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SUBJECT: Proposed Amend 151 to license DPR-43,revising surveillance requirements of primary containment sys to be in accordance w/10CFR50 App J,Option B.

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Wisconsin Public Service Corporation
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February 25, 1998

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

10 CFR 50.90

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 151 to the Kewaunee Nuclear Power Plant Technical Specifications

This proposed amendment (PA) to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS) is being submitted to revise the surveillance requirements of the primary containment system to be in accordance with 10 CFR 50 Appendix J, Option B.

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 following affected TS pages: TS 4.4-1 through TS 4.4-3, Basis TS B4.4-1 through TS B4.4-3, and TS 6.20-1.

WPSC plans to implement Option B and its extended test interval provisions during the next refueling outage, scheduled to start October 16, 1998. We are currently developing a Containment Leakage Rate Testing Program to specify the details for Type A, B, and C testing and visual examinations. The program will be developed in accordance with the guidance in Regulatory Guide 1.163, NEI 94-01, and ANSI/ANS-56.8-1994 and will be available on-site for NRC inspection.

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,

Mark L. Marchi for
Clark R. Steinhardt
Senior Vice President - Nuclear Power

Subscribed and Sworn to
Before Me This 25th Day
of February 1998

Jeanne M. Ferris
Notary Public, State of Wisconsin

My Commission Expires:
June 13, 1999

A017

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

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ATTACHMENT 1

Letter from C.R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Dated

February 25, 1998

Proposed Amendment 151

Description of Proposed Changes

Safety Evaluation

Significant Hazards Determination

Environmental Considerations

Introduction

Containment leakage rate testing is currently performed in accordance with 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors." The NRC amended its regulations (60FR49495) in September, 1995, to provide an alternative method (Option B, "Performance-Based Requirements") for containment leakage rate testing. Kewaunee Nuclear Power Plant (KNPP) has chosen to adopt Option B of 10 CFR 50, Appendix J. The proposed revision will modify Technical Specification (TS) Section 4.4, "Containment Tests," and its basis. A new section, TS 6.20, will be added to support the changes to Section 4.4.

Description of Proposed Changes to Technical Specification

1. Technical Specification (TS) 4.4, "Containment Tests"

   The surveillance requirements of TS 4.4.a, "Integrated Leak Rate Tests (Type A)," and TS 4.4.b, "Local Leak Rate Tests (Type B and C)," are being replaced in their entirety, with reference to the "Containment Leakage Rate Testing Program."

   The pertinent information that was omitted in the still applicable sections, including the hydrostatic visual leakage tests, will be included in the Containment Leakage Rate Testing Program. In addition, leakage outside containment will continue to be monitored for these systems in accordance with our System Integrity program, TS 6.12.

2. Technical Specification TS 6.20, "Containment Leakage Rate Testing Program"

   New TS 6.20, "Containment Leakage Rate Testing Program," will be added to describe the test program, its acceptance criteria, and its adherence to the requirements of Regulatory Guide 1.163, dated September, 1995.

3. Technical Specification Basis for TS 4.4, "Containment Tests"

   The "Background" section will be replaced in its entirety to clarify the containment systems involved. Reference is also made to the "Containment Leakage Rate Testing Program." The basis sections for TS 4.4.a and TS 4.4.b will be deleted in their entirety. Basis information will be contained in the Containment Leakage Rate Testing Program. The remaining TS basis sections that were unaffected will be left intact.

The Table of Contents, pages TS ii and TS iv, have been revised due to page renumbering and the creation of section TS 6.20.

Safety Evaluation for Proposed Change to TS 4.4, "Containment Tests" and the Creation of TS 6.20, "Containment Leakage Rate Testing Program"

The Containment System is designed to provide protection for the public from the consequences of a steam line break or loss-of-coolant accident. Design limits for radiation doses resulting from accidental releases of radioactivity from a reactor plant are specified in 10 CFR 100. The off-site dose consequences for the loss-of-coolant accident (LOCA) are contained in the Updated Safety Analysis Report (USAR), Section 14.3.5. The containment vessel and its penetrations are designed to be essentially leak free and are demonstrated by tests to have a leakage rate not exceeding the allowable leakage rate (L_a) with margin.

The proposed TS change does not affect the containment vessel or its penetrations in any material way. All of the design and licensing inputs that have been reviewed and approved by the NRC in determining the effectiveness of the containment in limiting the release from a loss-of-coolant accident remain unchanged.

Under Option B, test intervals for Type A, Type B, and Type C testing may be determined by using a performance-based approach. Performance-based test intervals are based on consideration of operating history of the component and resulting risk from its failure. The performance-based approach to leakage rate testing discussed in NUREG-1493, "Performance-Based Containment Leak-Test Program," concludes that the impact on public health and safety due to extended test intervals is negligible. There is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed Technical Specification changes.

Significant Hazards Determination for Proposed Change to TS 4.4, "Containment Tests" and the Creation of TS 6.20, "Containment Leakage Rate Testing Program"

The proposed changes were reviewed in accordance with the provisions of 10 CFR 50.92 to determine that no significant hazards consideration (NSHC) exists. The proposed changes will not:

1. **Involve a significant increase in the probability or consequeuces of an accident previously evaluated.**

   The proposed TS changes do not involve any physical or operational changes to structures, systems or components. The current safety analysis and design basis for the accident mitigation functions of the containment, the airlocks, and the containment isolation valves are maintained. On-site and off-site dose consequences remain unaffected. Containment leakage rate testing is not an accident initiator.

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

The accidents considered are found in the Safety Analysis, Section 14 of the USAR. The proposed change does not involve a change to the plant design (structures, systems or components) or operation. No new failure mechanisms beyond those already considered in the current plant Safety Analysis are introduced. No new accident is introduced and no safety-related equipment or safety functions are altered. The proposed change does not affect any of the parameters or conditions that contribute to initiation of any accidents.

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

The implementation of Option B potentially affects the frequency of Type A, B, and C containment testing. Except for the determination of test frequency, the methods for performing the actual tests are not changed. NUREG-1493, "Performance-Based Containment Leak-Test Program", dated September, 1995, which forms the basis for the Appendix J revision, concludes that adoption of performance-based testing will not significantly reduce the margin of safety. Therefore, the proposed TS amendment will not involve a significant reduction in a margin of safety and will continue to support the design and licensing basis of ensuring an essentially leak-tight containment boundary.

Environmental Considerations

This proposed TS amendment involves a change with respect to a surveillance requirement. WPSC has determined that the proposed amendment, (I) involves no significant hazards consideration, (ii) no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and (iii) that there is no significant increase in the 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)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this proposed amendment.