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 MARCHI, M.L. Wisconsin Public Service Corp. *See Report*
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SUBJECT: Forwards Rev M to "Pumps & Valves IST Plan." Summary of changes, also encl.

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August 28, 1997

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

10 CFR 50.55a

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Inservice Testing Plan, Revision M

- References: 1) Letter from Gail H. Marcus (NRC) to M.L. Marchi (WPSC) dated July 15, 1994
- 2) Letter from Gail H. Marcus (NRC) to M.L. Marchi (WPSC) dated June 30, 1997

Wisconsin Public Service Corporation (WPSC) has revised its Inservice Testing (IST) Plan for the Kewaunee Nuclear Power Plant (KNPP). The significant changes included in this revision are summarized in Attachment 1. Several other minor administrative changes are also included in this revision. Attachment 2 contains Revision M of the IST Plan.

Also included with this submittal is a new Relief Request, IST-RR-29, which deals with remote position indication verification (Attachment 3). WPSC requests that the NRC review the attached Relief Request in accordance with 10 CFR 50.55a(f)(6)(i). Subsequent to NRC review and approval, WPSC will include Relief Request IST-RR-29 in the next revision to the IST Plan.

If you have any questions or would like additional information, please contact me or Kevin Hujet of my staff.

Sincerely,

for M. L. Marchi
Manager - Nuclear Business Group

KPH
Attach. 040033
cc - US NRC Region III
US NRC Senior Resident Inspector

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ATTACHMENT 1

Letter from M. L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

August 28, 1997

Summary of IST Plan Changes

- Change #1 The Residual Heat Removal (RHR) pumps were removed from Relief Request IST-RR-5 and also reference to Note 29 WPS removed for the RHR pumps. The RHR pumps are now tested quarterly under full flow conditions. Therefore, IST-RR-5 and Note 29 no longer apply. Table 1 of the IST Plan has been updated for the RHR pumps to reflect these changes.
- Change #2 Relief Request IST-RR-27 WPS added to the IST Plan following NRC review and approval (Reference 1). Reference to this Relief Request has been added to Table 1 for the Service Water pumps.
- Change #3 Four valves were removed from the IST Plan. SI-2A(B) and SI-4A(B) have been removed from the plan due to a recent design change. The design change changed the initial suction source for the SI pumps from the concentrated boric acid tanks to the Refueling Water Storage Tank. Therefore, these valves are no longer required to operate to supply a suction path to the SI pumps during a Safety Injection actuation.
- Change #4 Relief Request IST-RR-8A WPS deleted from the IST Plan. RHR-401A(B) are now full flow tested on a quarterly basis. Therefore, IST-RR-8A is no longer required. Table 2 of the IST Plan has been updated for RHR-401A(B) to reflect this change.
- Change #5 NG-107-1 WPS added to Relief Request IST-RR-6. This valve is similar in nature to the other valves included in IST-RR-6. This valve is not within the scope of the IST Plan, therefore prior NRC review and approval is not required. Table 2 of the IST Plan has been updated to reflect this change.
- Change #6 Relief Request IST-RR-10A WPS modified to require disassembly/inspection of each valve, SI-21A(B) and SI-22A(B), at least once during the 120-month interval. This change WPS previously approved by the NRC (Reference 1).
- Change #7 Relief Request IST-RR-11 WPS modified to include additional information on testing the Component Cooling pumps using curves. This change WPS previously approved by the NRC (Reference 1).
- Change #8 Four valves were added to the IST Plan. FW-7A(B) and FW-10A(B) were added based on the safety significance of the valves. These valves are not within the scope of the IST Plan. However, they have been added to the plan to heighten the awareness of plant personnel to the importance of these valves and to provide guidance for retest requirements. Note 42 WPS added to the plan to clarify retest requirements.

Change #9 Relief Request IST-RR-28 WPS added to the IST Plan. This Relief Request deals with the use of currently installed suction pressure gauges, which do not meet the range requirement of OM-6, for the RHR and Auxiliary Feedwater (AFW) pumps. This change WPS previously approved by the NRC (Reference 2). Table 1 of the IST Plan has been updated for the RHR and AFW pumps to reflect this change.

Change #10 Thirty-four safety/relief valves were added to the IST Plan in response to Notice of Violation 96-010-002. The valves added are:

| | | | | |
|---------------|----------------|------------|------------|------------|
| CC-1003A(B) | CC-201 | CC-301 | CC-652 | CC-803 |
| CC-501 | CC-611A(B) | CC-630A(B) | CVC-40 | CVC-261 |
| CC-907 | CVC-101A(B)(C) | LD-5 | LD-13 | SI-106A(B) |
| FPC-70 | ICS-20A(B) | SW-1610 | SW-913AB-2 | SW-913CD-2 |
| MU-320A(B)(C) | SI-312 | CC-312 | CC-401A(B) | |

WPSC has determined that these valves fall within the scope of OM-10 and will therefore be tested in accordance with OM-1. The Surveillance Procedures for these valves are being developed. For this reason, the "Test Procedure" listed in the IST Plan is denoted as "To be determined." Following development of the required procedures, the IST Plan will be updated to reflect this information.

ATTACHMENT 2

Letter from M. L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

August 28, 1997

Inservice Testing Plan, Revision M