

WISCONSIN PUBLIC SERVICE CORPORATION

P.O. Box 19002, Green Bay, WI 54307-9002



PRIORITY ROUTING	
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FILE

July 22, 1985

Mr. R. L. Spessard, Director
 Division of Engineering
 U.S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Gentlemen:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
Inspection Report No. 50-305/84-15

References: 1) Letter from D. C. Hintz to W. S. Little dated February 15, 1985
 2) Letter from R. L. Spessard to D. C. Hintz dated April 19, 1985

Inspection Report 84-15 was issued following an inspection conducted at the Kewaunee Nuclear Power Plant by Messr. J. L. Ulie of your office.

Reference 1 provided our response to Inspection Report 84-15. In reference 2 additional information was requested. The attachment to this letter provides the additional information requested in reference 2.

Very truly yours,

A handwritten signature in dark ink, appearing to read "DCH".

D. C. Hintz
 Manager - Nuclear Power

DJM/js

Attach.

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

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ATTACHMENT

RESPONSE FOR ADDITIONAL INFORMATION

In your letter dated April 19, 1985, you requested the following additional information:

NRC REQUEST

- A. A list of all NFPA standards committed to or referenced in your Fire Hazards Analysis.

WPSC RESPONSE

The NFPA Guidelines listed below are referenced in the KNPP original Fire Hazards Analysis, dated 1977.

<u>NUMBER</u>	<u>TITLE</u>
4 - 1977	Organization for Fire Service
4A - 1969	Fire Department Organization
6 - 1974	Industrial Fire Loss Prevention
7 - 1974	Fire Emergencies Management
8 - 1974	Effects of Fire on Operations, Management Responsibility for
10 - 1975	Portable Fire Extinguishers
10-A-1975	Appendix "A", Portable Fire Extinguishers
12 - 1973	Carbon Dioxide Systems
12-A-1973	Halon 1301 Systems
12-B-1973	Halon 1211 Systems
13 - 1976	Sprinkler Systems, Installation
13A- 1976	Sprinkler Systems, Maintenance
14 - 1974	Standpipe and Hose Systems
15 - 1973	Water Spray Fixed Systems
16 - 1973	Foam-Water Sprinkler & Spray Systems
20 - 1973	Centrifugal Fire Pumps
24 - 1973	Outside Protection

<u>NUMBER</u>	<u>TITLE</u>
26 - 1958	Supervision of Valves
27 - 1975	Private Fire Brigades
30 - 1973	Flammable and Combustible Liquid Codes
49 - 1975	Hazardous Chemical Data
50A- 1973	Gaseous Hydrogen Systems
51 - 1976	Welding and Cutting, Oxygen Fuel - Gas Systems
51-B-1976	Cutting and Welding Processes
69 - 1973	Ventilation Battery Rooms
72-D-1975	Proprietary Signaling Systems
78 - 1977	Lightning Protection Code
80 - 1975	Fire Doors and Windows
92M -1972	Waterproofing and Draining of Floors
194 - 1974	Fire Hose Connections
196 - 1974	Fire Hose
197 - 1966	Initial Fire Attack, Training Sessions On
204 - 1968	Smoke & Heat Venting Guide
232AM 1972	Archives & Record Centers
490 - 1975	Storage of Ammonium Nitrate
493 - 1975	Intrinsically Safe Apparatus for use in Class I Hazardous Locations and it's Associated Apparatus
495 - 1973	Explosive Materials
496 - 1974	Purged and Pressurized Enclosures for Electrical Equipment in Hazardous Locations
498 - 1976	Explosives Motor Vehicle Terminals
601 - 1975	Guard Service in Fire Loss Prevention
802 - 1974	Nuclear Reactors

NRC REQUEST

- B. A statement of your current commitment to conformance to those NFPA standards identified in that list.

WPSC RESPONSE

The Kewaunee Nuclear Power Plant's Fire Hazards Analysis was intended to be a self-evaluation document used to assess the degree of compliance with BTP 9.5-1 and was valid for the time at which the review was conducted.

In looking at the Fire Protection Safety Evaluation Report (FPSE), (Tech. Spec. Amendment #23), issued December 12, 1978, a five (5) man NRC inspection team inspected this facility. The inspection team independently evaluated our Plant and, as a result of their inspection, twenty-eight (28) modifications were recommended to this facility before BTP 9.5-1 was satisfied. The inspection team's SER confirms our compliance with the criteria set in the Branch Technical Position 9.5-1 and Appendix A.

The standards listed in the Fire Protection Program Analysis did not imply verbatim compliance but rather were a commitment to apply these standards according to good engineering judgment, professional interpretation, and good fire protection practice in the design and operation of the Kewaunee Plant.

NRC REQUEST

- C. A statement defining your interpretation of the applicability of NFPA standards to the Kewaunee facility.

WPSC RESPONSE

The Kewaunee Nuclear Power Plant received its Construction Permit in 1968 and its Operating License in 1973, prior to the present-day fire protection guidelines. The high degree of compliance now found is a credit to WPSC's high professional standards of fire protection.

Mr. R. L. Spessard
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WPS interprets the applicability of NFPA standards to KNPP in the following manner.

Applicable NFPA standards will be observed in the design, construction, and operation of the KNPP according to professional interpretation and good fire protection practice.

The NFPA Standards applicable to Kewaunee will be updated concurrent with the Fire Hazards Analysis for 10 CFR 50 Appendix R, in a time frame commensurate with the completion commitment of the modifications to meet Appendix R requirements.