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SUBJECT: Withdraws proposed Amend 105 to plant Tech Spec, requesting approval to use alternate repair criteria for SG tubes experiencing outside diameter stress corrosion cracking at support plate intersections.

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November 8, 1993

10 CFR 50.90

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

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Withdrawal of Proposed Amendment 105 On
Steam Generator Tube Support Plate Alternate Repair Criteria

- References:
- 1) Letter from C. R. Steinhardt (WPSC) to NRC Document Control Desk dated December 27, 1991
 - 2) Letter from C. R. Steinhardt (WPSC) to NRC Document Control Desk dated March 17, 1993

The purpose of this letter is to withdraw Proposed Amendment (PA) request number 105 to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS). This PA was submitted to the NRC staff on December 27, 1991, requesting approval to use an alternate repair criteria (APC) for the steam generator (SG) tubes experiencing outside diameter stress corrosion cracking at the support plate intersections.

Wisconsin Public Service Corporation (WPSC) understands that the NRC staff is evaluating APC on a generic basis as part of the larger SG Degradation Specific Management program effort. Our understanding is that the staff will be recommending rule making and Regulatory Guides as the method to implement the SG Degradation Specific Management program. Therefore, we feel that it is appropriate to withdraw this amendment request until further guidance is available.

Related to our request for the APC, WPSC had requested an interim repair criteria (IPC) in February of 1993 for application during the 1993 refueling outage. This request was subsequently withdrawn in March due to time constraints for review of the IPC request and its

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potential delay of plant startup. In our March 17, 1993, letter withdrawing that PA, we committed to re-apply for the APC in July following examination of the three SG tubes pulled during the 1993 refueling outage and to address all of the information in the NRC's request for additional information (RAI) received in response to the IPC application.

At the present time, we do not anticipate submitting any further PAs for APC or IPC until the NRC staff is further along in the rule making process and we have had an opportunity to review the NRC's guidance information, namely NUREG-1477, in its final form. Additionally, we will not be specifically responding to the RAI, but will be pursuing the generic method when it becomes available.

If our need for a voltage based repair criteria changes prior to completion of NUREG-1472, we will notify you as soon as possible. WPSC supports the NRC's approach of addressing SG maintenance generically through rule making and encourages the staff to maintain an aggressive schedule on resolving the issues.

If have any questions or need additional information, please contact me or a member of my staff.

Sincerely,

Charles A. Schrock

Charles A. Schrock
Manager - Nuclear Engineering

SLB/cjt

cc - US NRC, Region III
US NRC, Senior Resident Inspector

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