

DMB

NRC-85-17

WISCONSIN PUBLIC SERVICE CORPORATION
P.O. Box 1200, Green Bay, WI 54305



February 1, 1985

Mr. C. J. Paperiello, Chief
Emergency Preparedness and Radiological Safety Branch
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Paperiello:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Inspection Report 84-14

Reference: Letter from C. J. Paperiello (US NRC) to C. W. Giesler (WPSC)
dated December 19, 1984, transmitting Inspection Report 50-305/84-14

The attachment to this letter details our response to the weaknesses identified
as a result of the Emergency Response Facility audit conducted by your staff.
The weaknesses were identified in Inspection Report 84-14 (DRSS).

Very truly yours,

Charles A. Schrock for
D. C. Hintz
Manager - Nuclear Power

DSN/js

Attach.

cc - Mr. S. A. Varga, US NRC
Mr. Robert Nelson, US NRC

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Attachment
Response to Weaknesses
Inspection Report 84-14

ERF Weakness 1

A routine testing program should be established for the TSC/RAF atmospheric cleanup systems to verify the assumed removal efficiency.

Response:

Procedures TSP 67-1, TSC Ventilation HEPA Filter DOP Test, and TSP 67-2, TSC Ventilation Charcoal Filter Freon Test, were written to address this weakness. The procedures were issued on September 27, 1984 and testing was performed on October 2 and 3, 1984. We expect to perform filter testing of the TSC/RAF atmospheric cleanup system on a biennial (every two years) basis.

ERF Weaknesses 2 & 3

Quantitative Auxiliary Building vent stack flow rate information should be made available for dose assessment calculations by either installing a vent stack flow measuring device or developing a matrix showing various fan combinations.

Quantitative Reactor Building vent flow rate information should be made available for dose assessment calculations. In addition, the dose assessment model should be revised to include this as a potential release pathway.

Response:

We are currently evaluating the development of a flow matrix based on the various possible fan combinations so that plant personnel can better understand and more accurately estimate vent flow rates based on fan status.

The evaluation will include a review of the Auxiliary Building Ventilation System and the Reactor Building Ventilation System. We also will explore the methods for determining a "chimney effect" flow in the event that no fans are running.

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The evaluation and investigation should be completed by August 1, 1985 at which time we will inform you of our recommended corrective actions.

ERF Weakness 4

An additional release pathway should be added to the dose assessment model that could represent any pathway not already addressed, whether it was from a stack, driven by a fan, monitored, etc.

Response:

We will modify the dose projection program such that a flow rate can be manually entered. This would allow coverage for any of a number of unexpected release paths and flows that might follow an accident. This could represent any other release pathway, whether or not it was from a stack, driven by a fan or calculated by engineering analysis. We expect this capability to be available by May 1, 1985.

ERF Weakness 5

EP-TSC-6 incorrectly estimates cladding oxidation from hydrogen production and must be corrected. The licensee committed to correct this by January 1, 1985.

Response:

Procedure EP-TSC-6, Assessment of Reactor Core Damage, was revised to correct the discrepancy in estimating cladding oxidation based on hydrogen production. The revised procedure was issued on December 28, 1984.