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SUBJECT: Discusses addl commitment required for expedited approval of Proposed Amend 126, revising TS 3.1.f, "Min Conditions for Criticality" to specify that MTC shall be no greater than 5.0 pcm/F at or below 60% rated thermal power.

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November 30, 1994

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  
Additional Commitment Required for Expedited Approval of Proposed Amendment 126 to Kewaunee's Technical Specifications.

- Reference
- 1) Proposed Amendment 126 to the Kewaunee Nuclear Power Plant Technical Specifications, from C. R. Steinhardt (WPSC) to Document Control Desk (NRC), dated April 11, 1994.
  - 2) NRC Safety Evaluation Report for Qualification of Reactor Physics Methods for Application to Kewaunee, from A. Schwencer to E. R. Mathews, dated October 22, 1979.
  - 3) NRC Safety Evaluation Report for the Reload Safety Evaluation Methods For Application to Kewaunee, from J. G. Giitter (NRC) to D. C. Hintz (WPSC), dated April 11, 1988

On April 11, 1994, Wisconsin Public Service Corporation (WPSC) submitted proposed amendment (PA) 126 to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TSs)(reference 1). This PA was submitted to revise TS 3.1.f, "Minimum Conditions for Criticality", to specify that the moderator temperature coefficient (MTC) shall be no greater than 5.0 pcm/°F at or below 60% rated thermal power. This PA also incorporated required actions to be implemented if the MTC specification is not met.

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November 30, 1994  
Page 2

WPSC became aware of potential questions the Nuclear Regulatory Commission (NRC) may have regarding Anticipated Transient Without Scram (ATWS) issues associated with proposed technical specification amendments involving positive MTCs. Therefore, on October 24, 1994, WPSC initiated a telephone conversation with NRC staff to resolve potential concerns associated with approving PA 126. It was determined that one acceptable approach is for the KNPP's core designers to design the core each cycle to have a MTC no less negative than  $-8.0 \text{ pcm}/^{\circ}\text{F}$  for 95% of the cycle.

On November 8, 1994, WPSC initiated another telephone conversation to the NRC to clarify the conclusions drawn from the October 24, 1994 telephone conversation. Specifically, the point of clarification was to define exactly what time period is referenced in the statement "95% of the cycle." It was agreed by both the NRC and WPSC that KNPP core designers will design each cycle's core to have a MTC no less negative than  $-8.0 \text{ pcm}/^{\circ}\text{F}$  for 95% of the scheduled time at full power.

For each of Kewaunee's cycles, KNPP's core will continue to be designed to have a MTC no less negative than  $-8.0 \text{ pcm}/^{\circ}\text{F}$  for 95% of the scheduled time at full power. This design will be accomplished with the NRC approved reload safety evaluation methodology (references 2 & 3). In addition, each cycle's core design will be reported in the Reload Safety Evaluation Report for that cycle.

WPSC will notify the NRC of any changes to the above commitment.

Sincerely,



C.A. Schrock  
Manager - Nuclear Engineering

RTS/san

cc - US NRC Region III  
US NRC Senior Resident Inspector

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