

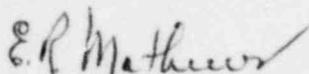
design at the Kewaunee Plant requires that the SFP system be continuously run. Even though the charcoal filter units are normally bypassed, conservative interpretation of the existing wording in Tech Specs requires both above described tests to be performed after 720 hours of system operation. Revised wording identical to the above accepted wording is being submitted in order to eliminate these highly expensive, unnecessary tests.

Revised wording is being submitted to remove the monthly testing requirement of a full load rejection test of the diesel generators and establish a test frequency of once per 18 months. This frequency is in accordance with accepted practice at recently licensed plants. Reduced load rejection frequency has also been recommended by the diesel generator manufacturer. We therefore request immediate review and relief from this requirement in light of the NRC Staff's concern for placing unnecessary challenges upon safeguard equipment, without justifiable cause.

Amendment No. 29 to the Kewaunee Technical Specifications changed the previous pressurizer pressure coincident with level safety injection signal to a pressure only signal. The bases of Section 3.5 was overlooked in requesting the change. Revised wording is being submitted to make the bases consistent with the previous change.

Enclosed is a check in the amount of \$1200.00 in order to cover the fee associated with processing this amendment. We have determined this amendment to be a Class II amendment in accordance with 10 CFR 170.22.

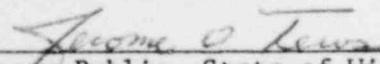
Very truly yours,



E. R. Mathews, Vice President
Power Supply & Engineering

snf

Subscribed and Sworn to
Before Me This 16th Day
of November 1979



Notary Public, State of Wisconsin

My Commission Expires

2-6-83

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Basis

Instrumentation has been provided to sense accident conditions and to initiate operation of the engineered safety features. (1) Section 2.3 of these specifications describes the limiting safety system settings for the protective instrumentation.

Safety Injection

The Safety Injection System is actuated automatically to provide emergency cooling and reduction of reactivity in the event of a loss-of-coolant accident or a steam line break accident.

Safety injection is initiated upon occurrence of low pressure in the pressurizer, which would occur following depressurization and coolant loss in a loss-of-coolant accident, and directly by a high containment pressure signal.

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Safety injection in response to a steam line break is provided directly by a low steam line pressure signal, backed up by the coincidence signal from the pressurizer and, in the case of a break within the containment, by the high containment pressure signal.

The Safety injection of highly borated water will offset the temperature-induced reactivity addition that could otherwise result from cooldown following a steam line break.

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to this value.

c. Residual Heat Removal System

1. Those portions of the Residual Heat Removal System external to the isolation valves at the containment shall be hydrostatically tested at 350 psig at each major refueling outage, or they shall be tested during their use in normal operation at least once between successive major refueling outages.
2. The total leakage from either train shall not exceed two gallons per hour. Visible leakage that cannot be stopped at test conditions shall be suitably measured to demonstrate compliance with this Specification.
3. Any repairs necessary to meet the specified leak rate shall be accomplished within seven days of resumption of power operation.

d. Shield Building Ventilation System

1. At least once per operating cycle or once every 18 months whichever occurs first, the following conditions shall be demonstrated:
 - A. Pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 10 inches of water and the pressure drop across any HEPA filter bank is less than 4 inches of water at the system design flow rate (+10%)
 - B. Automatic initiation of each train of the system.
 - C. Operability of heaters at rating and the absence of defects by visual inspection
2. A. The in-place DOP test for HEPA filters shall be performed (1) at least once per 18 months and (2) following painting, fire, or chemical release in any ventilation zone communicating with the system.
B. The laboratory tests for activated carbon in the charcoal filters shall be performed (1) at least once per 18 months for filters in a standby status or after 720 hours of filter operation, and

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- following painting, fire or chemical release in any ventilation zone communicating with the system. 41
- C. Cold DOP testing shall be performed after each complete or partial replacement of a HEPA filter bank or after any maintenance on the system that could affect the HEPA bank bypass leakage. 41
- D. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of a charcoal adsorber bank or after any maintenance on the system that could affect the charcoal adsorber bank bypass leakage. 41
- E. Each train shall be operated with the heaters on at least 10 hours every month. 41
3. Perform an air distribution test on the HEPA filter bank after any maintenance or testing that could affect the air distribution within the systems. The test shall be performed at designflow rate (+10%). The results of the test shall show the air distribution is uniform within +20%. 12
4. Each train shall be determined to be operable at the time of its periodic test if it produces measurable indicated vacuum in the annulus within two minutes after initiation of a simulated safety injection signal and obtains equilibrium discharge conditions that demonstrate the Shield Building leakage is within acceptable limits. 41
- e. Auxiliary Building Special Ventilation System
1. Periodic tests of the Auxiliary Building Special Ventilation System, including the door interlocks, shall be performed in accordance with Specifications 4.4.d.1 through 4.4.d.3 except for Specification 4.4.d.2.E. 41
2. Each train of Auxiliary Building Special Ventilation System shall be operated with the heaters on at least 15 minutes every month.

Applicability

Applies to periodic testing and surveillance requirements of the emergency power system.

Objective

To verify that the emergency power sources and equipment are operable.

Specification

The following tests and surveillance shall be performed:

a. Diesel Generators

1. Manually-initiated start of each diesel generator, and assumption of load by the diesel generator. This test shall be conducted monthly in accordance with the intent of Paragraph 6.4.1 and 6.4.3 of IEEE 387-1977. | 41
2. Automatic start of each diesel generator, load shedding, and restoration to operation of particular vital equipment, all initiated by a simulated loss of all normal a-c station service power supplies together with a simulated safety injection signal. This test will be conducted at each refueling interval to assure that each diesel generator will start and assume required loads to the extent possible within one minute. During this test a checkout of emergency lighting will be performed.
3. Each diesel generator shall be inspected at each major refueling outage.
4. Diesel generator load rejection test in accordance with IEEE 387-1977, section 6.4.5 shall be performed at least once per 18 months. | 41

b. Station Batteries

1. The voltage of each cell shall be measured to the nearest hundredth volt each month. An equalizing charge shall be applied if the lowest cell in the battery falls below 2.13 volts. The temperature and specific gravity of a pilot cell in each battery shall be measured.

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4.12 SPENT FUEL POOL SWEEP SYSTEM

Applicability

Applies to testing and surveillance requirements for the spent fuel pool sweep system in Specifications 3.8.a.9.

Objective

To verify the performance capability of the spent fuel pool sweep system.

Specification

- a. At least once per operating cycle or once every 18 months, whichever occurs first, the following conditions shall be demonstrated:
 1. Pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 10 inches of water and the pressure drop across any HEPA bank is less than 4 inches of water at the system design flow rate (+10%).
 2. Automatic initiation of each train.
- b.
 1. The in-place DOP test for HEPA filters shall be performed (1) at least once per 18 months and (2) following painting, fire, or chemical release in any ventilation zone communicating with the system.
 2. The laboratory tests for Activated Carbon in the charcoal filters shall be performed (1) at least once per 18 months for filters in a standby status or after 720 hours of filter operation, and (2) following painting, fire, or chemical release in any ventilation zone communicating with the system.
 3. Cold DOP testing shall be performed after each complete or partial replacement of a HEPA filter bank or after any maintenance on the system that could affect the HEPA bank bypass leakage.

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4. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of a charcoal adsorber bank or after any maintenance on the system that could affect the charcoal adsorber bank bypass leakage. 41
- c. Perform an air distribution test on the HEPA filter bank after any maintenance or testing that could affect the air distribution within the system. The test shall be performed at designflow rate (+10%). 12
The results of the test shall show the air distribution is uniform within +20%. 41
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steady state conditions greater than or equal to one percent; a calculated reactivity balance indicating a shutdown margin less conservative than specified in the technical specifications; short-term reactivity increases that correspond to a reactor period of less than 5 seconds or, if subcritical, an unplanned reactivity insertion of more than 50¢; or occurrence of any unplanned criticality. | 41

- (5) Failure or malfunction of one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of system(s) used to cope with accidents analyzed in the SAR.
- (6) Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.

Note: For items 6.9.2.a(5) and 6.9.2.a(6) reduced redundancy that does not result in a loss of system function need not be reported under this section but may be reportable under items 6.9.2.b(2) and 6.9.2.b(3) below.

- (7) Conditions arising from natural or man-made events that, as a direct result of the event require plant shutdown, operation of safety systems, or other protective measures required by technical specifications.
- (8) Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the safety analysis report or in the bases for the technical specifications