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SUBJECT: Provides info re efforts re verification of Kewaunee USAR & other design & licensing basis info.

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NRC-96-137

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December 30, 1996

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
Voluntary USAR Initiative

- References:
- 1) Federal Register Vol. 61, No. 203, pages 54461 - 54466, dated October 18, 1996, "Policy and Procedure for Enforcement Actions; Departures From FSAR"
 - 2) Letter from J. M. Taylor (NRC) to D. A. Bollom (WPSC), dated October 09, 1996, "Request for Information Pursuant to 10 CFR 50.54(f) Regarding Adequacy and Availability of Design Bases Information"

This letter provides information regarding our efforts relative to verification of the Kewaunee Updated Safety Analysis Report (USAR) and other design and licensing basis information. The following paragraphs briefly describe these efforts, including scope and schedule.

We are currently performing reviews of our design and licensing basis in order to provide the necessary information for responding to the 10 CFR 50.54(f) NRC request regarding adequacy and availability of design bases information, as well as for responding to the NEI Initiative (NEI 96-05) for assessing licensing basis information. In addition, we are in the final planning stages for an assessment of our USAR to be performed in 1997.

In response to the NEI Initiative, our operations and technical staffs are performing a review of USAR information related to four plant systems: Condensate, Component Cooling Water, Chemical and Volume Control, and Safety Injection. This review will verify that the USAR information is correct and accurately reflects operational practices and procedures. In addition to the USAR review, we are also reviewing a sample of various plant and program changes (e.g.,

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December 30, 1996

Page 2

design changes, operator workarounds, procedure changes) to verify that 10 CFR 50.59 was correctly applied and that our licensing basis accurately reflects the changes. Discrepancies identified in the reviews will be documented and dispositioned using the Kewaunee Assessment Process (KAP). We plan to complete the review, evaluation, and reporting necessary to respond to the NEI Initiative by April 15, 1997. The results from this assessment will be evaluated to determine if further review beyond that detailed below is necessary.

In addition to the NEI Initiative, we are planning to perform a comprehensive assessment of our USAR in 1997. Results from the NEI Initiative will be used in determining the final scope of this assessment. In general, our operations and technical staffs will verify that the information presented in our USAR is accurate and complete. This assessment will provide reasonable assurance that our USAR is consistent with our current licensing basis, contains correct design descriptions and analysis, and accurately reflects our current operating practices and procedures. We expect that the USAR review and the evaluation of results will be completed by December 31, 1997; any necessary corrective actions should be completed by the end of 1997 or a schedule for completion documented.

Besides the formal efforts described above, the Kewaunee staff continues to identify USAR issues and concerns through informal reviews and USAR reviews performed in conjunction with other programs (e.g., design changes). An increased sensitivity to design issues, a greater understanding of the importance of maintaining the USAR, and a questioning attitude have contributed to issues being identified and resolved.

The USAR will be updated and submitted to the NRC in 1997 in accordance with 10 CFR 50.71. The update will reflect all changes in effect up to six months prior to the submittal, including those changes necessitated by the reviews described above.

Sincerely,



M. L. Marchi

Manager - Nuclear Business Group

PRR/dlf

cc - US NRC Region III
US NRC Senior Resident Inspector