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USAR, deleting redundant info, incorporating new refs &  
deleting incorrect refs, correcting errors & augmenting  
existing requirements.

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October 13, 1997

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 149 to the Kewaunee  
Nuclear Power Plant Technical Specifications

This proposed amendment (PA) is being submitted to make numerous miscellaneous changes to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS). Changes in this PA include relocating information to the USAR, deleting redundant information, incorporating new references and deleting incorrect references, correcting errors, and augmenting existing requirements.

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.

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,

*Clark R. Steinhardt*

Clark R. Steinhardt  
Senior Vice President - Nuclear Power

BJD

Attach.

cc - US NRC, Region III  
US NRC Senior Resident Inspector  
Electric Division, PSCW

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Subscribed and Sworn to  
Before Me This 13<sup>th</sup> Day  
of October 1997

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

My Commission Expires:  
June 13, 1999

**ATTACHMENT 1**

**Letter from C. R. Steinhardt (WPSC)**

**To**

**Document Control Desk (NRC)**

**Dated**

**October 13, 1997**

**PROPOSED TS AMENDMENT NO. 149**

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

### **Description of Proposed Changes**

**TS B3.8-1** - The amount of time for the reactor to go critical, as discussed in the basis for TS 3.8, Refueling Operations, has been changed from 'approximately 61 minutes' to 'longer than 30 minutes'. This change is a result of using more conservative inputs in the analysis of the Chemical and Volume Control System malfunction events, and is being made to maintain consistency with the USAR. Although this change reduces the explicit time of 61 minutes identified in the basis, the analysis continues to provide safety margin with conservative assumptions and results that satisfy the acceptance criteria of the NRC Standard Review Plan (SRP) 15.4.6, "Chemical and Volume Control System Malfunction that Results in a Decrease in Boron Concentration in the Reactor Coolant (PWR)". This change continues to provide sufficient time for the operator to take action to prevent criticality.

**Table TS 3.1-1** - Table 3.1-1, Reactor Vessel Toughness Data, has been removed from the technical specifications. No references to this table currently exist, or appear to have ever existed, in the technical specifications. This table provides reactor vessel fabrication information. This information does not satisfy commission criteria (10 CFR 50.36(c)(2)(ii)) for inclusion in the technical specifications. This table will be relocated to the USAR.

**Table TS 3.5-2** - Note 2 has been deleted from Table TS 3.5-2, Items 2, 5, 6, and 7. This note is redundant to TS 3.5.d which allows bypassing an instrument channel for up to 4 hours to permit testing of the operable channel.

**TS 4.2 and Basis** - The Nuclear Regulatory Commission, through Federal Register Vol. 61, No. 154, amended its regulations to incorporate by reference the 1992 edition with the 1992 addenda of Subsection IWE, "Requirements for Class MC and Metallic Liners of Class CC Components of Light Water Cooled Power Plants," of Section XI, Division I of the ASME Boiler and Pressure Vessel Code. This change incorporates the new references into TS 4.2 and the associated basis.

**TS 4.5.a.1.A** - The statement that the safety injection and residual heat removal pumps need not be operated for the Safety Injection system test has been deleted. This statement is in conflict with the USAR, Section 6.2, which states the safety injection pumps operate during SI system testing. Current practice at KNPP is to operate the pumps during testing.

**TS 4.5.b.2.A** - The requirement to test the Refueling Water Storage Tank (RWST) outlet valves (i.e., SI-4A and SI-4B) during the test of the Safety Injection (SI) pumps has been removed from this technical specification. These valves allow suction to be taken from the RWST to the SI pumps. Not testing these valves is acceptable because at least one of the valves is de-energized in its safety position whenever the SI system is required to be operable. A safety evaluation was performed for this change under a design change which removed the boric acid tank from the

accident mitigation sequence. As a result of this design change, the pumps' suction transfer from the boric acid tank to the RWST is no longer performed. The RWST outlet valves are no longer required to change position and therefore should not be required to be tested. Testing of passive valves is not required by the KNPP IST Program or the ASME code.

**TS 4.13** - This change is being made to revise incorrect references in TS 4.13.c and TS 4.13.e. The revision to these references was overlooked in a previous technical specification amendment.

**TS 4.17 and TS 3.12 Basis** - This revision deletes the reference to the location of the control room ventilation (R-23) monitor. This change will resolve a discrepancy between the USAR and the TS and also will resolve concerns expressed by the NRC during Inspection 50-305/97005. The specific location of the radiation monitor is a design detail described in the USAR. This information does not satisfy commission criteria (10 CFR 50.36(c)(2)(ii)) for inclusion in the technical specifications. This change is administrative in nature as the intent of the technical specification, i.e., automatic initiation of the control room postaccident recirculation system on a high radiation signal, has not changed.

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

Changes in this PA include relocating information to the USAR, deleting redundant information, incorporating new references and deleting incorrect references, correcting errors, and augmenting existing requirements. The intent or interpretation of these specifications is not changed; therefore, the changes have no safety significance.

### **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.

The likelihood that an accident will occur is neither increased nor decreased by these TS changes. The TS changes will not impact the function or method of operation of plant equipment. Thus, there is not a significant increase in the probability of a previously analyzed accident due to the changes. Since no plant practices have changed and no physical changes are being made, no systems, equipment, or components are affected by

the proposed changes. Thus, the consequences of the malfunction of equipment important to safety previously evaluated in the Updated Safety Analysis Report (USAR) are not increased by the changes.

The proposed changes are administrative in nature and, therefore, have no impact on accident initiators or plant equipment, and thus, do not affect the probabilities or consequences of an accident.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

Operation of the facility in accordance with the proposed TS changes would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not involve changes to the physical plant or operations. Since these administrative changes do not contribute to accident initiation, they do not produce a new accident scenario or produce a new type of equipment malfunction. Also, these changes do not alter any existing accident scenarios; they do not affect equipment or its operation, and thus, do not create the possibility of a new or different kind of accident.

- 3) Involve a significant reduction in the margin of safety.

Changes in this PA include relocating information to the USAR, deleting redundant information, incorporating new references, deleting incorrect references, correcting errors, and augmenting existing requirements. Operation of the facility in accordance with the proposed TS would not involve a significant reduction in a margin of safety. The proposed changes do not affect plant equipment or operation. Safety limits and limiting safety system settings are not affected by these proposed changes.

### **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)(11). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this proposed amendment.