



Wisconsin Public Service Corporation
 (a subsidiary of WPS Resources Corporation)
 600 North Adams Street
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 Green Bay, WI 54307-9002
 1-920-433-5544 fax

November 24, 1998

10 CFR 50.90

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

Ladies/Gentlemen:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
Proposed Amendment 152a to the Kewaunee Nuclear Power Plant Technical Specifications

- References:
- 1) Letter from C. R. Steinhardt to Document Control Desk dated April 15, 1998; "Proposed Amendment 152 to the Kewaunee Nuclear Power Plant Technical Specifications."
 - 2) Letter from M. L. Marchi to Document Control Desk dated September 5, 1997; "KEW-19 Fuel and Cycle 23 Reload Design Changes."
 - 3) Letter from M. L. Marchi to Document Control Desk dated September 28, 1998; "Proposed Amendment 152a to the Kewaunee Nuclear Power Plant Technical Specifications."
 - 4) Letter from M. L. Marchi to Document Control Desk dated August 13, 1998; "Response to Request for Additional Information - Proposed Amendment 152."

On April 15, 1998 Wisconsin Public Service Corporation (WPSC) requested an amendment to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (Reference 1) to implement improvements realized by the new fuel design (Reference 2). The proposed amendment also reflected operation with a fuel rod average burnup to 62 Gwd/MtU. In response to NRC concerns with some of the administrative changes and to expedite the amendment, WPSC submitted a revision to proposed amendment on September 28, 1998 (Reference 3). Recent discussions with the NRC Project Manager indicate a need to address the environmental considerations of operation at the extended fuel burnup level.

To continue processing of the proposed amendment and support unrestricted power operation, WPSC agrees to restrict the maximum fuel rod average burnup to 60 Gwd/MtU. This will place Kewaunee operation within the scope of the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for extended burnup fuels published in the Federal Register on February 29, 1988.

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WPSC agrees to the proposed amendment being modified to include a specific license condition identifying this burnup limit. The proposed limit would read as follows:

(5) Fuel Burnup

The maximum rod average burnup for any rod shall be limited to 60 Gwd/MtU until completion of an NRC environmental assessment supporting an increased limit.

To ensure optimum power level operation is not delayed, Wisconsin Public Service Corporation (WPSC) respectfully requests that this amendment be approved before December 4, 1998.

In accordance with the requirements of 10 CFR 50.30(b), this submittal has been signed and notarized. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

Sincerely,

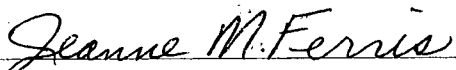


Mark L. Marchi
Site Vice President-Kewaunee Plant

RPP/jmf

cc - US NRC - Region III
US NRC Senior Resident Inspector
Electric Division, PSCW

Subscribed and Sworn to
Before Me This 24th Day
of November 1998


Notary Public, State of Wisconsin

My Commission Expires:
June 13, 1999