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SUBJECT: Proposed amend 110 for license DPR-43, changing Basis & Table of Spec 3.5 & 4.1 re basis, instrument setting limits & table notes associated w/degraded grid voltage channel of safeguard bus second level indervoltage instrumentation.

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August 20, 1992

10 CFR 50.90

U. S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 110 to the Kewaunee Nuclear
Power Plant Technical Specifications

This proposed amendment (PA) to the Kewaunee Technical Specifications (TS) is being submitted to incorporate changes to the Basis and referenced Tables of Specifications 3.5, Instrumentation System and 4.1, Operational Safety Review. The proposed changes revise the basis, instrument setting limits, and table notes associated with the degraded grid voltage channel of the safeguards bus second level undervoltage instrumentation.

Changes to make the setting limits more restrictive and changes to the associated circuitry were necessitated when a self-initiated safety system functional inspection identified an incorrect assumption in the design basis of the degraded grid voltage circuitry. This deficiency, and the associated short and long term corrective actions, were previously reported in Licensee Event Report (LER) 91-002-00, dated March 20, 1991, and LER 91-002-01, dated March 27, 1992. The resulting plant modifications, supporting calculations, and procedures were reviewed by NRC staff during the Electrical Distribution Safety Functional Inspection conducted at the Kewaunee Nuclear Power Plant on March 30 through May 1, 1992.

Attachment 1 to this letter contains a description, a safety evaluation, a significant hazards determination and environmental consideration for the proposed changes. Attachment 2 contains the affected TS pages. TS Section 3.5 and Tables TS 3.5-1, TS 3.5-3, TS 3.5-5, and TS 4.1-1

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are being submitted in their entirety due to our conversion of the TS to the WordPerfect software. The administrative changes to Section 3.5 and Table TS 4.1-1 reflected in this PA were previously submitted in PA 98. The technical changes associated with PA 98 are not included with this submittal.

In accordance with the requirements of 10 CFR 50.30(b), this submittal has been signed and notarized. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

Sincerely,

C. R. Steinhardt
Senior Vice President-Nuclear Power

VJC/jac

Attach.

cc - US NRC - Region III
Mr. Patrick Castleman, US NRC
Mr. R. S. Cullen, PSCW

Subscribed and Sworn to
Before Me This 20th Day
of August 1992

Notary Public, State of Wisconsin

My Commission Expires:
June 18, 1995

LIC\NRC\PA110.WP

ATTACHMENT 1

To

Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC)

Dated

August 20, 1992

PROPOSED TS AMENDMENT NO. 110

Introduction
Description of Proposed Changes
Safety Evaluation
Significant Hazards Determination
Environmental Consideration

Introduction

This proposed amendment to the Kewaunee Technical Specifications (TS) is being submitted to incorporate changes to Table TS 3.5-1, Table TS 3.5-3, Table TS 3.5-5, Table TS 4.1-1, and the TS 3.5 basis section associated with the degraded grid voltage protection system. Changes to the setting limits and associated circuitry were necessitated when a self-initiated safety system functional inspection identified an incorrect assumption in the design basis of the degraded grid voltage circuitry.

The undervoltage protection system is designed to isolate the safeguards 4160 volt (V) buses from their normal offsite power supplies during loss of voltage or degraded grid conditions. Once isolated, the safeguards buses are loaded onto their respective diesel generator if an alternate offsite source is not available. The undervoltage protection system has two undervoltage trips of the bus. These trips are designed to prevent operation of safeguard equipment at voltages that could adversely affect operability of the equipment.

The primary undervoltage trip at 85% plus or minus 2% of nominal voltage (for 2.5 seconds or less), is designed to protect against a loss of voltage to the buses. The setting limit accounts for distribution system losses and ensures that equipment connected to the bus will not be operated below 80% of rated voltage. The associated time delay prevents unnecessary actuations of the

undervoltage trip (due to temporary bus disruptions) while ensuring protective actions proceed as described in the Kewaunee Updated Safety Analysis Report (USAR).

The second level undervoltage trip is designed to protect against long term operation of safeguard equipment during a degraded grid condition. A setting limit of 92.5% plus or minus 2% of nominal voltage (for 5 minutes or less) is currently specified. This limit accounted for distribution system losses and prevented operation of safeguard equipment below 90% of its rated voltage for more than five minutes. The design analysis used to determine the current TS setting limit concluded that operation of safeguard motors at voltages between 80% and 90% of rated voltage for up to five minutes was acceptable due to their associated service factors and conservative insulation design. The five minute time delay limitation was intended to allow operator action and mitigation during degraded grid conditions. Actuation of either of two degraded voltage relays in the channel circuitry would annunciate a common alarm to notify the operator of the degraded grid voltage.

Design Inadequacy Noted During Self-Initiated Safety System Functional Inspection

In February of 1991, a self-initiated Safety System Functional Inspection (SSFI) identified that the second level undervoltage protection was not in compliance with the USAR design basis due to a previous inadequate design evaluation. The design deficiency and subsequent corrective actions were reported in Licensee Event Report (LER) 91-002-00, dated March 20, 1991, and

LER 91-002-01, dated March 27, 1992. As reported in the LERs, modifications were implemented to the circuitry to assure operation within the assumptions of the design basis.

All changes to the instrumentation circuitry and setpoints to respond to the SSFI finding were performed to assure continued operation in accordance with the current Kewaunee TS.

The purpose of this proposed amendment is to revise the TS to accurately reflect the existing plant configuration and more restrictive setting limits necessary for assuring operation within the constraints of the design basis.

The modifications, procedures, and supporting design calculations were reviewed in detail by NRC staff during the recent Electrical Distribution System Functional Inspection.

Description of Changes to Technical Specifications (TS) Referenced Tables

A number of changes are being proposed for Table TS 3.5-1, Table TS 3.5-3, Table TS 3.5-5, and Table TS 4.1-1 to incorporate the changes discussed above, correct an erroneous description of the circuit configuration, and propose more restrictive surveillance requirements. Specifically, these changes are as follows:

1) The setting limit for the degraded grid voltage channel of the safeguards bus second level undervoltage instrumentation is being changed. The current limit of Table TS 3.5-1 is 92.5% plus or minus 2% of nominal bus voltage. This limit is being changed to 93.6% plus or minus a more restrictive tolerance of 0.9% of nominal bus voltage.

2) The time delay associated with the degraded grid voltage channel of the safeguards bus second level undervoltage instrumentation is being changed. The current time delay of Table TS 3.5-1 is less than or equal to five minutes. This limit is being changed to less than or equal to 7.4 seconds.

3) Note (4) of Table TS 3.5-1 is being changed. The note currently references the FSAR. This reference is being changed to the USAR.

4) Note (*) of Table TS 3.5-3 is being changed. The note contains a typographical error and omits the word "delay" in referencing a time delay relay. The typographical error is being corrected. The omitted word is being added.

5) Note (3) of Table TS 3.5-5 is being changed. The note describes the circuit configuration of the degraded grid voltage channel of the safeguards bus second level undervoltage instrumentation. The note is being changed to correct an erroneous description of the circuit configuration that has existed since the TS was approved. The

note is also being change to reflect the elimination of a time delay relay from the circuitry.

6) The test frequency for surveillance testing of the degraded grid voltage channel is being changed. Table TS 4.1-1 currently requires testing on a refueling outage. This test frequency is being changed to require monthly testing of the circuitry.

7) Concurrent with these technical changes, TS Section 3.5, Table TS 3.5-1, Table TS 3.5-3, Table TS 3.5-5, and Table TS 4.1-1 are being revised to the WordPerfect format, and

8) In addition, the basis section is being revised to reflect the above stated technical changes.

A safety evaluation and significant hazards determination for the changes is presented below.

Safety Evaluation for Proposed Technical Changes to Technical Specifications

The design analysis used to determine the current TS setting limits assumed that the voltage requirements for the continued operation of the safeguards motors were the limiting component condition for the second level undervoltage trip circuitry. As described in LER 91-002-00, the SSFI identified a condition (i.e. a degraded grid coincident with a safety injection signal),

wherein the limiting equipment for analysis of voltage requirements was the 480 V Motor Control Center (MCC) contactors and associated control circuit fuses.

The SSFI identified a concern with the contactors for the 460V motors fed by 480V MCCs when it was discovered that the manufacturer's minimum recommended voltage for reliable operation of the contactors was 85% of rated voltage. Since the second level undervoltage trip setpoint could allow operation at 80% of the motor's rated voltage for up to five minutes, there may have been insufficient voltage to actuate the motor contactors if a safety injection signal would occur during the degraded grid condition.

A secondary concern identified was that if the motor contactors had failed to actuate under these conditions, the fuse in the contactor circuitry could have been exposed to actuation (in-rush) currents for up to five minutes. Under this condition it is probable that the fuses in the circuit would blow and preclude subsequent motor contactor actuation when adequate bus voltage was restored.

During the design analysis used to determine the current TS setting limits, the operability of the control circuitry for the MCC supplied safeguard equipment motors was addressed. As noted in LER 91-002-00, this design did not adequately address contactor operation or the potential for control circuit fuses to be exposed to high currents for long durations of time. As reported in the LER, the immediate corrective action reduced the circuit actuation time to six seconds by

eliminating a time delay relay from the circuitry. The revised circuit actuation time ensured engineered safeguards equipment would operate within the assumptions of the accident analyses and motor contactor control circuit fuses would not lose continuity if a degraded grid condition should occur.

LER 91-002-00 also reported that as long term corrective action, the undervoltage protection system would be evaluated to determine a setpoint and time delay that would minimize inadvertent actuations while ensuring that protective actions would proceed as described in the Kewaunee USAR. A status report on the long term corrective actions was submitted in LER 91-002-01, dated March 27, 1992. This LER reported the revision to the nominal degraded grid undervoltage relay setpoints, and the status of other modifications to enhance operating characteristics.

Changes to Setpoint

As noted above, the voltage requirements of the MCC contactors and associated control circuitry are the limiting equipment considerations for determiming undervoltage setting limits. Proper operation of these contactors will be assured as long as 414V or greater is maintained at the MCC's.

The DAPPER code (a computer model of the electrical distribution system at Kewaunee Nuclear Power Plant) was used to calculate the undervoltage relay setpoint required to maintain 414V at the most limiting MCC. The calculated setpoint was increased to allow margin for voltage drops from the MCCs to individual motors, and to prevent operation below 414V even with instrument drift between calibrations.

Based on these calculations, the setpoint was increased to 93.6% of nominal 4160V bus voltage, with a more restrictive tolerance of plus or minus 0.9% This tolerance ensures 414V or greater is maintained within the entire band of the revised setting limits. The revised setting limits ensure operation of safeguards equipment motor contactors during degraded grid conditions. The revised setpoint and setting limits are bounded by the limits of the existing TS. The revised setting limits are necessary to assure operation of the facility in accordance with the design basis assumptions of the Kewaunee USAR.

Changes to Time Delay Setting Limits

The re-analysis confirmed that the safeguards motors would function for five minutes under degraded grid conditions and that the control circuit fuses in the motor contactor circuitry would maintain continuity for 20 seconds or more when exposed to inrush currents. Since the operation of safeguards motor contactors at voltages between the degraded grid undervoltage (UV) trip setpoint (93.6%) and the primary UV trip setpoint (85%) can not be assured, the

analysis concluded the limiting consideration for circuit design was the operation of the safeguards motor contactors. At voltages less than the degraded grid UV trip, the safeguards motor contactors and associated safeguards equipment cannot be assumed to operate during the duration allowed by the degraded grid UV relay time delay. The limitmg condition for establishing the maximum allowable time delay is therefore predicated on the time delays assumed in the USAR accident analyses.

The maximum allowable time delay was determined by evaluation of various degraded grid and accident scenarios and bounded by the assumptions of the accident analyses in the USAR. For the USAR accident analyses, two assumptions are made that affect the allowable time delay for the degraded grid relays. First, a loss of offsite power (either by loss of voltage or by degraded voltage) is assumed concurrent with the accident. Secondly, the diesel generator startup time delay is included in the time delay assumed for engineered safeguards equipment to operate.

To preserve the assumptions of the accident analyses, the maximum allowable time delay was determined through an evaluation of time delays associated with accidents that require safety injection and accidents that do not require safety injection. A brief description of system operation under degraded grid non-accident conditions is also provided for clarity.

Normal System Operation With Degraded Grid Condition

In the event of a degraded grid voltage condition less than the setpoint of the safeguards bus second level undervoltage trip (but greater than the setpoint of the primary safeguards bus undervoltage trip), the following actions occur concurrently when the setting limit of the time delay relay is reached:

1. the safeguards bus is isolated
2. voltage restoring circuitry is initiated,
3. a diesel start signal occurs.

The voltage restoring circuitry begins a search sequence for an alternate supply with acceptable voltage. The safeguards bus is aligned to the first acceptable supply found. The voltage restoring circuitry sequentially examines the voltage on the alternate supply and then the normal supply for the bus. If acceptable voltage does not exist on either supply, the bus is aligned to the diesel generator.

Degraded Grid Condition Concurrent With Accident Requiring Safety Injection

If a safety injection (SI) signal were to occur concurrent with the degraded grid condition, the diesel generator would receive an immediate SI start signal and come up to rated voltage and

speed within ten seconds. The safeguards bus, however, would remain connected to its normal power supply and would not isolate until the undervoltage time delay relay has timed out.

As discussed above, the voltage restoring circuitry would search for an alternate supply source with acceptable voltage prior to loading the bus to the diesel generator.

Due to motor contactor voltage limitations, operation of safeguards equipment cannot be assumed until the bus is isolated and then loaded onto an acceptable supply source.

For a degraded grid condition concurrent with an accident resulting in SI, the assumptions of the accident analyses are preserved provided that the safeguards bus is isolated and ready to load to the diesel within ten seconds of the time that the degraded condition occurs.

The maximum allowable time delay limitation is calculated such that its duration, plus instrument drift and the actuation time of the associated voltage restoring circuitry (up to and including closure of the diesel output breaker) remains less than the ten second diesel starting time assumed in the accident analyses.

Degraded Grid Condition Concurrent With Accident Not Requiring Safety Injection

The existing analyses for accidents not requiring safety injection assume a concurrent loss of all offsite power. Under these analyses, a diesel start signal occurs almost immediately (i.e. when the safeguards bus primary undervoltage trip occurs).

Under degraded grid conditions concurrent with an accident not requiring safety injection, the diesel start signal is not generated until the degraded grid UV time delay limit is reached. Since operation of the safeguards motor contactors at degraded voltages is not proven, the associated safeguards equipment cannot be assumed to operate during the duration allowed by the UV time delay. This effectively delays the operation of the safeguards equipment assumed in the accident analyses by the duration of the time delay.

The only non-SI initiatmg accident time delay assumption in the USAR analyses is associated with the loss of normal feedwater accident. This accident scenario assumes start of an auxiliary feedwater (AFW) pump one minute after the initiation of the steam generator low-low level trip. The AFW pump is started at step six of the diesel generator blackout sequence, which is less than or equal to 45 seconds after diesel generator start signal.

This accident assumption is preserved provided that the time delay plus the actuation times of the diesel start and blackout sequence (up to starting of the AFW pump) remain less than one

minute. The diesel generator start signal must be initiated within 15 seconds of the occurrence of degraded grid condition concurrent with the non-SI initiating accident.

Therefore, it is concluded that the degraded grid condition concurrent with an accident requiring SI is the bounding accident for calculating the maximum allowable degraded grid UV time delay.

Summary of Changes to Time Delay

As noted in the LERs, immediate corrective action was taken to eliminate a time delay relay from the channel circuitry and set the remaining time delay relays at six seconds. Additional engineering evaluation has determined that a time delay of less than or equal to 7.4 seconds is acceptable. The changes being proposed for the TS incorporate this time delay setting limit. The time delay relay limitation of 7.4 seconds is bounded by the current TS requirement of less than five minutes. This setting limit represents a significantly more restrictive operating condition than specified in the existing TS. This setting limit is required to assure safeguards equipment operates as assumed in the accident analyses.

The time delay feature is of sufficient duration to prevent inadvertent actuation of the second level UV relays from voltage dips due to large motor starts with one exception. Analysis and test results conclude that a Reactor Coolant Pump (RXCP) start (when initial safeguards bus voltage is less than 95.6% of nominal voltage or 3980V), may result in actuation of the second

level undervoltage trip. Both the grid and safeguards bus voltages at Kewaunee are normally maintained very near, or above nominal voltage. Starts of RXCPs are infrequent. Although the probability of a degraded voltage condition occurring concurrent with a RXCP start is extremely unlikely, WPSC has implemented administrative controls cautioning against starting RXCPs when low voltage exists on safeguards buses.

The removal of the time delay relay essentially eliminated the design feature that allowed for operator action to restore bus voltage. The removal of the time delay effectively changed the common alarm on the degraded voltage relays from a warning to an indication of the cause of actuation of the automatic voltage restoring scheme. Allowing time for operator action was not a regulatory or design basis requirement for mitigating degraded grid conditions. Elimination of this feature did not conflict with the design basis or violate the TS.

Changes to Description of Circuit Configuration

Existing TS Table 3.5-5 Note (3) provides a textual description of the safeguards bus second level undervoltage circuitry. Prior to removing the time delay relay from the circuit, technical reviews for the modification recognized that the existing description of the circuitry contained in the table note was in error when compared to the existing circuit configuration in the plant. Further review determined this error had existed since the TS was approved. The existing textual note states:

"Each channel has 2 time delay relays in parallel which are in series with a third time delay relay."

The actual circuit configuration that existed prior to the modification could more accurately be described as "two time delayed relays in series with a third time delay relay".

This information was reflected in the table note to define what circuitry comprised a channel, and the configuration of the relays in the channel logic. It is believed that this description was intended to provide understanding of the circuit configuration that resulted in the annual surveillance frequency designated in TS Table 4.1-1. Under the existing design, testing of the third relay during operation would have either caused a transfer to the safeguards bus, or required disabling of the degraded grid UV protection during the performance of the testing.

The modification required to resolve the design deficiency was to eliminate the "third time delay relay" configured in series with the other two relays referenced in the note. Removal of this third relay eliminated a component from the circuit and resulted in a more reliable circuit configuration, with less failure modes. Removal of this common relay allowed for surveillance testing of the remaining two relays during power operation. Additionally, removal of this third relay resulted in the reduced response time necessary to preserve the assumptions of the revised design analysis.

The note is being revised to accurately reflect the current circuit configuration.

Changes to Surveillance Test Frequency

The surveillance frequency for testing the degraded grid undervoltage relays is being revised from a refueling outage requirement, to require monthly testing of the relays.

The circuit configuration that existed prior to the removal of the third time delay relay was tested each refueling outage. Testing of the circuit during operation would cause a transfer of the safeguards bus. Disabling of the circuit for testing was not desired since this would remove all second level undervoltage protection.

The more frequent surveillance testing allowed by the revised circuit configuration is bounded by the existing TS requirement for testing each refueling outage. The removal of the time delay relay allows the performance of surveillance testing during power operation as recommended by Branch Technical Position PSB-1, "Adequacy of Station Electric Distribution System Voltages," B.1.c.5. Monthly surveillance testing of the remaining two relays in each channel is now being performed.

Changes to Technical Specification 3.5, Basis

The existing TS bases for the degraded grid circuitry reflected the assumptions and circuit configuration of the original design. As a result of the SSFI, the limiting characteristics of the design are the voltage limitations for operation of the motor starting contactor and control circuitry and the assumptions of the USAR analyses. The introduction and safety evaluation contain supporting detail for the changes to the basis section.

Significant Hazards Determination for Proposed Technical Changes to Technical Specifications

The proposed changes were reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed change will not:

1) involve a significant increase in the probability or consequences of an accident previously evaluated.

The probability of an accident previously evaluated is not increased by this TS change. The degraded grid voltage circuitry is designed to detect a degraded voltage condition at the required setpoint and initiate a bus transfer to an alternate supply source. The revision to the setting limits of the circuitry assures the operation of safeguards

equipment occurs as assumed in the accident analyses. The probability of an accident occurring is independent of the operability of the circuitry. The changes being made do not affect any structure, system, or component that initiates an accident analyzed in the USAR.

The consequences of an accident previously evaluated will not be increased by this TS change. The change to the setting limits and circuitry ensures the operability of safeguards equipment under degraded grid conditions as assumed in the accident analyses. The configuration of safeguards equipment used to mitigate the consequences of accidents previously evaluated will not change.

The proposed changes do not revise any equipment requirements or existing plant parameters required to provide undervoltage protection. The removal of one time delay relay from the undervoltage protection circuitry results in a simplified circuit configuration with decreased probability of failure. The more frequent surveillance testing of the revised circuit configuration provides additional assurance of reliability.

Therefore the proposed changes do not increase the probability or consequences of accidents previously analyzed.

2) create the possibility of a new or different kind of accident from any accident previously evaluated.

A new or different kind of accident from those previously evaluated will not be created by this TS change. The proposed changes do not change the operation, function or modes of plant or equipment operation. The ability of the degraded voltage protection circuitry to detect degraded voltage and initiate a bus transfer is maintained. The proposed changes reflect the necessary constraints on setting limits to ensure operation of the plant will continue within the limits of the existing accident analyses and margins of safety.

3) involve a significant reduction in the margin of safety.

The margin of safety will not be reduced by this TS change. These changes revise the current specifications to reflect the more restrictive setting limits necessary to assure safeguards equipment will operate as assumed in the accident analyses. The ability of the degraded voltage circuitry to perform its detection and actuation function is confirmed by existing surveillance requirements. The associated safeguards bus configuration is not changed.

Safety Evaluation for Proposed Administrative Changes to Technical Specifications

A number of formatting changes and correction of minor typographical errors are being included with this proposed TS change. These changes are being proposed in conjunction with converting the TS document over to the WordPerfect software now being used at WPSC for word processing. Among these changes are renumbering the footnotes and boxing in the tables to give the specification a neater appearance. These changes have been reviewed to ensure that they do not alter the intent or interpretation of the specifications; therefore, there is no effect on public health or safety.

Significant Hazards Determination for Proposed Administrative Changes to Technical Specifications

The proposed change was reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed change will not:

1) involve a significant increase in the probability or consequences of an accident previously evaluated, or

2) create the possibility of a new or different kind of accident from any accident previously evaluated, or

3) involve a significant reduction in the margin of safety.

The proposed changes are administrative in nature and do not alter the intent or interpretation of the TS. Therefore, no significant hazards exist.

Additionally, the proposed change is similar to example C.2.e(i) in 51 FR 7751. Example C.2.e(i) states that changes which are purely administrative in nature; i.e. to achieve consistency throughout the technical specifications, correct an error, or a change in nomenclature, are not likely to involve a significant hazard.

Environmental Considerations

This proposed amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR part 20, or a change to a surveillance requirement. WPSC has determined that the proposed amendment involves no significant hazards considerations and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, this proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this proposed amendment.