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NRC-92-100

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WISCONSIN PUBLIC SERVICE CORPORATION

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July 30, 1992

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Surge Line Flooding

References: 1) Letter from C.A. Schrock (WPSC) to NRC Document Control Desk dated May 11, 1992.

2) NRC Generic Letter 88-17, "Loss of Decay Heat Removal," dated October 17, 1988.

Wisconsin Public Service Corporation (WPSC) received notification of a possible 10 CFR Part 21 (part 21) defect from Westinghouse Electric Corporation on March 12, 1992. The subject of the Westinghouse letter is a phenomenon termed surge line flooding which may occur when a large pressurizer vent is used to support reduced reactor coolant inventory operations. Due to the complexity of this issue WPSC was not able to determine if surge line flooding represented a substantial safety hazard within the 60 day period allowed for in part 21. Therefore, an interim report was submitted (reference 1) in order to inform the NRC of the actions WPSC was taking to determine the safety significance of surge line flooding. WPSC stated that Westinghouse was performing an analysis for WPSC to determine the impact, if any, on the analyses that they performed for WPSC in response to Generic Letter 88-17 (reference 2). This analysis has been performed and the results indicate that surge line flooding can occur at the Kewaunee Nuclear Power Plant (KNPP) if core cooling is lost and boiling occurs. There are however, administrative controls that maintain physical barriers and a hot leg vent path which would prevent an inventory loss through a cold leg opening as described in the

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Westinghouse potential part 21 letter. Therefore, WPSC has determined that this phenomenon does not constitute a substantial safety hazard requiring part 21 notification.

As a result of the identification of this phenomenon and the new Westinghouse analysis, WPSC will revise the operating procedures for reduced inventory conditions prior to the next scheduled refueling outage at the KNPP (March 1993). In addition, a complete evaluation of the ability of the steam generator nozzle dams to serve as a hot leg to cold leg barrier during refueling conditions will be performed. In the interim, a copy of this letter and the new Westinghouse analysis will be routed to all operations personnel as required reading. If you have any questions please contact a member of my staff.

Sincerely,

C. A. Schrock

C. A. Schrock
Manager - Nuclear Engineering

PMF/jac

cc - US NRC - Region III
Mr. Patrick Castleman, US NRC

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