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SUBJECT: Provides 60 day response which advises of intentions & general approaches in meeting schedule & recommendations of GL 95-07.

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TITLE: Generic Ltr 95-07 - Pressure Locking & Thermal Binding of Safety Rel

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October 16, 1995

10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission
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Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Response to Generic Letter 95-07

Reference: 1) NRC Generic Letter 95-07: Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves, dated August 17, 1995

In accordance with the reporting requirements of Reference 1, this letter is Wisconsin Public Service Corporation's 60 day response advising you of our intentions and general approach in meeting the schedule and recommendations of Generic Letter 95-07.

Generic Letter 95-07 was issued to request that addressees perform the following actions. First, within 90 days, identify the valves which are potentially susceptible to pressure locking and thermal binding and provide a basis for their operability. Second, within 180 days, conduct an evaluation of susceptible valves and perform further analysis and corrective actions with justification for longer implementation schedules as needed.

The responses required by the generic letter are: 1) a 60-day response describing the extent of intended implementation of the requested actions and associated schedule, or an alternate course of action as appropriate, and 2) a 180-day response documenting the second requested action by providing the following requested information:

1. Description of susceptibility evaluations, additional analysis, and the susceptibility criteria used.
2. Evaluation results, including a list of susceptible valves.
3. Corrective actions identified, schedules, and justifications of operability as appropriate.

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The Westinghouse Owners Group (WOG) has developed a program to assist utilities in addressing the requirements of Generic Letter 95-07. In part, the program will establish a common set of criteria which can be applied in the screening and evaluation of the pressure locking and thermal binding phenomena. Most of the NSSS systems, as well as many of the valves in those systems, are common among the various Westinghouse plants. Thus, it is beneficial and cost effective, to both WOG members and the NRC, to utilize the expertise of the member utilities and Westinghouse to develop a consistent, effective, and comprehensive set of screening and evaluation criteria that can be used by all WOG plants. To this end, a task team of WOG members has been formed as a part of this program and is in the process of developing the criteria.

A set of screening criteria will be defined to identify valves potentially susceptible to pressure locking and thermal binding, taking into account both component and systems considerations. Criteria and methodology are also being developed to assist in determining the impact on safety function capability for each valve determined to be potentially susceptible to pressure locking and thermal binding. Once the criteria have been established, each utility can apply the criteria to its own population of safety-related, power-operated gate valves. As potentially susceptible valves are identified, the evaluation criteria and methodology will be used to determine the impact on valve safety function capability.

Because of the importance in completing further evaluations to determine what effect pressure locking and thermal binding may have on valve operability, it is felt that resources can be more appropriately and productively focused on meeting the 180-day actions, and it is requested that the 90-day action be waived. The WOG Task Team has established an aggressive schedule for the criteria development for valves potentially susceptible to pressure locking and thermal binding. Even with this aggressive schedule, operability assessment efforts will be most effective if they are concentrated on only those valves for which long term safety function capability is not demonstrated. If at any time during the evaluation process, a valve is determined to be incapable of performing its safety function, an operability assessment will be made and a justification of continued operability developed. If operability cannot be demonstrated, the applicable technical specification actions will be followed.

The Kewaunee Nuclear Power Plant will comply with all actions and responses specified in the 180-day response. These include completion and documentation of the following:

1. Screening criteria
2. List of susceptible valves
3. Description of evaluations
4. Susceptibility evaluation results
5. Corrective actions taken or scheduled
6. Justifications for continued operability, as needed.

Document Control Desk
October 16, 1995
Page 3

These actions will be completed and the responses provided to the NRC within 180 days of the date of Generic Letter 95-07.

If you have questions or need additional information, please contact a member of my staff.

Sincerely,

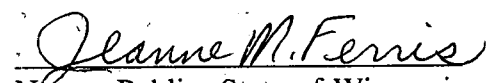


Clark R. Steinhardt
Senior Vice President - Nuclear Power

BJD

cc - US NRC, Region III
US NRC Senior Resident Inspector
Mr. Lanny Smith, PSCW

Subscribed and Sworn to
Before Me This 16th Day
of October 1995


Notary Public, State of Wisconsin

My Commission Expires:

June 13, 1999