

50-305



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 20, 1999

Mr. M. L. Marchi  
Site Vice President - Kewaunee Plant  
Wisconsin Public Services Corporation  
P. O. Box 19002  
Green Bay, WI 54307-9002

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - COMPLETION OF LICENSING ACTION FOR GENERIC LETTER (GL) 98-04 (TAC NO. MA4059)

Dear Mr. Marchi:

On July 14, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued GL 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," to all holders of operating licenses or construction permits. The NRC issued GL 98-04 to determine the status of containment coating programs.

In GL 98-04, the NRC staff specifically requested that the licensees provide information outlined below for each of their facilities.

- (1) A summary description of the plant-specific program or programs implemented to ensure that Service Level 1 protective coatings used inside the containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant-specific licensing basis for the facility. Include a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures, or other guidance used for (a) controlling the procurement of coatings and paints used at the facility; (b) the qualification testing of protective coatings; and (c) surface preparation, application, surveillance, and maintenance activities for protective coatings. Maintenance activities refer to rework of degraded coatings, removing degraded coatings to sound coatings, correctly preparing the surfaces, applying new coating, and verifying the quality of coatings.
- (2) Information demonstrating compliance with item (i) or item (ii).
  - (i) For plants with licensing-basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related systems, structures, and components during a postulated design-basis loss-of-coolant accident, the following information shall be provided to demonstrate compliance:
    - (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
    - (b) The limit for the amount of unqualified protective coatings allowed in the

NRC FILE CENTER COPY

JFOI

PDR ADOCK

containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.

- (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling," and the functional capability of the safety-related containment spray system as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated November 12, 1998, for Kewaunee. This submittal provided the information requested by GL 98-04. Clarification was provided during a telephone call on September 22, 1999, from C. Lauron and R. Pulsifer of NRC with T. Webb and others of your staff. The NRC staff has reviewed your response and has concluded that all requested information has been provided; therefore, GL 98-04 is closed for your facility. Thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at (301) 415-1392.

Sincerely,



Tae Kim, Senior Project Manager, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-305

cc: See next page

- (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling," and the functional capability of the safety-related containment spray system as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated November 12, 1998, for Kewaunee. This submittal provided the information requested by GL 98-04. Clarification was provided during a telephone call on September 22, 1999, from C. Lauron and R. Pulsifer of NRC with T. Webb and others of your staff. The NRC staff has reviewed your response and has concluded that all requested information has been provided; therefore, GL 98-04 is closed for your facility. Thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at (301) 415-1392.

Sincerely,

Original signed by:  
 Tae Kim, Senior Project Manager, Section 1  
 Project Directorate III  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

Docket No. 50-305

cc: See next page

**DISTRIBUTION:**

File Center	OGC	JDavis
PUBLIC	ACRS	RPulsipher
PDIII-1 Reading	CLauron	MLeach, RIII

TO RECEIVE A COPY OF THIS DOCUMENT, WRITE A "C" IN THE BOX

OFFICE	PDIII-1/PM	C	EMCB		PDIII-1/LA	C	PDIII-1/SC	C
NAME	TJKim <i>TJK</i>		ESullivan <i>ES</i>		THarris <i>JdH</i>		CCraig <i>CC</i>	
DATE	12/14/99		12/15/99		12/14/99		12/20/99	

- (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling," and the functional capability of the safety-related containment spray system as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated November 12, 1998, for Kewaunee. This submittal provided the information requested by GL 98-04. Clarification was provided during a telephone call on September 22, 1999, from C. Lauron and R. Pulsifer of NRC with T. Webb and others of your staff. The NRC staff has reviewed your response and has concluded that all requested information has been provided; therefore, GL 98-04 is closed for your facility. Thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at (301) 415-1392.

Sincerely,  
 Original signed by:  
 Tae Kim, Senior Project Manager, Section 1  
 Project Directorate III  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

Docket No. 50-305

cc: See next page

**DISTRIBUTION:**

File Center	OGC	JDavis
PUBLIC	ACRS	RPulsipher
PDIII-1 Reading	CLauron	MLeach, RIII

TO RECEIVE A COPY OF THIS DOCUMENT, WRITE A "C" IN THE BOX

OFFICE	PDIII-1/PM	C	EMCB		PDIII-1/LA	C	PDIII-1/SC	C
NAME	TJKim <i>TJK</i>		ESullivan <i>ES</i>		THarris <i>JdH</i>		CCraig <i>CC</i>	
DATE	12/14/99		12/15/99		12/14/99		12/20/99	

Kewaunee Nuclear Power Plant  
Wisconsin Public Service Corporation

cc:

Foley & Lardner  
ATTN: Bradley D. Jackson  
One South Pinckney Street  
P.O. Box 1497  
Madison, WI 53701-1497

Chairman  
Town of Carlton  
Route 1  
Kewaunee, WI 54216

Harold Reckelberg, Chairman  
Kewaunee County Board  
Kewaunee County Courthouse  
Kewaunee, WI 54216

Attorney General  
114 East, State Capitol  
Madison, WI 53702

U.S. Nuclear Regulatory Commission  
Resident Inspectors Office  
Route #1, Box 999  
Kewaunee, WI 54216

Regional Administrator - Region III  
U.S. Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, IL 60532-4531

James D. Loock, Chief Engineer  
Public Service Commission  
of Wisconsin  
610 N. Whitney Way  
Madison, WI 53707-7854

M.L. Marchi  
Site Vice President-Kewaunee  
Wisconsin Public Service Corporation  
P.O. Box 19002  
Green Bay, WI 54307-9002