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SUBJECT: Provides status of commitments made in 930303 & 26 ltrs re installation of AFW pump trip for loss of suction events.

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May 7, 1993

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Auxiliary Feedwater Pump Loss of Suction Pressure Trip

- References:
1. Letter from C.A. Schrock to NRC Document Control Desk dated February 2, 1993.
 2. Letter from C.A. Schrock to NRC Document Control Desk dated February 26, 1993.
 3. Letter from C.R. Steinhardt (WPS) to NRC Document Control Desk dated April 18, 1989.
 4. Letter from C.R. Steinhardt (WPS) to NRC Document Control Desk dated May 5, 1993.

In reference 1, Wisconsin Public Service Corporation (WPSC) made several commitments associated with the installation of an auxiliary feedwater (AFW) pump trip for loss of suction events. This submittal provides the status of each of these commitments along with those made by WPSC in reference 2.

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COMMITMENT #1 - IMPLEMENT ADMINISTRATIVE CONTROLS

As described in reference 1, WPSC performed an evaluation of the procedures available to the operations crew and determined that certain alarm response procedures needed enhancement. In the interim period while the procedure changes were being drafted and reviewed, WPSC committed to placing administrative controls in the control room. The administrative controls were placed in the control room on February 3, 1993, and remained there until the procedures were revised and approved.

COMMITMENT #2 - PRELIMINARY DESIGN DETAILS AND SCHEDULE FOR IMPLEMENTATION

WPSC committed to provide the NRC with preliminary design details and a schedule for implementation of the AFW loss of suction trip by February 26, 1993. This information was submitted to the NRC in reference 2. In reference 2, WPSC stated that the preliminary design called for one pressure switch to be installed on the separate suction piping to each of the three AFW pumps. We also stated that one of the inputs in determining the pressure setpoint would be a simultaneous three pump start test performed during the 1993 refueling outage. The three pump start test was performed along with single pump starts of each of the three pumps during the recently completed refueling outage. The test data indicated that the low suction pressure trip setpoint would need to be at a sub-atmospheric pressure. Because the purpose of the low suction pressure trip was to indicate a failure of the condensate storage tanks (CST) or the CST discharge piping as a result of an earthquake or tornado, a subatmospheric trip setpoint would not provide the protection needed as the suction pressure for these failures would be atmospheric pressure. Therefore, the project team responsible for the modification decided a low discharge pressure trip, rather than a low suction pressure trip, would best provide the desired NPSH protection. In addition, the project team has decided to install an override feature on the existing pump start/stop switches in the control room to enable the operations crew to override the trip signal if an instrument malfunction were to occur.

WPSC stated in reference 2 that the equipment installation would be completed by August 1, 1993, including installation of the low suction pressure alarm function in the control room. Alarms already exist for each AFW pump to indicate abnormal pump conditions. Included in this alarm is a low discharge pressure input. These are the same alarm windows that would have been used for the low suction pressure signals. Use of the existing low discharge pressure alarm input eliminates the installation of an additional alarm in the control room. The final low pressure trip setpoint may vary from the existing setpoint for the low discharge pressure alarm; therefore, the current alarm setpoint will be modified, if necessary, prior to August 1, 1993. The existing discharge pressure switch is non-safety related; it will be replaced with a safety-related switch as part of the final design installation.

As before, installation of the new equipment will be dependent on the receipt of all equipment necessary for the design. The pressure switches and time delay relays have the longest lead time and are currently expected to be delivered by August 1, 1993. For this reason the installation and final tie-ins are anticipated to occur during the first plant shutdown after August 1, 1993. The installation will be completed at the first shutdown condition, because installing the override feature will require wiring in a control room panel which contains the control switches for all three AFW pumps. WPSC does not consider it prudent to work in the confined space of a control room panel at power, and even more so in this case when redundant switches are in close proximity.

COMMITMENT #3 - PROCEDURE REVISIONS

WPSC committed to revising the alarm response procedures associated with abnormal AFW pump conditions and natural disasters prior to leaving cold shutdown conditions following the 1993 refueling outage. The abnormal procedure for the auxiliary feedwater system and the emergency procedure for natural disasters were revised along with the alarm response sheet for seismic events per the schedule committed to in reference 1.

COMMITMENT #4 - REVIEW OF OPEN NRC COMMITMENTS

The final commitment made by WPSC was to review all open NRC commitments to ensure that all action items are receiving the appropriate priority and resources. Our schedule called for this to be complete on or before May 1, 1993. In addition, this review would include information provided in reference 3. The review of all open NRC commitments has been completed with a priority ranking assigned to each commitment. This review did not identify any open commitments that required immediate attention. The review of the docketed correspondence to support the information provided in reference 3 is approximately half completed; the full review will be completed by the end of May. This review has been delayed because resources were redirected to address KNPP outage issues (Reference 4).

COMMITMENT #5 - TECHNICAL SPECIFICATIONS

The Technical Specifications (TS) associated the AFW pump low discharge pressure trip will be as described in reference 2. Following completion of the modification, WPSC will impose administrative controls consistent with the proposed specifications, until the TS are approved.

Document Control Desk
May 7, 1993
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If there are any questions regarding the actions or schedule described in this letter, please contact a member of my staff.

Sincerely,

C.A. Schrock

C. A. Schrock
Manager-Nuclear Engineering

PMF/cjt

cc - US NRC - Region III
NRC Senior Resident

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