achieved only by utilizing Leak Before Break (LBB) technology and elimination of Arbitrary Intermediate Breaks (AIB) as allowed by section 3.6.2 of the Standard Review Plan.

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Since the seismic capacity of the support is sufficient and complete removal of the support is not within the project scope, this change should be viewed as a 'simple' change (i.e., a capacity reduction rather than restraint removal) under the provisions of the Issue 11 wording, and no prior review should be necessary.

Notwithstanding the arguments presented above, we are seeking your review of the attached summary report and approval to proceed with hardware modifications. We are seeking approval by December 31, 1987 in order to aid in the planning of our March 4, 1988 refueling outage.

Enclosed is an application fee of \$150.00 in accordance with the provisions of 10CFR170.

Sincerely,



D. C. Hintz
Vice President - Nuclear Power

DWS/jms

Attach.

cc - Mr. Robert Nelson, US NRC
US NRC, Region III