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SUBJECT: Responds to NRC concerns re acceptability of PWR LOCA-ECCS models used by Siemens Power Corp. W contracted to complete new large break LOCA analysis incorporating upper plenum injection features of Kewaunee Plant.

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October 25, 1996

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
Large Break Loss-of Coolant Accident Evaluation Model for the Kewaunee Nuclear Power Plant

- References:
- 1) Letter from B.W. Sheron (NRC) to M.L. Marchi (WPSC) dated October 11, 1996.
 - 2) Letter from M.L. Marchi to Document Control Desk dated August 23, 1996.
 - 3) Letter from M.L. Marchi to Document Control Desk dated July 23, 1996.

On October 10, 1996 the NRC notified WPSC of their conclusions regarding the acceptability of the PWR LOCA-ECCS models used by Siemens Power Corporation (SPC). The NRC staff concluded that the 1991 model was unacceptable for use and that the 1986 model had an unacceptable error. This information is detailed in Reference 1. The current analysis of record for the Kewaunee Plant relies on the 1991 model; however, as reported in Reference 2, a contingency analysis was performed using the 1986 model with acceptable results. WPSC has had ongoing discussions with SPC concerning the NRC staff concerns with use of the 1986 model. Also as reported in Reference 3, WPSC has contracted the Westinghouse Electric Corporation to complete a new large break LOCA analysis incorporating the upper plenum injection features of the Kewaunee Plant. WPSC anticipates near term completion of this effort.

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Currently the Kewaunee Plant is in an extended shutdown. Prior to the reactor plant being made critical following this outage,

- 1) Actions to resolve the unacceptable error in the 1986 SPC model (e.g., an interim model adjustment to address the non-physical behavior of the reflood heat transfer correlation, restrictions on fuel peaking factors, restrictions on power level, etc.) will be taken, or
- 2) Analysis using an alternate NRC approved model will be completed (most likely as outlined in Reference 3).

Sincerely,



M. L. Marchi *ML*
Manager - Nuclear Business Group

RPP

cc - US NRC, Region III
US NRC Senior Resident Inspector