



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

Operated by
Nuclear Management Company, LLC



April 6, 2001

10 CFR 50.90

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

Ladies/Gentlemen:

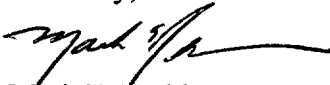
DOCKET 50-305
OPERATING LICENSE DPR-43
KEWAUNEE NUCLEAR POWER PLANT
PROPOSED AMENDMENT 175 TO THE KEWAUNEE NUCLEAR POWER PLANT
TECHNICAL SPECIFICATIONS

The Nuclear Management Company (NMC) is submitting this proposed amendment (PA) to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS) to revise Section 6.2, "Organization," and Section 6.13, "High Radiation Area," to reflect the title change from Shift Supervisor to Shift Manager. Kewaunee TS's require that changes affecting the organization be reflected in a TS amendment within 60 days. This transmittal satisfies that requirement.

Attachment 1 to this letter contains a description, a safety evaluation, a significant hazards determination and environmental considerations for the proposed change. Attachment 2 contains the strike-out Technical Specification pages: TS 6.2-1 and TS 6.13-2. Attachment 3 contains the affected Technical Specification pages as revised: TS 6.2-1 and TS 6.13-2.

In accordance with the requirements of 10 CFR 50.30(b), this submittal has been signed and notarized. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

Sincerely,


Mark E. Reddemann
Site Vice President

DAK

Attachments

cc - US NRC - Region III
US NRC Senior Resident Inspector
ElectricDivision,PSCW

Subscribed and Sworn to
Before Me This 6th Day
Of April, 2001
Jeanne M. Ferris
Notary Public, State of Wisconsin
My Commission Expires:
June 8, 2003

A001

ATTACHMENT 1

Letter from M. E. Reddemann (NMC)

To

Document Control Desk (NRC)

Dated

April 6, 2001

Proposed Amendment 175

Description of Proposed Changes

Safety Evaluation

Significant Hazards Determination

Environmental Consideration

Description of Proposed Changes

An administrative change is being proposed to revise the title of Shift Supervisor to Shift Manager. This change is being made to more accurately reflect the scope and significance of this position. The proposed change will not affect or alter the responsibilities or duties of the position.

Safety Evaluation for Proposed Changes

The proposed change is administrative in nature, and therefore, has no safety significance. The revision will not lower the safety or effectiveness of the organization. The title change from Shift Supervisor to Shift Manager does not change the intent of the Technical Specifications or the responsibilities of the position described.

Significant Hazards Determination for Proposed Changes

The proposed change was reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed change will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change will not alter the intent of the TS. Changing the title from Shift Supervisor to Shift Manager is administrative in nature. It has no impact on accident initiators or plant equipment, and thus, does not affect the probability or consequences of an accident.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not involve a change to the physical plant or operations. Since this is an administrative change it does not contribute to accident initiation. Therefore, it does not produce a new accident scenario or produce a new type of equipment malfunction.

3. Involve a significant reduction in the margin of safety.

Since this is an administrative change, it does not involve a significant reduction in the margin of safety. The proposed change does not affect plant equipment or operation. Safety limits and limiting safety system settings are not affected by this change.

Environmental Considerations

NMC has determined that this proposed amendment involves no significant hazards considerations and no significant change in the types of any effluents that may be released off-site and that there is no significant rise in individual or cumulative occupational radiation exposure. Accordingly, this proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this amendment.

ATTACHMENT 2

Letter from M. E. Reddemann (NMC)

to

Document Control Desk (NRC)

Dated

April 6, 2001

Proposed Amendment 175

Strike-Out TS Pages:

TS 6.2-1

TS 6.13-2

6.2 ORGANIZATION

a. Off-Site Staff

The off-site organization for plant management and technical support shall be as described in the Operational Quality Assurance Program Description.

b. Facility Staff

The plant organization shall be as described in the Operational Quality Assurance Program Description.

1. Each on-duty shift complement shall consist of at least:
 - A. One Shift ~~Supervisor~~Manager (SRO)
 - B. Two licensed Reactor Operators
 - C. Two Nuclear Auxiliary Operators
 - D. Deleted
 - E. One Radiation Technologist
2. While above COLD SHUTDOWN, the on-duty shift complement shall consist of the personnel required by TS 6.2.b.1 and an additional SRO.
3. In the event that one of the shift members becomes incapacitated due to illness or injury or the Radiation Technologist has to accompany an injured person to the hospital, reactor operations may continue with the reduced complement until a replacement arrives. In all but severe weather conditions, a replacement is required within two hours.
4. At least one licensed operator shall be in the control room when fuel is in the reactor.
5. Two licensed operators, one of which shall be an SRO, shall be present in the control room when the unit is in an operational MODE other than COLD SHUTDOWN or REFUELING.
6. REFUELING OPERATIONS shall be directed by a licensed SRO assigned to the REFUELING OPERATION who has no other concurrent responsibilities during the REFUELING OPERATION.
7. When the reactor is above the COLD SHUTDOWN condition, a qualified Shift Technical Advisor shall be within 10 minutes of the control room.

- b. In addition to the requirements of 6.13.a., areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose > 1000 mrem shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift ~~Supervisor/Manager~~ on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose > 1000 mrem⁽²⁾ that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, direct or remote (such as use of closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

⁽²⁾ Measurement made at 30 centimeters from source of radioactivity.

ATTACHMENT 3

Letter from M. E. Reddemann (NMC)

To

Document Control Desk (NRC)

Dated

April 6, 2001

Proposed Amendment 175

TS Pages:

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