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TELECOPIER (414) 433-5544



PROPOSED RULE NUMBER PR 2, 50 & 54
(55 FR 29043)

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WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 18002 • Green Bay, WI 54307-8002

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OFFICE OF SECRETARY
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October 15, 1990

Secretary of the Commission
Attention Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Comments on Proposed Rule 10 CFR Part 54,
Nuclear Power Plant License Renewal

- References:
- 1) 55 FR 29043, Nuclear Power Plant License Renewal
 - 2) NUREG-1362, "Regulatory Analysis for Proposed Rule in Nuclear Power Plant License Renewal"
 - 3) NUREG-1398, "Environmental Assessment for Proposed Rule on Nuclear Power Plant License Renewal"
 - 4) NUREG-1412, "Foundation for the Adequacy of the Licensing Basis"
 - 5) Letter from Joe F. Colvin (NUMARC) to Samuel J. Chilk (NRC), dated October 15, 1990.

Wisconsin Public Service Corporation (WPSC) has reviewed the above referenced Federal Register Notice, principal supporting documents and the comments submitted by the Nuclear Management and Resource Council (NUMARC). WPSC is in support of NUMARC's comments and requests that you consider them carefully when formulating the final rule.

Two areas that we would like to stress are NUMARC's discussion on the extent and depth of the integrated plant assessment and the requirement to compile the plant's current licensing basis (CLB). We add our concern to NUMARC's that the integrated plant assessment requirement as presently stated in Section 54.21(a) of the proposed rule is too broad in scope. The existing wording will require evaluations more extensive than necessary to support the conclusion that aging is being managed during the renewal term.

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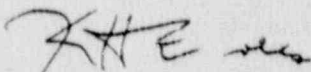
The criteria for screening systems, structures and components (SSCs) to be evaluated is vague and could be interpreted to include secondary systems which while capable of accident mitigation, are not required to perform a safety function to maintain the plant within the envelope of analyzed conditions. The criteria for determining which SSCs are to be evaluated should be set at a level to ensure that those systems whose primary purpose is to perform a safety function are considered. Additionally, the rule should recognize that the same level of extensive evaluation is not required to be performed on every component. The focus of the evaluation should be to verify the ability of a component to perform its safety function. Varying levels of evaluation and documentation should be required based on the complexity of the component and the degradation mechanisms.

The second area about which we are concerned is the requirement to compile the plant's CLB. The license renewal process, as we understand it, is limited in scope to age-related degradation issues. Requesting a compiled CLB may lead to the introduction of other issues beyond the scope of license renewal. Since the Commission has determined that a finding of compliance with the plant to its CLB is not required for issuance of a renewed license, there is no basis for compiling and providing this information. Moreover, the documents which are a part of the formal NRC docket are readily available and have provided a sufficient licensing basis to safely operate the plant over the original licensing term, therefore, a compilation of the plant's CLB is unnecessary.

In summary, we believe that the NRC and utilities must work towards a practical method of license renewal which will ensure continued safe operation of the plants, and will be economically feasible for the utilities. An overly burdensome rule or too many uncertainties in the renewal process will not accomplish this goal. These same factors could result in utility management not electing the license renewal option.

We appreciate the opportunity to comment on this very important proposed rule and supporting documents.

Sincerely,



K. H. Evers
Manager - Nuclear Power

SLB/cjt

cc - Mr. Patrick Castleman, US NRC
US NRC, Region III
US NRC, Document Control Desk