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SUBJECT: Application for amend to License DPR-43, consisting of proposed Amend 114 to relocate RETS from TS to ODCM & spec on solid radwaste to PCP, per GL 89-01.

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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

May 4, 1993

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

10 CFR 50.90

Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Proposed Amendment 114 to the Kewaunee  
Nuclear Power Plant Technical Specifications

References: 1) Generic Letter 89-01, Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or the Process Control Program, dated January 31, 1989

This proposed amendment (PA) is being submitted to remove the Radiological Effluent Technical Specifications (RETS) from the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS). This PA is in accordance with guidelines stated in Reference 1, which summarizes the results of the Nuclear Regulatory Commission's (NRC) study of RETS as it relates to the Commission's Interim Policy Statement on Technical Specification Improvements.

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The NRC study concluded that controls could be implemented in the Administrative Controls section of the Technical Specifications to satisfy existing regulatory requirements for RETS. With these controls in place, procedural details of the current technical specifications on radioactive effluents and radiological environmental monitoring could be relocated to the Offsite Dose Calculation Manual (ODCM). Similarly, procedural details of the current technical specification on solid radioactive wastes could be relocated to the Process Control Program (PCP). This simplification of the RETS is identified in Generic Letter 89-01 as a line-item improvement of the technical specifications consistent with the goals of the NRC Policy Statement on Technical Specification Improvements.

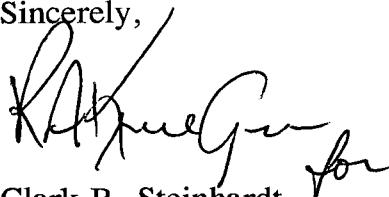
Attachment 1 to this letter contains a description, a safety evaluation, a significant hazards determination, and environmental considerations for the proposed changes. Attachment 2 contains the affected TS pages. Please note that TS Section 1 and TS Section 6.9 also affect PA 103.

Formatting changes and corrections of minor typographical errors are also being proposed as a part of converting the TS document over to the Word Perfect software now being used at Wisconsin Public Service Corporation (WPSC) for word processing.

WPSC's revised ODCM is included as Attachment 3 as was requested by Generic Letter 89-01. Attachment 4 contains the revised PCP.

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,

A handwritten signature in black ink, appearing to read "Clark R. Steinhardt", with a stylized flourish at the end.

Clark R. Steinhardt  
Senior Vice President - Nuclear Power

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May 4, 1993  
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Attach.

cc - US NRC - Region III  
US NRC Senior Resident Inspector  
Mr. R. S. Cullen, PSCW

Subscribed and Sworn to  
Before Me This 4<sup>th</sup> Day  
of May 1993

Jeanne M. Steur  
Notary Public, State of Wisconsin

My Commission Expires:

June 18, 1995

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ATTACHMENT 1

TO

Letter from C. R. Steinhardt (WPSC)

to

Document Control Desk (NRC)

Dated

May 4, 1993

PROPOSED TS AMENDMENT NO. 114

Description of Changes, Safety Evaluation,  
Significant Hazards Determination,  
and Environmental Considerations

### Description of Proposed Changes

This proposed amendment will: (1) incorporate programmatic controls in the Administrative Controls section of the TS that satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50; (2) relocate the existing procedural details in current specifications involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the TS to the ODCM; (3) relocate the definition of solidification and existing procedural details in the current specification on solid radioactive wastes to the PCP; (4) simplify the associated reporting requirements; (5) simplify the administrative controls for changes to the ODCM and PCP; (6) add record retention requirements for changes to the ODCM and PCP; and (7) update the definitions of the ODCM and PCP consistent with these changes.

Specifically, the proposed changes are as follows:

#### Description of Proposed Changes to Section 1

1. Definition 1.0.o.1, GASEOUS RADWASTE TREATMENT SYSTEM, is being relocated to the Offsite Dose Calculation Manual.
2. Definition 1.0.o.2, MEMBER(S) OF THE PUBLIC, is being renumbered 1.0.o.1.
3. Definition 1.0.o.3, OFF-SITE DOSE CALCULATION MANUAL (ODCM) is being renumbered 1.0.o.2.
4. Definition 1.0.o.4, PROCESS CONTROL PROGRAM (PCP), is being renumbered 1.0.o.3.
5. Definition 1.0.o.5, PURGE - PURGING, is being relocated to the ODCM.
6. Definition 1.0.o.6, SITE BOUNDARY, is being renumbered 1.0.o.4.
7. Definition 1.0.o.7, SOLIDIFICATION, is being relocated to the PCP.
8. Definition 1.0.o.8, UNRESTRICTED AREA, is being renumbered 1.0.o.5.
9. Definition 1.0.o.9, VENTILATION EXHAUST TREATMENT SYSTEM, is being relocated to the ODCM.
10. Definition 1.0.o.10, VENTING, is being relocated to the ODCM.

11. Definition 1.0.o.11, RADIOLOGICAL ENVIRONMENTAL MONITORING MANUAL (REMM), is being relocated to the ODCM.
12. Administrative changes are being made to convert TS Section 1.0 to the Word Perfect format and correct minor typographical and format inconsistencies. Among these changes are capitalizing all of the defined words. The practice of capitalizing defined terms will be incorporated throughout the TS as each section is revised and converted to the Word Perfect format.

Description of Proposed Changes to Section 6.0

1. TS 6.9.3.a, "Annual Radiological Environmental Monitoring Report" has been renumbered TS 6.9.b.1. Programmatic controls for the Annual Radiological Environmental Monitoring Report have been added and procedural controls have been relocated to the ODCM.
2. TS 6.9.3.b, "Semiannual Radioactive Effluent Release Report" has been renumbered TS 6.9.b.2. Programmatic controls for the Semiannual Radioactive Effluent Release Report have been added and procedural controls have been relocated to the ODCM. TS 6.9.3.b(1)(c), "Solid Waste Shipped," has been relocated to the PCP.
3. Record retention requirements for the ODCM and the PCP have been added to TS Section 6.10.
4. A new section is being added to TS 6.16. This section establishes requirements for the Radioactive Effluent Controls Program and the Radiological Environmental Monitoring Program.
5. Section 6.17 is being revised to incorporate requirements associated with initiating changes to the PCP.
6. Section 6.18 is being revised to incorporate requirements associated with initiating changes to the ODCM.

Description of Proposed Changes to Section 7/8

1. Section 7/8 has been relocated to either the ODCM and the PCP as appropriate.

### **Safety Evaluation for Proposed Changes**

This proposed amendment will implement the programmatic controls of the RETS in the Administrative Controls section of the TS and relocate the procedural details of the current TS on radioactive effluents and radiological environmental monitoring to the ODCM. In addition, the procedural details of the current TS on solid radioactive waste will be relocated to the PCP. These actions simplify the RETS, meet the regulatory requirements for radioactive effluents and radiological environment monitoring, and are provided as a line-item improvement of the TS, consistent with the goals of the Commission's Interim Policy Statement on Technical Specification improvements.

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

### **Significant Hazards Determination for Proposed Changes**

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

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated.
- 2) create the possibility of a new or different kind of accident from any accident previously evaluated.
- 3) involve a significant reduction in the margin of safety.

It is not the intent to reduce the level of radiological effluent control. Rather, this proposed amendment will provide programmatic controls for RETS consistent with regulatory requirements and allow relocation of the procedural details of current RETS to the ODCM or PCP. Therefore, future changes to these procedural details will be controlled by the Administrative Controls section of the TS regarding changes to the ODCM or PCP.

### **Environmental Considerations**

WPSC has determined that this 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.