ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9112230036 DOC.DATE: 91/12/12 NOTARIZED: NO DOCKET #
FACIL:50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Servic 05000305
AUTH.NAME AUTHOR AFFILIATION
STEINHARDT,C.R. Wisconsin Public Service Corp.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Proposed amend 98 to License DPR-43,revising T33.5.e to clarify mode applicability & required actions w/inoperable accident monitoring instrumentation channels,per NUREG-0737 item 2.8.2 & Generic Ltr 83-37.

DISTRIBUTION CODE: A002D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 5+2
TITLE: OR Submittal:Inadequate Core Cooling (Item II.F.2) GL 82-28

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD3-3 LA	1	1	PD3-3 PD	1	1
	HANSEN,A.	2	2			
INTERNAL:	ACRS	6	6	NRR KARSCH,R	1	1
	NRR SCHWENK,G	1	1	OC/LFMB	1	0
	REG FILE 01	1	1	RES DE	1	1
	RES/DSIR/EIB	1	1	RES/DSIR/RPSB	1	1
EXTERNAL:	NRC PDR	1	1	NSIC	1	1

R I D S / A D D S

R I D S / A D D S

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 19 ENCL 18

AA

WPSC (414) 433-1598
TELECOPIER (414) 433-5544

EASYLINK 62891993

WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

December 12, 1991

10 CFR 50.90

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 98 to the Kewaunee Nuclear Power Plant Technical Specifications, Addition of Operability and Surveillance Requirements for the Reactor Vessel Level Indication Instrumentation

This proposed amendment (PA) to the Kewaunee Technical Specifications (TS) is being submitted as a part of Wisconsin Public Service Corporation's (WPSCs) continuing effort to improve the quality and consistency of the document. Specifically, the intent of this PA is to add operability and surveillance requirements for the reactor vessel level indication instrumentation to the Kewaunee TS.

This instrumentation is part of the Inadequate Core Cooling Monitoring System which was installed in 1987 to fulfill the requirements of TMI Action Plan, NUREG-0737 item II.F.2, "Instrumentation for Detection of Inadequate Core Cooling." The PA to add TS requirements for this instrumentation is in accordance with the guidelines of NRC Generic Letter 83-37. Submitting this proposed change completes WPSCs implementation of the TMI Action Plan, NUREG-0737, Item II.F.2.

Attachment 1 to this letter contains a description, a safety evaluation, a significant hazards determination and environmental considerations. Attachment 2 contains the affected TS pages. The affected TS section and tables are being submitted in their entirety due to our conversion of the TSs to the WordPerfect software. Several administrative changes consisting of the correction of typographical errors and format changes resulting from this conversion process and are being submitted concurrent with the proposed technical changes.

A002
1/1

This PA has been reviewed and accepted by the Plant Operating Review Committee and the Kewaunee Plant Manager. In accordance with the requirements of I0 CFR 50.30(b), this submittal has been signed and notarized. A copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

Sincerely,

C. R. Steinhardt
Senior Vice President - Nuclear Power

SLB/jac

Attach.

cc - US NRC - Region III
Mr. Patrick Castleman, US NRC
Mr. R. S. Cullen, PSCW

Subscribed and Sworn to
Before Me This 13th Day
of December 1991

Notary Public, State of Wisconsin

My Commission Expires:
April 25, 1993

ATTACHMENT 1

To

Proposed Amendment No. 98

Letter from C. R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Dated

December 12, 1991

Description of the Proposed Change

Safety Evaluation

Significant Hazards Determination

Environmental Considerations

Description of Proposed Change to TS Section 3.5 "Instrumentation System"

A change is being proposed to TS 3.5.e to clarify the mode applicability and required actions with inoperable accident monitoring instrumentation channels. Specifically:

1) The first sentence of TS 3.5.e is being revised from "The instrumentation in Table 3.5-6 shall be operable" to "The accident monitoring instrumentation in Table TS 3.5-6 shall be operable whenever the plant is above HOT SHUTDOWN." Additionally, the sentence "A change in operational MODES or conditions is acceptable with an inoperable accident monitoring instrumentation channel." is being added to the specifications, and

2) Administrative changes are being made to convert TS section 3.5 to the WordPerfect software and correct minor typographical errors and format inconsistences.

Safety Evaluation for Proposed Change to TS 3.5.e

Revising the first sentence of TS 3.5.e clarifies the purpose and mode applicabilities of the Limiting Conditions for Operations (LCO) consistent with that provided in Table TS 3.5-6. This is an administrative change to enhance the consistency within the specifications. The proposed change does not alter the intent or the interpretation of the specification; therefore, this will not adversely affect the health and safety of the public.

The sentence "A change in operational MODES or conditions is acceptable with inoperable accident monitoring instrumentation channels" is also being added to enhance the consistency of the TSs and to provide guidance in the event of inoperable channels. The "Standard Technical Specifications for Westinghouse Pressurized Water Reactors", NUREG-0452 (STS), TS 3.3.3.6, on accident monitoring instrumentation channel operability has the action statement "The provisions of Specification 3.0.4 do not apply". Since the Kewaunee TSs do not have a 3.0 section similar to that of the STS, wording that would permit changes in operational modes or conditions is being proposed. The proposed statement provides clarification that does not currently exist in the TSs. This is an enhancement to the specifications and will not adversely affect the health and safety of the public. Moreover the proposed provision is consistent with Westinghouse STS 3.3.3.6 which has previously been approved by the NRC staff.

Significant Hazards Determination for Proposed Change to TS 3.5.e

The proposed change was revised in accordance with the provision 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 purpose of TS 3.6.e is to provide the operability, LCO and required actions for the accident monitoring instrumentation by reference to Table TS 3.6-5. The proposed revisions are to clarify the purpose and mode applicability of the LCO, and to add the provision that mode changes are permissible with inoperable instrumentation channels. These changes are administrative in nature and are intended to enhance the consistency within the specifications and provide clarification of allowed operating conditions with inoperable instrumentation channels. Therefore, the proposed change will not significantly increase the probability or consequences of an accident previously evaluated.

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

The proposed change does not involve a physical change to the plant, or affect operating parameters, setpoints or assumptions made in the Kewaunee Updated Safety Analysis Report (USAR). Therefore, it does not create the possibility of new or different kind of accident.

3) involve a significant reduction in the margin of safety.

The proposed change is intended to clarify TS 3.6.e. The mode applicability and channel description is consistent with that of Table TS 3.5-6. The addition of allowing mode

changes with inoperable channels is intended to provide additional guidance within the specification consistent with that previously approved by the NRC in the Westinghouse STSs. TS 3.6.e will allow the plant operators to make mode changes; however, plant operation above hot shutdown is still limited by the total allowed outage time. Therefore, the margin of safety is not reduced.

Safety Evaluation for Proposed Administrative Changes to Section TS 3.5

A number of formatting changes and correction of minor typographical errors are being included with this proposed change to TS Section 3.5. These changes are being proposed in conjunction with converting the TS document over to the WordPerfect software now being used at WPSC for word processing. These changes have been reviewed to ensure that they do not alter the intent or interpretation of the specifications; therefore, there is no affect on public health or safety.

Significant Hazards Determination for Proposed Administrative Changes to Section TS 3.5

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, or

2) create the possibility of a new or different kind of accident from any accident previously evaluated, or

3) involve a significant reduction in the margin of safety.

The proposed changes are administrative in nature and do not alter the intent or interpretation of the TS. Therefore, no significant hazards exist.

Additionally, the proposed change is similar to example C.2.e(i) in 51 FR 7751. Example C.2.e(i) states that changes which are purely administrative in nature; i.e. to achieve consistency throughout the technical specifications, correct an error, or change in nomenclature, are not likely to involve a significant hazard.

Description of Proposed Changes to Table TS 3.5-6 and Table TS 4.1-1

Changes to Table TS 3.5-6 "Instrumentation Operating Conditions For Indication" and Table TS 4.1-1 "Minimum Frequencies For Checks, Calibrations and Test of Instrument Channels" are being proposed to add operability and surveillance requirements for the reactor vessel level indication instrumentation. Specifically the changes are as follows:

1) Item No. 9 "Reactor Vessel Level Indication" is being added to Table TS 3.5-6 to provide operability requirements for the reactor vessel level indication instrumentation,

2) The footnotes on Table TS 3.5-6 are being revised to use the standard shutdown sequence terminology,

3) Item No. 40 "Reactor Vessel Level Indication" is being added to Table TS 4.1-1 to provide surveillance testing requirements for the reactor vessel level indication instrumentation, and

4) Administrative changes are being made to convert Tables TS 3.5-6 and TS 4.1-1 to the WordPerfect software and correct minor typographical errors and format inconsistencies.

Safety Evaluation for Proposed Change to Table TS 3.5-6 and Table TS 4.1-1

The reactor vessel level indication instrumentation is part of the Inadequate Core Cooling Monitoring System (ICCMS) which was installed in 1987 to fulfill the requirements of TMI Action Plan, NUREG-0737 item II.F.2, "Instrumentation for Detection of Inadequate Core Cooling". The NRC staff has reviewed and accepted KNPP's ICCMS design as documented in a safety evaluation from T. R. Quay (NRC) to D.C. Hintz (WPSC) dated June 10, 1987. The purpose of the proposed changes to Table TS 3.5-6 and TS 4.1-1 is to add TS requirements for

the reactor vessel level indication instrumentation in accordance with the guidelines of Generic Letter 83-37.

Specifically, the conditions and action statements for one and two instrumentation channels inoperable are being added to Table TS 3.5-6 "Instrumentation Operating Conditions For Indication" in a format consistent with the other accident monitoring instrumentation channels at the KNPP. This proposed revision is an additional requirement in the TSs to ensure the availability and reliability of the indication instrumentation; therefore, this change will not adversely affect the health and safety of the public.

In the footnotes on Table TS 3.5-6 the phrase "or be in at least hot shutdown within the next 12 hours" is being replaced with the standard shutdown sequence terminology to ensure consistency within the specifications. The proposed change is more restrictive than the existing specification and does not alter the intent or the interpretation of the specification; therefore, there is no effect on public health or safety.

The surveillance requirements for the reactor vessel level indication instrumentation are being added to Table TS 4.1-1 "Minimum Frequencies For Checks, Calibrations and Test of Instrument Channels" in a format consistent with the other accident monitoring instrument channels at the KNPP. This proposed revision is an additional requirement in the TSs to ensure

the availability and reliability of the indication instrumentation; therefore, this change will not adversely affect the health and safety of the public.

Submitting this proposed change completes WPSC implementation of the TMI Action Plan, NUREG-0737, Item II.F.2.

Significant Hazards Determination for Proposed Changes to Table TS 3.5-6 and Table TS 4.1-1

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 purpose of the reactor vessel level indication instrumentation is to provide the operators information on the reactor vessel coolant inventory in the unlikely event of a design basis or beyond design basis accident. The indication instrumentation, as part of the ICCMS, was installed at KNPP in response to TMI Action Plan, NUREG-0737, item II.F.2. The NRC staff has reviewed and accepted the ICCMS design at the KNPP.

The reactor vessel level indication instrumentation has been in operation since it was installed in 1987. The proposed TS changes will not change the operation of the indication instrumentation as previously described to the NRC in earlier submittals. The intent of adding operability requirements, LCO, action statements and surveillance requirements to the TSs is to ensure the reliability and availability of the indication instrumentation. The proposed change is an additional restriction not presently included in the TSs; therefore, it will not increase the probability or consequences of an accident previously evaluated.

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

The proposed change does not alter the plant configuration or overall plant performance; therefore, it does not create the possibility of a new or different kind of accident.

3) involve a significant reduction in the margin of safety.

The proposed change will add requirements to the TSs to ensure the availability and reliability of the reactor vessel level indication instrumentation. This is an enhancement from an overall safety standpoint and therefore does not reduce the margin of safety.

Additionally, the proposed change is similar to example C.2.e(ii) in 51 FR 7751. Example C.2.e(ii) states that changes that constitute an additional limitation, restriction or control not presently included in the TSs are not likely to involve a significant hazard.

Safety Evaluation for Proposed Administrative Changes to Table TS 3.5-6 and Table TS 4.1-1

A number of formatting changes and correction of minor typographical errors are being included with this proposed TS change. These changes are being proposed in conjunction with converting the TS document over to the WordPerfect software now being used at WPSC for word processing. Among these changes are, changing the title of Table TS 3.5-6 to add the phrase "accident monitoring", consolidating the footnotes and remarks columns and boxing in the tables to give the specification a neater appearance. These changes have been reviewed to ensure that they do not alter the intent or interpretation of the specification; therefore, there is no effect on public health or safety.

Significant Hazards Determination for Proposed Administrative Changes to Table TS 3.5-6 and Table TS 4.1-1

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, or

2) create the possibility of a new or different kind of accident from any accident previously evaluated, or

3) involve a significant reduction in the margin of safety.

The proposed changes are administrative in nature and do not alter the intent or interpretation of the TS. Therefore, no significant hazards exist.

Additionally, the proposed change is similar to example C.2.e(i) in 51 FR 7751. Example C.2.e(i) states that changes which are purely administrative in nature; i.e. to achieve consistency throughout the technical specifications, correct an error, or a change in nomenclature, are not likely to involve a significant hazard.

Environmental Considerations

This proposed amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR part 20, or change to a surveillance requirement. WPSC has determined that the proposed amendment

involves no significant hazards considerations and no significant change in the types of any effluents that may be released offsite and that there is no significant increase 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 proposed amendment.