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 STEINHARDT, C. R. Wisconsin Public Service Corp.
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 Document Control Branch (Document Control Desk)

SUBJECT: Proposed amend (PA) 115 for license DPR-43, reflecting
 organizational changes & incorporating proposed changes from
 PA 103, except section 6.9 & PA 104 entirely.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

August 31, 1992

10 CFR 50.90

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 115 to the Kewaunee Nuclear
Power Plant (KNPP) Technical Specifications

- References:
- 1) Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated June 28, 1991 transmitting Proposed Amendment 103 to the KNPP Technical Specifications
 - 2) Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated November 20, 1991 withdrawing administrative changes submitted with Proposed Amendment 103 to the KNPP Technical Specifications
 - 3) Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated November 20, 1991 transmitting Proposed Amendment 104 to the KNPP Technical Specifications

Reference 1 was submitted to propose the following changes to the Kewaunee Technical Specifications:

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ADD 1

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- 1) add TS 1.0.q to the KNPP Technical Specifications to define Dose Equivalent I-131;
- 2) revise TS Section 3.1.c to incorporate a limitation on reactor coolant system Dose Equivalent I-131;
- 3) revise TS 6.9 to specify the annual reporting requirements for primary coolant iodine spiking and to correct the address for the submittal of the monthly operating report;
- 4) revise TS 6.13 "High Radiation Area" to be similar to NUREG-0452 "Standard Technical Specifications for Westinghouse Pressurized Water Reactors"; and
- 5) revise TS 6.4 and TS 6.5 due to organizational changes.

In addition, the entire Section 6 was submitted, converting the section to the Word Perfect format.

Reference 2 withdrew the proposed changes to TS 6.4 and TS 6.5 as a result of organizational changes at WPSC. Reference 3 was submitted to reflect the new organizational changes.

Due to additional organizational changes, it is necessary to submit the attached Proposed Amendment (PA) 115. In an effort to avoid several proposed amendments affecting Section 6 awaiting NRC review and approval, WPSC requests to withdraw Section 6 of PA 103 with the exception of Section 6.9, and PA 104 in its entirety. This request was discussed in a conversation with our NRC Project Manager, Mr. Allen Hansen, on August 5, 1992.

The changes proposed in PA 103 with the exception of Section 6.9, and the changes proposed in PA 104 have been incorporated into the attached PA 115. Additional changes being proposed at this time which had not been incorporated into PA 103 or 104 affect TS 6.5.b.2, Corporate Support Staff.

Attachment 1 to this letter contains a description, a safety evaluation, a significant hazards determination, and an environmental consideration for the proposed changes. Attachment 2 contains the affected TS section.

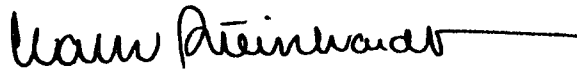
In accordance with the requirements of 10 CFR 50.30(b), this submittal has been signed and notarized. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

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Sincerely,




C. R. Steinhardt
Senior Vice President - Nuclear Power

BJD/jac

Attach.

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

Subscribed and Sworn to
Before Me This 31st Day
of August 1992


Notary Public, State of Wisconsin

My Commission Expires:

June 18, 1995

LIC\NRC\PA115

ATTACHMENT 1

TO

Letter from C. R. Steinhardt (WPSC)

to

Document Control Desk (NRC)

Dated

August 31, 1992

PROPOSED TS AMENDMENT NO. 115

Description of Change, Safety Evaluation,

Significant Hazards Determination, and

Environmental Consideration

INTRODUCTION

To assist the reviewers, the changes included in Proposed Amendment (PA) 115 to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS) have been classified as either organizational changes, administrative and formatting changes, or changes to Section 6.13, "High Radiation Area." Each of these categories, which are addressed below, contain a description of the change, a safety evaluation, and a significant hazards determination.

I) Organizational Changes

Based on organizational changes within the Nuclear organization at Wisconsin Public Service Corporation (WPSC), changes are being proposed to maintain the accuracy of the TS's. In summary, these changes are as follows:

The Senior Vice President - Nuclear Power will now have four persons reporting directly to him.

1. Manager - Kewaunee Plant

Previously, the Manager - Kewaunee Plant reported to the Manager - Nuclear Power. This change in reporting structure reduces the levels of management between the Plant and the Senior Vice President - Nuclear Power, improving communication and increasing involvement of the Senior Vice President - Nuclear Power in the day-to-day operations of the plant. Reassignments have been made to allow the Manager - Kewaunee Plant to focus on plant operating activities.

2. Manager - Nuclear Plant Support Services

The current Manager - Nuclear Power has assumed a new position entitled Manager - Nuclear Plant Support Services, located at the KNPP. Reporting to this position are the Superintendent - Nuclear Computer Systems, the Superintendent - Nuclear Training, the Superintendent - Plant Quality Programs, the Security Director, and the Nuclear Personnel Supervisor. This change reduces the responsibilities of the Manager - Kewaunee Plant which are not strictly associated with plant operations, allowing him to concentrate more on plant day-to-day operations.

3. Manager - Nuclear Engineering

The current Assistant Manager - Plant Operations has relocated to the corporate office as Manager - Nuclear Engineering. This change brings those departments which report to the WPSC corporate offices under a single individual who reports

to the Senior Vice President - Nuclear Power. Specifically, this change consolidates the various engineering departments and self-assessment activities under one manager, thus enhancing communications between departments, which will result in better work coordination between the various organizations.

4. Superintendent - Quality Assurance

There are no changes associated with this position. The Superintendent - Quality Assurance continues to report to the Senior Vice President - Nuclear Power at the corporate office.

Specifically, the changes that affect TS's are as follows:

Description of Proposed Change: TS 6.1

The title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant" in TS 6.1.

The titles "Manager - Kewaunee Plant" and "Plant Manager" are used interchangeably at WPSC. However, in order to avoid confusion and to maintain consistency throughout this document, the title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant".

The title of "Assistant Manager - Plant Services" is being deleted and the title of "Superintendent - Plant Instrument & Control" is being added.

Formerly, the succession of Plant Manager (in the absence of the Plant Manager) included the Assistant Manager - Plant Services. However, this position has been eliminated. The Chemistry and Radiation Protection groups, which formerly reported to this position, now report directly to the Manager - Kewaunee Plant. The Security group now reports to the Manager - Nuclear Plant Support Services.

The Superintendent - Plant Instrument and Control will be designated in the Plant Manager succession in lieu of the Assistant Manager - Plant Services. The position of Superintendent - Plant Instrument and Control meets the requirements of ANSI N18.1-1971.

Description of Proposed Change: TS 6.4

The title of "Training Supervisor" is being changed to "Manager - Nuclear Plant Support Services" in TS 6.4.

The nuclear training department is now under the responsibility of the Manager - Nuclear Plant Support Services. This is a new position developed to reduce the responsibilities of the Manager - Kewaunee Plant which are not strictly associated with plant operations.

Description of Proposed Changes: TS 6.5

The title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant" throughout this section.

The titles "Manager - Kewaunee Plant" and "Plant Manager" are used interchangeably at WPSC. However, in order to avoid confusion and to maintain consistency throughout this document, the title of "Plant Manager" is being replaced with "Manager - Kewaunee Plant".

The required members of the Plant Operating Review Committee (PORC) have been changed to reflect the organizational changes. The list of required members has also been rearranged to appear in the same order as TS 6.1.

The position of Assistant Manager - Plant Services and the position of Superintendent - Plant Information Systems have been deleted from the list of required PORC members and the Superintendent - Plant Radiation Protection has been added. This reduces the number of required PORC members from eight to seven. This reduction of one member presents no safety concern as PORC continues to be composed of representatives from the Maintenance, Instrument & Control, Operations, Radiological Services, and Quality (Quality Control and Inservice Inspections) departments.

The title of "Supervisor - Plant Quality Programs" has been changed to "Superintendent - Plant Quality Programs."

As part of the reorganization, the former "Supervisor - Plant Quality Programs" has been promoted to the position of "Superintendent - Plant Quality Programs".

The title of "Manager - Nuclear Power" is being changed to "Senior Vice President - Nuclear Power."

With the reorganization, the Manager - Kewaunee Plant now reports directly to the Senior Vice President - Nuclear Power. The Senior Vice President - Nuclear Power will be kept informed of PORC activities.

The title of "Manager - Nuclear Power" is being changed to "Manager - Nuclear Engineering".

The Manager - Nuclear Power, as previously stated, has assumed the position of Manager - Nuclear Plant Support Services at the KNPP. The former Assistant Manager - Plant Operations has relocated to the corporate office as the Manager - Nuclear Engineering. This relocation brings those departments which report to the WPSC corporate offices (except for Quality Assurance) under a single individual who reports to the Senior Vice President - Nuclear Power.

Description of Proposed Change: TS 6.6

The title of "Vice President - Nuclear Power" has been changed to "Senior Vice President - Nuclear Power."

This change reflects a title change only. The responsibilities of this position remain the same.

Safety Evaluation for Proposed Changes to TS Section 6 - Organizational Changes

This proposed amendment reflects organizational changes which have been made at Wisconsin Public Service Corporation in order to reduce the layers of management and to provide greater management involvement in the various plant departments.

These proposed amendment changes are necessary to maintain the accuracy of the Technical Specifications and do not change the intent of the existing specifications, or represent a decrease in the engineering, technical, or management support for the Kewaunee Plant. Therefore, they have no safety significance.

Significant Hazards Determination for Proposed Changes to TS Section 6 - Organizational Changes

This proposed amendment reflects organizational changes at Wisconsin Public Service Corporation. These revisions do not change the intent of the Technical Specifications or decrease WPSC's management support or involvement in activities at the Kewaunee Plant.

Therefore, the proposed changes pose no significant hazards for the following reasons:

1. The proposed changes will not result in a significant increase in the probability of occurrence or consequences of an accident.
2. The proposed changes will not create the possibility of a new or different kind of accident from any previously analyzed.
3. The proposed changes will not involve a significant decrease in the margin of safety.

The proposed changes are similar to example C.2.e.i in 51 FR 7751. Example C.2.e.i is given to describe purely administrative changes that are, therefore, not likely to involve a significant hazard.

II) Administrative and Formatting Changes

This proposed amendment converts TS Section 6 to the Word Perfect format and corrects minor typographical errors and format inconsistencies. Among the formatting changes is the renumbering of the existing specifications in a manner consistent with other TS sections. Administrative changes are discussed below.

Description of Proposed Change: TS 6.2.c

The words "that are described in the Technical Specifications" are being added to TS 6.2.c (formerly TS 6.2.3).

This statement clarifies that organizational changes not affecting safety that are described in the Technical Specifications will be reported to the Commission within 60 days of implementation. Organizational changes not affecting safety which are not described in the Technical Specifications will continue to be reported to the Commission by means of the Operational Quality Assurance Program Description at least annually in accordance with 10 CFR 50.54(a)(3).

Description of Proposed Changes: TS 6.5

The words "for required members" have been added to TS 6.5.a.3 (formerly TS 6.5.1.3).

These words have been added to clarify that no more than two alternates for "required" members shall participate in PORC meetings at any one time. Additional alternates for "regular" members may also participate.

TS 6.5.a.5 (formerly TS 6.5.1.5) has been revised to clarify a PORC quorum.

The quorum statement has been revised to clarify that the quorum consists of the chairman (or his designated alternate) in addition to a majority of the required members. The reduction in the number of required PORC members has no effect on the number of members required to make up the quorum.

The Power Systems Engineering group and the System Operating group have been deleted from the list of corporate support staff (CSS) in TS 6.5.b.2 (formerly TS 6.5.2.2).

The Power Systems Engineering group has been removed from the list of CSS, as the group now reports directly to the Substation and Transmission group. The Substation and Transmission group is listed as part of the CSS.

The System Operating group has been removed due to a recommendation which resulted from a WPSC Quality Assurance audit. System Operating is responsible for the safe, reliable, and economic operation of the WPS bulk electric and gas systems. The Kewaunee plant supports System Operating by providing electrical generation for the system. System Operating personnel do not support safety-related activities, nor are they badged or trained to provide support in actual day-to-day operations of the plant, therefore this group is being removed from the list of CSS.

The Engineering Control group and the Emergency Preparedness group have been added to the list of CSS.

The Engineering Control group has been added to the list of CSS. Previously, this group was included in the Engineering Support group. Due to organizational changes, this group is now a separate group, responsible for records management, coordination of the development and implementation of the nuclear configuration management program, and KNPP and corporate document control.

The Emergency Preparedness group has been added to the list of CSS. Emergency preparedness activities have been transferred to the Governmental Affairs Group of the Public Affairs Department. The Emergency Preparedness Group's primary function will continue to be the maintenance of an effective emergency preparedness program for the Kewaunee Nuclear Power Plant. However, the group's experience in interfacing with state and local government officials and its emergency planning experience can now be effectively applied to other areas of the company. This organizational change will also unite the emergency public information aspects of emergency response and the plant emergency preparedness program within the same department.

Description of Proposed Change: TS 6.9

TS 6.9.a.3 (formerly TS 6.9.1.c) is being revised to correct the address for the submittal of the monthly operating report.

Description of Proposed Change: TS 6.14

"Administrative Control Directives" has been changed to "nuclear administrative directives" in TS 6.14.

WPSC is in the process of implementing a consolidation of plant Administrative Control Directives (ACD's) and corporate Engineering Control Directives (ECD's) into Nuclear Administrative Directives (NAD's) with appropriate

implementing procedures. Until this process is complete, all ECD's, ACD's, and NAD's referenced in TS's will be referred to as "nuclear administrative directives". The consolidation of ECD's and ACD's into NAD's is being made to eliminate duplicate directives and provide for more efficient control over directives. Approval of NAD's will be given to the appropriate responsible manager.

Safety Evaluation for Proposed Changes to TS Section 6 - Administrative and Formatting Changes

This proposed amendment contains administrative and formatting changes to convert TS Section 6.0 to the Word Perfect format and correct minor typographical errors and format inconsistencies. Among these changes are renumbering the existing specifications in a manner consistent with other TS Sections.

These administrative and formatting changes have been reviewed to ensure they do not alter the intent or interpretation of the specification; therefore, there is no impact on public health or safety.

Significant Hazards Determination for Proposed Changes to TS Section 6 - Administrative and Formatting Changes

This proposed amendment contains administrative and formatting changes to the KNPP Technical Specifications. These revisions do not change the intent of the Technical Specifications or decrease WPSC's management support or involvement in activities at the Kewaunee Plant.

Therefore, the proposed changes pose no significant hazards for the following reasons:

1. The proposed changes will not result in a significant increase in the probability of occurrence or consequences of an accident.
2. The proposed changes will not create the possibility of a new or different kind of accident from any previously analyzed.
3. The proposed changes will not involve a significant decrease in the margin of safety.

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The proposed changes are similar to example C.2.e.i in 51 FR 7751. Example C.2.e.i is given to describe purely administrative changes that are, therefore, not likely to involve a significant hazard.

III) High Radiation Area

Several changes are being proposed to TS 6.13 "High Radiation Area." These changes will result in TS 6.13 resembling NUREG-0452 "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." The changes are discussed below.

Description of Proposed Changes: TS 6.13

- The distance from the source of radioactivity at which the field is measured is being defined.
- The applicability of Radiation Work Permit (RWP) requirements are being specified.
- A change is being made to state that high radiation areas greater than 1000 mrem/hr shall be under the administrative control of health physics supervision in addition to the on-duty shift supervisor.
- A clarification is being made to state that all accessible areas with radiation levels greater than 1000 mrem/hr where no enclosure exists shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

Safety Evaluation for Proposed Changes to TS Section 6.13 - High Radiation Area

These proposed changes will not reduce the level of commitment to radiation protection practices or control over high radiation areas at Kewaunee. The changes are intended to clarify the specification and are equivalent to requirements in the Westinghouse STS 6.12, with the exception of defining the distance from the source of radioactivity at which the field is measured. The Westinghouse STS requires the field be measured at a distance of no more than 45 centimeters; the proposed specification requires 30 centimeters. The 30 centimeter distance is being proposed to be consistent with the definition of High Radiation Area in the revision to 10 CFR Part 20.

These changes are being proposed to clarify and enhance the existing specification. The proposed changes will not reduce the effectiveness of the radiation protection program at Kewaunee, therefore, there is no impact on public health and safety.

**Significant Hazards Determination for Proposed Changes
to TS 6.13 - High Radiation Area**

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 of occurrence or consequences of an accident previously evaluated,
- 2) create the possibility of a new or different kind of accident from any previously analyzed,
- 3) involve a significant decrease in the margin of safety.

The proposed changes will not reduce the level of commitment to the radiation protection practices, or control over high radiation areas at Kewaunee. The changes are intended to clarify the specification and are equivalent to the requirements of Westinghouse STS 6.12. Therefore, no significant hazards exist.

Environmental Considerations for Proposed Changes to TS Section 6

This proposed amendment involves changes to recordkeeping, reporting, or administrative procedures or requirements. 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 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this proposed amendment.