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SUBJECT: Forwards proposed Tech Spec Amend 40 re fire protection.

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OCT 26 1979

APP 4

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WISCONSIN PUBLIC SERVICE CORPORATION

P.O. Box 1200, Green Bay, Wisconsin 54305

October 19, 1979

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention Mr. A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

Gentlemen:

Docket 50-305
Operating License DPR-43
Proposed Technical Specification Amendment No. 40
Fire Protection

Enclosed please find forty (40) copies of proposed Amendment No. 40 to the Kewaunee Nuclear Power Plant Technical Specifications. The purpose of this amendment is to add those fire protection systems previously committed to in Amendment No. 23, to delete the modifications required as a condition to our license, to add a requirement of a five man fire response team, and to correct several wording inconsistencies of the previous specification.

We have to date completed all the modifications and satisfied all commitments made with respect to fire protection with the exception of the screenhouse corridor sprinkler system. This last modification will be completed by January 1, 1980. As of that date the condition to our license enacted by Amendment No. 23 would have been satisfied and should be deleted from the license.

Response to Item 3 in our February 15, 1979, letter provided a commitment to prepare a formal procedure for the actions to be taken in the event of a relay room fire. The basic steps of that procedure were submitted for review. Specific comments from the NRC staff were received with respect to the timing of implementing certain steps, e.g. starting the SI pumps. Those comments were reviewed and will be incorporated in the procedure by January 1, 1980.

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This proposed amendment is exempt from an application fee because this application does not constitute a new or additional review by the NRC staff. The Technical Specification changes submitted herein constitute previously reviewed material which was initiated prior to the March 23, 1978, implementation of 10 CFR 70.

Very truly yours,

E. R. Mathews

E. R. Mathews, Vice President
Power Supply & Engineering

snf

Enc.

Subscribed and Sworn to
Before Me This 19th Day
of October 1979

Notary Public, State of Wisconsin

My Commission Expires
September 28, 1980

Section C of the Kewaunee Plant Operating License should be changed as follows:

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR, Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensees are authorized to operate the facility at steady state reactor core power levels not in excess of 1650 megawatts (thermal).

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 30, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications."

(3) Deleted

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(4) The licensee shall maintain in effect and fully implement all provisions of the Commission-approved physical security plan, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p). The approved security plan documents, withheld from public disclosure pursuant to 10 CFR 2.790(d), are collectively titled "Industrial Security Manual" dated May 25, 1977, January 9, 1978, December 18, 1978, January 30, 1979, March 7, 1979 and March 27, 1979."

Specification 6.9.2 within the next 30 days.

4. With no fire water systems operable:

   A. Establish a backup fire water system within 24 hours.

   B. Submit a report in accordance with Specification 6.9.2;

      a) By telephone within 24 hours, and

      b) In writing no later than the first working day following the event, and

      c) In writing within 14 days following the event, outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

c. Spray And/Or Sprinkler Systems

Whenever equipment in spray and/or sprinkler protection areas is required the following spray and/or sprinkler systems shall be OPERABLE:

1. Special Ventilation Room AX-23
2. Cable Tray Sprinkler System (AX-32)
3. Screenhouse Sprinkler System

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With one or more of the above required spray and/or sprinkler systems inoperable, establish backup fire suppression equipment for the unprotected area(s) within one hour; restore the system to OPERABLE status within 14 days or submit a report to the Commission pursuant to Specification 6.9.2 within the next 30 days.

d. Low Pressure CO_2 Systems

Whenever equipment in the low pressure CO_2 protected areas is required to be OPERABLE, the following low pressure CO_2 systems shall be OPERABLE with a minimum of 60% indicated level and a minimum pressure of 295 psig in the associated storage tank(s).

1. Diesel Generator 1A, TU-90 and day tank room, TU-91

2. Diesel Generator 1B, TU-92 and day tank room, TU-93

TABLE TS 3.15-1

FIRE DETECTION INSTRUMENTATION

Fire Area		Detectors	Minimum # Required	Required Actions	
AX-21	4160 Switchgear Room	3	2	Establish an hourly fire watch inspection	
AX-23	Special Vent Filter Housings	9	9	If filter housing is in operation with charcoal filters in service establish an hourly fire watch inspection. If not in service establish a 4-hour inspection frequency.	40
AX-23	Auxiliary Building	4	2	Establish an hourly fire watch inspection	40
AX-24	Fuel Handling Area	3	3	Establish an hourly fire watch inspection	
AX-30	Relay Room	19	6	Establish an hourly fire watch inspection	
AX-32	Cable run area	11	8	Establish an hourly fire watch inspection	
AX-35	Control Room	13	0	Control room is continuously manned	
AX-37	CRD Room	7	4	Establish an hourly fire watch inspection	
SB-65	Shield Building	6	2	Establish a four hour fire watch inspection	
SC-70	Screenhouse	4	2	Establish an hourly fire watch inspection	
TU-90/91	D/G 1A and day tank room	7	5	Establish an hourly fire watch inspection	
TU-92/93	D/G 1B and day tank room	7	5	Establish an hourly fire watch inspection	
TU 94	Cardox Room	1	1	Establish an hourly fire watch inspection	40
TU 95	Air Compressor & Pump Room	5	4	Establish an hourly fire watch inspection	
TU 97	Battery Room 1A	1	1	Establish an hourly fire watch inspection	
TU 98	Battery Room 1B	1	1	Establish an hourly fire watch inspection	

4.15 FIRE PROTECTION SYSTEM

Applicability

Applies to the testing and surveillance requirements for the fire protection equipment addressed in Specification 3.15.

Objective

Verify performance capability of the fire protection system.

Specification

a. Fire Detection Instrumentation

1. At least the minimum required number of fire detection instruments in Table TS 3.15-1 shall be demonstrated OPERABLE semi-annually by performance of a CHANNEL FUNCTIONAL TEST. Those detectors that are of the fusible link type shall be verified operable by visual inspection.

2. Deleted | 40

b. Fire Water System

The fire water system shall be demonstrated OPERABLE:

1. Each pump shall be tested monthly in accordance with Table TS 4.1-3.

2. At least once per 12 months by verifying that each valve (manual, power operated or automatic) in the flow path is in its correct position, and by cycling each testable valve in the flow path through at least one complete cycle of full travel.

3. At least once per 12 months by performance of a system flush.

4. At least once per 18 months by performing a system functional test which includes simulated automatic actuation of the system throughout its operating sequence, and:

   a) Verifying that each pump develops at least 1800 gpm at a system head of 310 feet,

   b) Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel, and

c) Verifying that each high pressure pump auto-start setpoint is ≥100 psig. 25

5. Deleted 40

c. Spray/Sprinkler Systems

Each of the spray and/or sprinkler systems in Specification 3.15.c shall be demonstrated OPERABLE:

1. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.

2. At least once per 18 months:

   a) By performing a system functional test which includes simulated automatic actuation of the system, and:

      1. Verifying that the automatic valves in the flow path actuate to their correct positions, and

      2. Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel.

   b) By visual inspection of the spray headers to verify their integrity, and

   c) By visual inspection of each nozzle to verify no blockage.

3. At least once per three years by performing an air flow test through each open head spray/sprinkler header and verifying each open head spray/sprinkler nozzle is unobstructed.

d. Low Pressure CO_2 Systems

Each of the low pressure CO_2 systems in Specification 3.15.d shall be demonstrated OPERABLE:

1. At least once per 7 days by verifying CO_2 storage tank level and pressure, and

2. At least once per 18 months by verifying:

   a) The system valves and associated ventilation dampers actuate manually and automatically, upon receipt of a simulated actuation signal, and

b) Flow from each nozzle during a "Puff Test."

e. Fire Hose Stations

Each of the fire hose stations shown in Table TS 3.15-2 shall be demonstrated OPERABLE:

1. Monthly:

   a) Visual inspection of the station to assure all required equipment is at the station, and

2. At least once per 18 months by:

   a) Removing the hose for inspection and reracking, and

   b) Replacement of all degraded gaskets in couplings.

3. At least once per three years by:

   a) Partially opening each hose station valve to verify valve OPERABILITY and no flow blockage.

   b) Conducting a hose hydrostatic test at a pressure of at least 160 psig.

f. Penetration Fire Barriers

Each of the required penetration fire barriers shall be verified to be intact by a visual inspection:

1. At least once per 18 months, and

2. Prior to declaring a penetration fire barrier functional following repairs or maintenance.

BASES

Fire Detection Instrumentation

Failure of a fire detection instrument results in an alarm to the control room Control Panel and local panels and, thus, an annual functional test is adequate to detect otherwise failed detector. 40

Fire Water System

Both pumps in the system shall be individually tested monthly. The fire water system consists of a 12" 40

c. At least one licensed operator shall be in the control room when fuel is in the reactor.

d. At least two licensed operators shall be present in the control room during reactor startup, turbine generator synchronization to the grid, and during recovery from reactor trips.

e. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. This individual may be one of the shift operators.

f. Refueling operations shall be directed by a licensed Senior Reactor Operator assigned to the refueling operation who has no other concurrent responsibilities during the refueling operation.

g. A five man fire response team, consisting of 3 Fire Brigade members and 2 Assistant Fire Brigade personnel, shall be maintained. If a member of the fire response team becomes incapacitated due to illness or injury this requirement is deemed satisfied if a replacement arrives within two hours in all but the severest weather. 40

6.3 PLANT STAFF QUALIFICATIONS

6.3.1 Qualifications of each member of the Plant Staff shall meet or exceed the minimum acceptable levels of ANSI-N18.1-1971 for comparable positions.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the Plant Staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI-N18.1-1971 and Appendix A of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Fire Marshall and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except that training sessions shall be held quarterly. 20