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**WISCONSIN PUBLIC SERVICE CORPORATION**

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

September 19, 1995

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

10 CFR 50.90

Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Proposed Amendment 130 to the Kewaunee  
Nuclear Power Plant Technical Specifications

This proposed amendment (PA) is being submitted to make numerous miscellaneous changes to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS). These revisions are being made for clarification purposes or to maintain the accuracy of the TS. Among the revisions include changes to reflect revisions to 10 CFR Part 20, "Standards for Protection Against Radiation."

Administrative changes are also being made to convert numerous sections to the Word Perfect format and correct minor typographical and format inconsistencies. Among these changes are renumbering the basis section pages and capitalizing the defined words similar to Westinghouse STS. This is part of an ongoing effort to revise each section of the KNPP TS to achieve a consistent format.

Please note PA 135 also affects this proposed amendment. The changes included with PA 135 are not included with this submittal.

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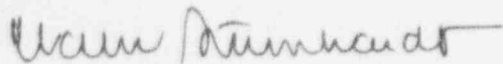
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Page 2

Attachment 1 to this letter contains a description, a safety evaluation, a significant hazards determination, and environmental considerations for the proposed changes. Attachment 2 contains the affected TS pages.

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,



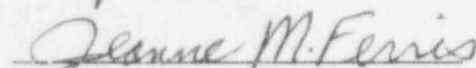
Clark R. Steinhardt  
Senior Vice President - Nuclear Power

BJD

Attach.

cc - US NRC, Region III  
US NRC Senior Resident Inspector  
Mr. Lanny Smith, PSCW

Subscribed and Sworn to  
Before Me This 19<sup>th</sup> Day  
of September 1995



Jeanne M. Ferris  
Notary Public, State of Wisconsin

My Commission Expires:  
June 13, 1999

ATTACHMENT 1

TO

Letter from C. R. Steinhardt (WPSC)

to

Document Control Desk (NRC)

Dated

September 19, 1995

PROPOSED TS AMENDMENT NO. 130

Description of Changes, Safety Evaluation,  
Significant Hazards Determination,  
and Environmental Considerations

### Description of Proposed Changes

Sections TS 2.1 and 2.2 - The revisions to this section are being made to convert the section to the Word Perfect format and/or to correct minor typographical and format inconsistencies. Among these changes are renumbering the basis section pages and capitalizing the defined words similar to Westinghouse STS. This is part of an ongoing effort to revise each section of the KNPP TS to achieve a consistent format.

Page TS B3.1-10 - The 10 CFR Part 20 limit for yearly whole body dose is being changed from 0.5 rem/yr to 0.1 rem/yr. 0.1 rem/yr is the new 10 CFR Part 20 dose limit to a member of the public.

TS 3.7.a.5 - The phrase "and their MCC's" has been removed. This change is administrative in nature and is being made for accuracy purposes. There are no, nor have ever been any, motor control centers fed from bus 1-51 or bus 1-61.

Page TS 3.10-9 and Sections TS 3.12 and 3.14 - See Description of Changes for Sections TS 2.1 and 2.2 above.

Table TS 3.1-2 - The name of the third column heading was revised to clarify that the maximum allowable leakage is based on normal operating pressure. This change is being made for clarification purposes only.

Page TS B4.8-1, and Sections TS 4.9, 4.12, 4.13, and 4.17 - See Description of Changes for Sections TS 2.1 and 2.2 above.

Table TS 4.1-3, Page 1 of 1 - A change has been made to Footnote (5) revising the word "integrity" to "inventory." This change corrects a typographical error which occurred with the previous revisions to this table. A footnote has also been added to the frequency of the RCS Leak Detection test to clarify that this test is only conducted when the reactor is at power or in the hot shutdown condition.

Page TS 6.9-2 - A change is being made to Footnote 1 to reflect a revision to 10 CFR Part 20. The reference to Section 20.407 is being changed to Section 20.2206(b). Also, the statement that dose assignments may be based on film badge measurements has been deleted. KNPP does not use film badges to estimate exposures.

TS 6.13.a - A change is being made to reflect a revision to 10 CFR Part 20. The reference to Paragraph 20.203(c)(2) is being changed to Paragraph 20.1601(a).

Page TS 6.19-1 - The word "annual" is being removed from footnote 1. This footnote specifies that licensees may choose to submit major changes to radioactive liquid, gaseous and solid waste treatment system in their USAR update. Kewaunee's USAR is no longer submitted on an annual basis; it is submitted 6 months after each refueling outage, in accordance with the relaxed requirements of 10 CFR 50.71(e)(4).

### **Safety Evaluation for Proposed Changes**

The changes included in this PA are strictly for clarification or accuracy purposes. The intent or interpretation of these specifications is not changed; therefore, the changes have no safety significance.

This PA also converts numerous TS sections to the Word Perfect format now being used at WPSC and corrects minor typographical errors and format inconsistencies. Among these changes are capitalizing the terms defined in Section TS 1.0 and renumbering the basis pages consistent with the Westinghouse Standard Technical Specifications practice. The changes have been reviewed to ensure that the intent or interpretation of the TS is not altered. These proposed amendment changes do not represent a decrease in the engineering, technical, or management support for the Kewaunee Plant. These changes are administrative in nature; therefore, there is no effect on public health and safety.

### **Significant Hazards Determination for Proposed Changes**

The proposed changes were revised in accordance with the provision of 10 CFR 50.92 to show no significant hazards exist. The proposed changes will not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated.

The likelihood that an accident will occur is neither increased or decreased by these TS changes. These TS changes will not impact the function or method of operation of plant equipment. Thus, there is not a significant increase in the probability of a previously analyzed accident due to these changes. No systems, equipment, or components are affected by the proposed changes. Thus, the consequences of the malfunction of equipment important to safety previously evaluated in the Updated Safety Analysis Report (USAR) are not increased by these changes.

The proposed changes are administrative in nature and, therefore, have no impact on accident initiators or plant equipment, and thus, do not affect the probabilities or consequences of an accident.

- 2) create the possibility of a new or different kind of accident from any accident previously evaluated.

Operation of the facility in accordance with the proposed TS changes would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not involve changes to the physical plant or operations. Since these administrative changes do not contribute to accident initiation, they do not produce a new accident scenario or produce a new type of equipment malfunction. Also, these changes do not alter any existing accident scenarios; they do not affect equipment or its operation, and thus, do not create the possibility of a new or different kind of accident.

- 3) involve a significant reduction in the margin of safety.

Operation of the facility in accordance with the proposed TS would not involve a significant reduction in a margin of safety. The proposed changes do not affect plant equipment or operation. Safety limits and limiting safety system settings are not affected by these proposed changes.

### **Environmental Considerations**

WPSC has determined that this proposed amendment involves no significant hazards considerations and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, this proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(11). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this proposed amendment.

ATTACHMENT 2

to

Letter from C. R. Steinhardt (WPSC)

to

Document Control Desk (NRC)

dated

September 19, 1995

PROPOSED TS AMENDMENT NO. 130

Affected TS Pages

Section TS 2.1 and Basis

Section TS 2.2 and Basis

TS B3.1-10

Section TS 3.7 and Basis

TS 3.10-9

Section TS 3.12 and Basis

Section TS 3.14 and Basis

Table TS 3.1-2, Page 1 of 1

TS B4.8-1

Section TS 4.9 and Basis

Section TS 4.12 and Basis

Section TS 4.13 and Basis

Section TS 4.17 and Basis

Table TS 4.1-3, Page 1 of 1

TS 6.9-2

TS 6.13-1

TS 6.19-1