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SUBJECT: Forwards TS pages of proposed amend 101D to License DPR-43,  
 re GL 90-06, "Resolution of Generic Issue 70, 'PORV & Block  
 Valve Reliability' & Generic Issue 94, "Addl LTOP for LWRs'  
 Per 10CFR50.54(f)."

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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

March 4, 1994

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  
Proposed Amendment 101D to the Kewaunee Nuclear  
Power Plant Technical Specifications

- References:
- 1) Letter dated December 26, 1990 from C. R. Steinhardt (WPSC) to Document Control Desk (NRC).
  - 2) Letter dated May 9, 1991 from C. R. Steinhardt (WPSC) to Document Control Desk (NRC).
  - 3) Letter dated June 25, 1991 from C. R. Steinhardt (WPSC) to Document Control Desk (NRC).
  - 4) Letter dated July 24, 1992 from C. R. Steinhardt (WPSC) to Document Control Desk (NRC).
  - 08-141 5) Letter dated January 21, 1993 from A. G. Hansen (NRC) to C. A. Schrock (WPSC).
  - 6) Letter dated May 5, 1993 from C. R. Steinhardt (WPSC) to Document Control Desk (NRC).

Generic Letter 90-06 (GL 90-06) "Resolution of Generic Issue 70, "Power-Operated Relief Valve and Block Valve Reliability," and Generic Issue 94 "Additional Low Temperature Overpressure Protection for Light-Water Reactors," Pursuant to 10 CFR 50.54(f)" proposed

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several actions to be taken by licensees. These actions represented new staff positions and were processed as a backfit in accordance with NRC procedures. In accordance with 10 CFR 50.54 (f), licensees were required to advise the NRC staff of their intent to either follow the revised staff positions or to propose alternative measures.

In References 1 through 4, Wisconsin Public Service Corporation (WPSC) submitted responses and proposed Technical Specifications to address the technical issues of GL 90-06. In Reference 5, NRC staff notified WPSC that the previous submittals did not adequately respond to three specific areas identified in GL 90-06, and requested an additional response be provided within 60 days. Reference 6 responded to this request and included Proposed Amendment (PA) 101C to the Kewaunee Technical Specifications (TS). Further review of PA 101C and conversations with Mr. R. Laufer, NRR, Acting Project Manager for Kewaunee, indicate that modifications to PA 101C are necessary. Specifically, the proposed allowed outage time for one inoperable flow path to the overpressure relief valve (RHR 33-1) is being shortened from 7 days to 5 days in TS 3.1.b.4.A.1 and the associated basis. The technical justification in the safety evaluation and significant hazards determination submitted with PA 101C are more compatible with a 5-day allowed outage time.

Additionally, we are proposing to revise the Low Temperature Overpressure (LTOP) enabling temperature to be based on Reactor Coolant System (RCS) cold leg temperature vice RCS average temperature in TS 3.1.b.1.C, TS 3.1.b.4 and the associated bases. This change brings consistency with TS 3.1.a.1.C, is conservative because it requires LTOP protection to be enabled over a larger temperature range, and is consistent with Westinghouse Standard Technical Specifications, NUREG-1431, Rev. 0. Further editorial changes are made to correct "Low Temperature Overpressurization Protection" to "Low Temperature Overpressure Protection" on pages TS vi, TS B3.1-7 and Figure TS 3.1-4 and to correct "pressurization heaters" to "pressurizer heaters" in TS 3.1.b.1.B. No other changes to the PA 101C submittal are being proposed.

We have reviewed the safety evaluation, significant hazards determination and environmental considerations submitted with PA 101C and have determined that they are applicable to PA 101D. Therefore a new safety evaluation, significant hazards determination or environmental considerations are not submitted. Attachment 1 to this letter contains the affected proposed TS pages. These pages supersede the TS pages submitted with PA 101C. TS Section 3.1 is submitted in its entirety to reflect the changes made by the approval of Amendment 100. All proposed changes associated with PA 101D are shaded.

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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March 4, 1994  
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Sincerely,

*C. R. Steinhardt*

C. R. Steinhardt  
Senior Vice President-Nuclear Power

DJK/cjt

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 March 1994

*Jeanne M. Ferris*  
Notary Public, State of Wisconsin

My Commission Expires:

June 18, 1995

LIC\NRC\PA10ID.WP