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FACIL:50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Servic 05000305
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SUBJECT: Forwards "USI A-46 Seismic Evaluation Rept," in response to GL 87-02.

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November 10, 1995

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
Generic Letter 87-02, Summary Report for Resolution of USI A-46

- References: 1) Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46," dated February 19, 1987, U.S. Nuclear Regulatory Commission.
  - "Supplement No. 1 to Generic Letter (GL) 87-02 that Transmits Supplemental Safety Evaluation Report No. 2 (SSER No. 2) on SQUG Generic Implementation Procedure, Revision 2, As Corrected on February 14, 1992, (GIP-2)," dated May 22, 1992, U.S. Nuclear Regulatory Commission.
  - "Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment," Revision 2, Corrected 2/14/92, Seismic Qualification Utility Group (SQUG).
  - 4) Letter from C.R. Steinhardt (WPSC) to the NRC Document Control Desk, "Response to Supplement 1 of Generic Letter 87-02 on SQUG Resolution of USI A-46," dated September 17, 1992.
  - 5) Letter from C.R. Steinhardt (WPSC) to the NRC Document Control Desk, "Generic Letter 87-02, SQUG Resolution of USI A-46," dated February 18, 1993.

Document Control Desk November 10, 1995 Page 2

- 6) Letter from A.G. Hansen (NRC) to C.A. Schrock (WPSC), "Evaluation of Kewaunee Nuclear Power Plant 120-Day Response to Supplement No. 1 to Generic Letter 87-02 (TAC M69455)," dated December 22, 1992.
- 7) Letter from A.G. Hansen (NRC) to C.A. Schrock (WPSC), "Evaluation of Kewaunee Nuclear Power Plant Updated Response to Supplement No. 1 to Generic Letter 87-02 (TAC M69455)," dated June 8, 1993.

In Generic Letter (GL) 87-02 (reference 1), the NRC Staff set forth the process for resolution of USI A-46, and encouraged the affected nuclear power plant licensces to participate in a generic program to resolve the seismic verification issues associated with USI A-46. In Supplement 1 to GL 87-02 (reference 2), the Staff required a response to include a commitment to the Generic Implementation Procedure (GIP) (reference 3) prepared by the Seismic Qualification Utility Group (SQUG), a schedule for the implementation of the GIP, and submission of a report summarizing the results of the USI A-46 program. By letters to the NRC Staff dated September 17, 1992 (reference 4), and February 18, 1993 (reference 5), Wisconsin Public Service Corporation (WPSC) committed to implement the GIP, including the clarifications, interpretations, and exceptions in SSER-2 (reference 2), and to communicate to the NRC Staff any significant or programmatic deviations from GIP guidance. The NRC Staff provided their evaluation and acceptance of WPSC's responses by letters dated December 22, 1992 (reference 6) and June 8, 1993 (reference 7). WPSC agreed to submit the results of the USI A-46 evaluation by November 10, 1995.

This letter forwards the results of the USI A-46 evaluation for the Kewaunee Nuclear Power Plant. This letter also confirms that no significant or programmatic deviations from the GIP guidance were made during the USI A-46 resolution process.

#### USI A-46 REPORTS

The GIP requires that a plant-specific Summary Report be submitted to the NRC Staff, including a proposed schedule for future modifications and replacements of those outliers which are yet to be resolved. The GIP also requires the development of Safe Shutdown Equipment List (SSEL), Seismic Evaluation, Relay Evaluation, and Completion Reports. This letter, with its attachments, constitutes the Summary Report. Attachment 1 is the Seismic Evaluation Report and Attachment 2 is the Relay Evaluation Report. As permitted by the GIP, the pertinent results from the SSEL Report are included in the attached Seismic Evaluation and the Relay Evaluation Reports. The Completion Report will be submitted when all the planned actions for resolution of USI A-46 have been completed.

Document Control Desk November 10, 1995 Page 3

## **OUTLIERS**

Equipment and relay outliers were identified during the seismic and relay reviews. Outliers are items of equipment which do not comply with all of the screening guidelines provided in the GIP. These outliers are described in detail in the attached reports.

As described in Attachments 1 and 2, the majority of the outliers identified at Kewaunee have been resolved. The schedule for resolution, future modifications, and replacements of the remaining unresolved outliers is provided in the attached reports. WPSC currently plans to have the remainder of the outliers resolved prior to December 31, 1996.

If there are any questions regarding the Summary Report, please contact a member of my staff.

Sincerely,

C. R. Steinhardt

Senior Vice President - Nuclear Power

your Stummed

GCR/jmf

Attach.

cc - US NRC Region III

US NRC Senior Resident Inspector

Subscribed and Sworn to

Before Me This 10+1 Day

of November 1995

Notary Public, State of Wisconsin

My Commission Expires: