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SUBJECT: Responds to Generic Ltr 87-02 re seismic verification
 schedule for resolution of USI A-46.

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 TITLE: 87-02 & 87-02 Supplement, Fastener Testing to Determine Conformance w/

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September 30, 1988

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
Seismic Verification Schedule in Response to Generic Letter 87-02

References: 1) Letter from L. C. Shao (NRC) to N. P. Smith (SQUG) dated
July 29, 1988
2) Letter from N. P. Smith (SQUG) to L. C. Shao (NRC) dated
August 19, 1988

On July 29, 1988, the Nuclear Regulatory Commission (NRC) staff issued a Safety Evaluation Report (SER) (reference 1) on Revision 0 of the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment. This procedure was developed by the Seismic Qualification Utility Group (SQUG) in response to NRC Unresolved Safety Issue (USI) A-46. Reference 1 also requested that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. By letter dated August 19, 1988 (reference 2), SQUG clarified that the sixty days would expire on October 7, 1988. In accordance with the NRC's request, this letter provides the implementation schedule for the resolution of USI A-46 at the Kewaunee Nuclear Power Plant (KNPP).

As a member of SQUG and the Electric Power Research Institute, Wisconsin Public Service Corporation (WPSC) has supported the many efforts which contributed to the development of the GIP. The NRC SER endorses the methodology and criteria embodied in Revision 0 of the GIP, subject to satisfactory resolution of a number of open issues and NRC comments. Action by SQUG and its contractors is underway to resolve the identified open issues and comments in accordance with the schedule included with the SQUG letter to the NRC dated August 19, 1988 (reference 2). Although contingent upon SQUG and NRC agreement on the resolution of the various open issues, this schedule projects completion of Revision 2

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of the GIP in Spring, 1989. Revision 2 of the GIP is the version which is scheduled to contain all of the information and guidance necessary for resolution of the USI A-46 issue at SQUG member plants. The final NRC SER Supplement on Revision 2 of the GIP is anticipated by mid-1989.

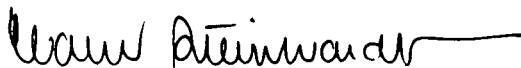
WPSC's plans for implementation of the GIP at the KNPP are necessarily preliminary given the current status of and schedule for completion of Revision 2 of the GIP and NRC's SER Supplement on that revision. Nevertheless, WPSC currently plans on commencing the KNPP walkdown during the 1991 refueling outage. It is anticipated that the walkdown would then be completed by the end of the 1992 refueling outage. These outages are currently planned for the spring of their respective years. Identification of safe shutdown equipment, gathering of necessary plant-specific data, and training of walkdown team members will be initiated prior to these outages. This schedule is based on the following assumptions:

- 1) The final NRC SER Supplement is issued by June, 1989 with no open items.
- 2) The scope of the final revision of the GIP will not change significantly from WPSC's current understanding of the GIP.
- 3) WPSC's implementation plan is based on the "SQUG Commitments" identified in each section of the GIP.

Any occurrence which affects these assumptions could adversely impact WPSC's schedule by delaying the plant walkdown and/or other related activities.

In addition, WPSC is considering the possible integration of the resolution of USI A-46 with the resolution of numerous other related seismic issues (e.g., Eastern Seismicity, Seismic Margins, and Severe Accident Individual Plant External Event Evaluations). In view of the uncertainties in the requirements and schedule for resolution of these related issues, WPSC may choose to revise the implementation schedule for USI A-46 at the KNPP in order to integrate these potential future requirements into a single, cost-effective program. This possibility has been the subject of on-going discussions between SQUG and the NRC staff and further discussions are planned. WPSC will advise you in writing of any changes in our implementation plans and schedules.

Sincerely,



C. R. Steinhardt
Manager - Nuclear Power

KAH/jms

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