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SUBJECT: Provides written confirmation that fulfilled commitment to modify whip restraint gaps during 1992 outage re NRC Bulletin 88-11, "Pressurizer Surge Line Thermal Stratification."

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June 8, 1992

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

Gentlemen:

Docket 50-305 Operating License DPR-43 Kewaunee Nuclear Power Plant Completion of NRC Bulletin 88-11

Reference: 1) US NRC Bulletin 88-11, "Pressurizer Surge Line Stratification," dated December 20, 1988 (Received January 3, 1989).

- 2) Letter from C.R. Steinhardt (WPSC) to US NRC Document Control Desk dated February 6, 1991.
- 3) Letter from A.G. Hansen (US NRC) to C.A. Schrock (WPSC) dated January 3, 1992.
- 4) Letter from C.R. Steinhardt (WPSC) to US NRC Document Control Desk dated August 2, 1991.
- 5) Letter from C.R. Steinhardt (WPSC) to US NRC Document Control Desk dated November 14, 1991.

On December 20, 1988, the Nuclear Regulatory Commission (NRC) issued Bulletin 88-11 titled, "Pressurizer Surge Line Thermal Stratification" (reference 1). The bulletin requested all licensees to establish and implement a program to confirm pressurizer surge line integrity. Reference 3 requested Wisconsin Public Service Corporation (WPSC) to provide written

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confirmation within 60 days of implementation of the modifications to the pressurizer surge line described in reference 2. The purpose of this letter is to notify the NRC that the modifications described in reference 2, and all of the Actions Requested in Bulletin 88-11 pertinent to the Kewaunee Nuclear Power Plant (KNPP), have been completed.

In accordance with Bulletin item 1.b of the Actions Requested, WPSC completed stress and fatigue evaluations of the KNPP pressurizer surge line (reference 2). The analysis, which was based on the modified whip restraint configuration, demonstrated compliance with the stress and fatigue requirements delineated in Section III of the ASME Boiler and Pressure Vessel Code for the current licensed life of the KNPP. By letter dated August 2, 1991 (reference 4), and supplemented by letter dated November 14, 1991 (reference 5), WPSC requested permission from the NRC to modify the whip restraint gaps during the 1992 refueling outage. To demonstrate acceptability of the new whip restraint configuration and ensure compliance with General Design Criteria 4 (Appendix A to 10 CFR 50), WPSC proposed to apply leak-before-break (LBB) analysis before subsequent restart of KNPP.

In reference 3, the NRC concluded that WPSC's approach to satisfy Bulletin 88-11 and application of LBB analysis were acceptable.

Modification of the pipe whip restraint configuration was completed April 11, 1992 during the refueling outage. Completion of this modification closed out Bulletin 88-11. Application of LBB analysis of the surge line with the modified whip restraint configuration, which was approved January 3, 1992 by the NRC staff (reference 3), assures surge line integrity for the duration of the operating license.

In closing, this letter provides written confirmation that WPSC has fulfilled the commitment to modify the whip restraint gaps during the 1992 outage and that the applicable bulletin requirements have been completed. Please feel free to contact a member of my staff if you have any questions regarding this submittal.

Sincerely,

Weller Steinhardo

C. R. Steinhardt Senior Vice President - Nuclear Power

RLF/jac

cc - US NRC - Region III Mr. Patrick Castleman, US NRC Subscribed and Sworn to Before the This 8+4 Day

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Notary Public, State of Wisconsin

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