Central file

WISCONSIN PUBLIC SERVICE CORPORATION

P.O. Box 1200, Green Bay, Wisconsin 54305

September 17, 1979

Mr. J. G. Keppler, Regional Director
Office of Inspection & Enforcement
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

Docket 50-305
Operating License DPR-43
IE Bulletin 79-14
Seismic Analysis for As-Built Safety-Related Piping Systems

As a follow-up to our letter of August 9, 1979, this letter is intended to respond to items 2, 3 and 4 of the referenced bulletin. In accordance with bulletin 79-14, the July 20, 1979 revision, and the August 15, 1979 supplement, an inspection of the safety related piping systems for conformance to seismic analyses for the Kewaunee Plant has been completed.

As discrepancies were found between the existing piping layout/structure as compared to the piping layout/structure documents used in the original seismic analyses, they were evaluated by both Fluor Power Services (FPS), our architect engineers, and our engineering staff. It should be stressed that these discrepancies have not been identified as non-conformances. Most of the differences between the as found and as analyzed piping layout/structures are due to engineering design changes that have analyzed the impact of the change on the seismic analysis. The original design documents would not have been updated to reflect as built conditions unless a complete reanalysis of that piping section was performed. The attached list identifies those discrepancies which have not yet been resolved. It appears that for these discrepancies it will be easier and most cost effective to reanalyze these pipe sections than to search for documentation which verifies that the existing analysis is adequate for the as found condition. We are proceeding in this manner and expect to have these analyses complete by October 10.

An engineering review of these discrepancies by our AE indicates that there are no substantial problems, but a reanalysis will be performed to justify this position. Until the reanalysis is complete, continued operation is justified because in no case is redundant ECCS systems as required by Technical Specifications affected.

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During the last few months, a number of detailed inspections and examinations have been requested or directed by Bulletins issued by your office in regards to piping supports and seismic analysis. We have proceeded with dispatch in regards to each of these issues to assure that the Kewaunee Plant is safely designed, constructed, and maintained. The subsequent revisions to the bulletins which provide additional clarification of the wishes of the NRC staff prompt concern that the bulletins were hastily conceived and not well developed prior to their issuance. Our major concern, however, is in regards to the validity of the issue and the need for comprehensive investigations such as have been demanded by these Bulletins. To date, in regards to Bulletins 79-02 and 79-14, we have encountered expenses of numbers of hundreds of thousands of dollars and personnel exposure of in excess of 18 Man Rem or one third of the total man rem exposure encountered during the refueling from all sources, while not encountering any safety significant deficiencies or problems.

The direction employed to resolve each of these Bulletins in regards to the Kewaunee Plant has been to assure safety by a comprehensive investigation while attempting to maintain a reasonable control of both in personnel exposure and financial expenses. The bulletins provide direction to review all safety components with little apparent concern for cost effectiveness. A graduated approach to review systems such as employed in Section 11 of the ASME Boiler & Pressure Vessel Code or in Tech Specs in regards to Steam Generator Tube Inspection should be prescribed for Bulletins. When a response to one Bulletin results in an increase of total plant accumulated personnel exposure of more than 10% of the yearly average over the last four years and expenses in excess of a quarter of a million dollars without discovery of significant difficiencies, a more reasonable approach of selective inspections should be considered.

Very truly yours,

E R Mathews

E. R. Mathews
Vice President
Power Supply & Engineering

ERM:ljh

Attachment 1

1.0 Auxiliary Coolant

1.1 Rigid hanger installed in place of a spring hanger

1.2 A pipe stand uses schedual 80 pipe in place of schedual 160 pipe

2.0 Containment Spray

2.1 Horizontal restraint omitted

2.2 Hanger location change

3.0 Residual Heat Removal System

3.1 Hanger added

3.2 Axial restraint not installed

4.0 Service Water System

4.1 Hanger location change

4.2 Anchor added

4.3 Horizontal restraint added

4.4 Pipe routing change