



Kewaunee Nuclear Power Plant
N490, State Highway 42
Kewaunee, WI 54216-9511
920-388-2560

Operated by
Nuclear Management Company, LLC



March 12, 2001

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

Ladies/Gentlemen:

Docket 50-305

Operating License DPR-43

Kewaunee Nuclear Power Plant

REQUEST FOR EXEMPTION FROM THE REQUIREMENTS OF 10CFR PART 50,
APPENDICES G AND H, AND 10CFR 50.61 (MASTER CURVE)

References:

- 1) Letter from M.L. Marchi (WPSC) to Document Control Desk (NRC) dated June 7, 1999
- 2) Letter from T.J. Kim (NRC) to M.L. Marchi (WPSC) dated July 16, 1999
- 3) Letter from C.M. Craig (NRC) to WPSC dated November 16, 1999
- 4) Letter from M. L. Marchi (WPSC) dated February 4, 2000
- 5) Letter from T.J. Kim (NRC) to Wisconsin Public Service Corporation dated July 20, 2000
- 6) Letter from Kenneth H. Weinbauer (WPSC) to Document Control Desk dated Sept. 26, 2000
- 7) Letter from Mark E. Reddemann (NMC) to Document Control Desk dated Dec. 18, 2000
- 8) Letter from John G. Lamb (NRC) to Mark Reddemann (NMC), titled, "Kewaunee Nuclear Power Plant - Request for Exemption from the Requirements of 10CFR 50, Appendices G and H, and 10CFR 50.61 (TAC NO. MA8585)", dated February 21, 2001

In reference 1 Wisconsin Public Service Corporation (WPSC) requested exemption to 10CFR 50.60, 10CFR 50.61, and Appendices G and H of Part 50 and proposed changes to the heatup and cooldown curves contained in the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS). In references 2 and 3 the Nuclear Regulatory Commission (NRC) staff requested additional information (RAI) to support NRC review of the proposed TS amendment and exemption request. In reference 4 WPSC provided the NRC staff with the requested information. Reference 5 summarizes a meeting between WPSC and the NRC and identifies two open items that needed to be resolved prior to completion of the staff's review. Reference 6 provided the Nuclear Management Company (NMC) response to the RAI's identified in reference 5. Reference 7 retracted our request for a TS amendment but continues our request for exemptions to 10 CFR 50.60, 10 CFR 50.61, and Appendices G and H of Part 50 that are described in our referenced submittals.

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By letter dated February 21, 2001 (reference 8) the NRC requested a written response from the NMC stating whether we (1) agree to use the methodology contained in the enclosure, (2) agree to make the stated changes, and (3) wish the NRC to continue to process the exemption request. This letter provides the NMC response to your request.

NMC agrees to use the methodology as revised by the NRC in the enclosure of reference 8. NMC will incorporate information obtained as part of KNPP's surveillance capsule program into the evaluation of the KNPP RPV, using the revised methodology. NMC also agrees to obtain the following information regarding KNPP's next reactor vessel radiation surveillance capsule:

- (a) A valid measurement of the fracture toughness-based T_0 parameter for the KNPP RPV surveillance weld,
- (b) an estimate of the Charpy V-notch 30 ft-lb transition temperature shift for the surveillance weld, and
- (c) an estimate of the upper shelf energy drop for the surveillance weld.

In closing, the NMC acknowledges and reiterates its desire for the NRC to continue to process the exemption request.

If you have any questions or require additional information, please feel free to contact either Mr. Jerry Riste at (920) 388-8424 or Mr. Chuck Tomes at (920) 433-1729.

Sincerely,



Kyle A. Hoops
Manager-Kewaunee Plant

GOR

cc - US NRC Region III
US NRC Senior Resident Inspector