



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

Point Beach Nuclear Plant
6610 Nuclear Road
Two Rivers, WI 54241
920-755-2321

*Kewaunee / Point Beach Nuclear
Operated by Nuclear Management Company, LLC*

October 22, 2001

10CFR50.90

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 179 TO THE KEWAUNEE NUCLEAR POWER PLANT
TECHNICAL SPECIFICATIONS 6.14, "POST-ACCIDENT SAMPLING AND
MONITORING"

In accordance with the provisions of 10 CFR 50.90, Nuclear Management Company, LLC, (NMC) is submitting a request for an amendment to change the Technical Specifications for the Kewaunee Nuclear Power Plant (KNPP).

The proposed amendment would revise the KNPP Technical Specification (TS) 6.14, "Post Accident Sampling and Monitoring," and thereby eliminate the requirements to have and maintain the Post Accident Sampling System (PASS). The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this Technical Specification improvement was announced in the Federal Register on October 31, 2000 as part of the Consolidated Line Item Improvement Process. Licensees are allowed to reference the model safety evaluation (SE) and no significant hazards consideration (NSHC) determination contained in the Federal Register notice until October 31, 2001. The KNPP Plant Operations Review Committee (PORC) and the Joint Off-Site Review Committee (JOSRC) have reviewed this amendment application.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant specific verifications. Attachment 2 provides the existing Technical Specification page, marked-up to show the proposed change. Attachment 3 provides the revised, clean Technical Specification page. Attachment 4 provides a summary of the licensing commitments made in this submittal.

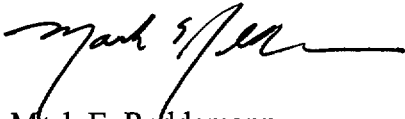
NMC requests approval of the proposed License Amendment by April 30, 2002, with the amendment being implemented within 120 days thereafter. The approval date was administratively selected to allow for NRC review but the plant does not require this amendment to allow continued safe full power operation.

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Docket 50-305
NRC-01-108
October 22, 2001
Page 2

A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1). If you should have any questions regarding this submittal, please contact Mr. Gerald Riste at (920) 388-8424.

Sincerely,



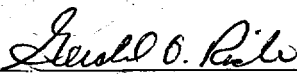
Mark E. Reddemann
Site Vice President – Kewaunee/Point Beach Plants

GOR

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|-------------|---|--|
| Attachments | 1 | Description and Assessment |
| | 2 | Strikeout Technical Specification Page |
| | 3 | Proposed Technical Specification Page |
| | 4 | List of Commitments |

cc - US NRC Region III
US NRC Senior Resident Inspector
Electric Division, PSCW

Subscribed and Sworn to
Before Me This 22 Day
Of October, 2001


Notary Public, State of Wisconsin

My Commission Expires:
February 27, 2005

ATTACHMENT 1

Letter from Mark E. Reddemann (NMC)

To

Document Control Desk (NRC)

Dated

October 22, 2001

Proposed Amendment 179

Description and Assessment

ATTACHMENT I

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

This proposed License Amendment Request (LAR) is a request pursuant to 10 CFR 50.90 to delete Technical Specification (TS) 6.14, "Post-Accident Sampling and Monitoring." Although TS 6.14's title contains the word "monitoring," elimination of this TS does not eliminate the post-accident monitoring instrumentation from KNPP TS. These instruments are contained in TS section 3.5, which are listed in TS Table 3.5-6, "Accident Monitoring Instrumentation Operating Conditions for Indication."

2.0 DESCRIPTION

The proposed License amendment deletes the program requirements of TS 6.14, "Post-Accident Sampling and Monitoring."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366 (Reference 1). The availability of this Technical Specification improvement was announced in Federal Register, Vol. 65, No. 211 (Reference 2), on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

3.0 BACKGROUND

Westinghouse Owners Group (WOG) topical report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," (Reference 3) evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. WCAP-14986-A, Rev. 2, concluded that the current PASS samples specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated.

4.0 TECHNICAL ANALYSIS

4.1 Applicability of Published Safety Evaluation

Nuclear Management Company, LLC (NMC) has reviewed the safety evaluation published as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Rev.2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10, 2000, and May 22, 2000). NMC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to the Kewaunee Nuclear Power Plant (KNPP) and justify this amendment for the incorporation of the changes to the KNPP Technical Specifications.

4.2 Optional Changes and Variations

KNPP is not proposing any variations or deviations from the technical specification changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

NMC has reviewed the proposed no significant hazards consideration determination published as part of the CLIIP. NMC has concluded that the proposed determination presented in the notice is applicable to KNPP and the determination is hereby incorporated, by reference to satisfy the requirements of 10 CFR 50.91(a).

5.2 Verification and Commitments

As discussed in the notice of availability published in Federal Register (Reference 2) for this Technical Specification improvement, plant-specific verifications were performed as follows:

1. NMC currently has contingency capability for obtaining and analyzing highly radioactive samples of the reactor coolant, containment sump, and containment atmosphere. The contingency plans are contained in the KNPP Emergency Plan Implementing Procedures (EPIPs).

Establishment of contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere is considered a regulatory commitment.

2. The capability for classifying fuel damage events at the Alert level threshold will be established for KNPP at radioactivity levels of 300 $\mu\text{Ci/ml}$ dose equivalent iodine. This capability will be described in the KNPP Emergency Plan Implementing Procedures (EPIPs), and will be implemented with the implementation of the License amendment. The capability for classifying fuel damage events will not require RCS radionuclides sampling.

The capability for classifying fuel damage events at the Alert level threshold is considered a regulatory commitment.

3. NMC currently has the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in the KNPP Emergency Plan Implementing Procedures (EPIPs).

The capability to monitor radioactive iodines that have been released offsite to the environs is considered a regulatory commitment.

6.0 ENVIRONMENTAL EVALUATION

NMC has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIIP. NMC has determined that the staff's findings presented in that evaluation are applicable to KNPP and the evaluation is hereby incorporated by reference for this application.

7.0 REFERENCES

1. Industry/TSTF Standard Technical Specification Change Traveler TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)."
2. Federal Register, Vol. 65, No. 211, "Notice of Availability for Referencing in License Amendment Applications Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process," dated October 31, 2000.
3. Westinghouse Owners Group (WOG) topical report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," July 2000.

ATTACHMENT 2

Letter from Mark E. Reddemann (NMC)

To

Document Control Desk (NRC)

Dated

October 22, 2001

Proposed Amendment 179

Strikeout TS Page

6.14 Deleted POST-ACCIDENT SAMPLING AND MONITORING

~~The licensee shall implement a program which will ensure the capability to monitor containment radiation levels, to obtain and analyze reactor coolant and containment atmosphere samples, and to monitor the plant gaseous effluent under accident conditions. The program shall be defined in nuclear administrative directives and will include the following:~~

- ~~a. Responsibilities for program implementation.~~
- ~~b. Delineation of instrumentation required.~~
- ~~c. Provisions for preventive maintenance and periodic surveillance of instrumentation.~~
- ~~d. Pre-planned procedures and back up instrumentation to be used if one or more monitoring instruments become inoperable.~~
- ~~e. Administrative procedures for returning inoperable instruments to OPERABLE status as soon as practicable.~~

ATTACHMENT 3

Letter from Mark E. Reddemann (NMC)

To

Document Control Desk (NRC)

Dated

October 22, 2001

Proposed Amendment 179

Proposed TS Page

6.14 Deleted

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ATTACHMENT 4

Letter from Mark E. Reddemann (NMC)

To

Document Control Desk (NRC)

Dated

October 22, 2001

Proposed Amendment 179

List of Commitments

LIST OF COMMITMENTS

The following table identifies those actions committed to by NMC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Gerald Riste, Licensing Leader, at (920)388-8424.

| COMMITMENT | Due Date/Event |
|---|---------------------------------------|
| <p>NMC currently has contingency capability for obtaining and analyzing highly radioactive samples of the reactor coolant, containment sump, and containment atmosphere. The contingency plans are contained in the KNPP Emergency Plan Implementing Procedures (EIPs).</p> <p>Establishment of contingency plans is considered a regulatory commitment.</p> | <p>Complete</p> |
| <p>The capability for classifying fuel damage events at the Alert level threshold will be established for KNPP at radioactivity levels of 300 μCi/ml dose equivalent iodine. This capability will be described in the KNPP Emergency Plan Implementing Procedures (EIPs), and will be implemented with the implementation of the License amendment.</p> <p>The capability for classifying fuel damage events at the Alert level threshold is considered a regulatory commitment.</p> | <p>Within 120 days after approval</p> |
| <p>NMC currently has the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in the KNPP Emergency Plan Implementing Procedures (EIPs).</p> <p>The capability to monitor radioactive iodines is considered a regulatory commitment.</p> | <p>Complete</p> |