

Docket No. 50-305

October 2, 1974

Wisconsin Public Services Corporation  
ATTN: Mr. E. W. James  
Senior Vice President  
P. O. Box 1200  
Green Bay, Wisconsin 54305

Gentlemen:

10 CFR 50.46(a)(2)(iv) requires that upon submission of your revised ECCS evaluation, developed in accordance with Appendix K to Part 50, the facility shall continue or commence operation within the limits of both the proposed technical specifications submitted pursuant to Section 50.46 and all technical specifications or license conditions previously imposed by the Commission, including the requirements of the ECCS Interim Policy Statement of June 29, 1971.

Our preliminary review of recent ECCS submittals indicates that there may be instances where the proposed technical specifications that have been submitted in accordance with Section 50.46 are not consistent with the evaluation that has been submitted in accordance with Appendix K, or are in conflict with existing technical specifications for your facility. Further, it appears that in some cases compliance with the limits of both specifications may be a physical impossibility. For example, in some facilities the proposed technical specifications require a greater amount of water in the accumulators than is permitted by your existing technical specifications.

Discrepancies such as those discussed above must be corrected as soon as practicable. Accordingly, you should reexamine your ECCS submittals, including both the existing and proposed technical specifications related thereto, to assure that the facility can be operated within the limits of both sets of technical specifications; that your proposed technical specifications are consistent with 50.46 requirements, including your evaluation showing compliance with Appendix K; and to identify any areas of conflict between the two sets of technical specifications. After this review, you should submit to the Director of Licensing, within thirty days of receipt of this letter, the results of your review and necessary documentation to correct any discrepancies in your previous ECCS submittals and to remove any conflicts in technical specifications similar to those discussed above.

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In the interim, pending resolution of such technical non-compliance with the Commission's regulations, your facility should be operated within the limits of those technical specifications that have been shown to result in compliance with the Interim Acceptance Criteria and, in addition, within the limits of any proposed technical specifications submitted pursuant to 50.46, to the extent that those proposed technical specifications have been shown to be consistent with the Interim Acceptance Criteria and provide a greater margin of safety.

Sincerely,

Original Signed by  
Karl Goller

Karl R. Goller, Assistant Director  
for Operating Reactors  
Directorate of Licensing

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Foley, Sammond & Lardner  
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*OGC (Gallo)  
continued (see quina etc)*

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