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ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Serial No. 16-098
LIC/JG/R0
Docket No.: 50-305
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
TECHNICAL SPECIFICATIONS BASES CHANGES AND TECHNICAL REQUIREMENTS MANUAL CHANGES

Pursuant to Kewaunee Power Station (KPS) Technical Specification 5.5.12, "Technical Specifications (TS) Bases Control Program," Dominion Energy Kewaunee, Inc. (DEK) is required to provide, on a frequency consistent with 10 CFR 50.71(e), changes to the TS Bases that were implemented without prior NRC approval. However, there have been no changes to the TS Bases that were implemented without prior Nuclear Regulatory Commission (NRC) approval since our April 3, 2014 submittal (Reference 1).

DEK is similarly required to submit changes to the KPS Technical Requirements Manual (TRM) because the KPS TRM is a part of the Updated Safety Analyses Report (USAR) by reference.

The attachments provide copies of the TRM pages and TRM current page list reflecting the changes implemented since April 2014.

The changes to the TRM were made in accordance with the provisions of 10 CFR 50.59 and approved by the KPS Facility Safety Review Committee.

Please contact Mr. Jack Gadzala at 920-388-8604 if you have questions or require additional information,.

Stewart J. Yuen
Manager, Kewaunee Power Station

Reference:

1. Letter from Jeffrey T. Stafford (DEK) to NRC Document Control Desk, "Technical Specifications Bases Changes and Technical Requirements Manual Changes," dated April 3, 2014 (ADAMS Accession No. ML13108A183).

A001
NRR

Attachments:
1. Kewaunee Power Station Technical Requirements Manual Changes
2. Kewaunee Power Station Technical Requirements Manual Current Page List

Commitments made by this letter: NONE

cc: Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

ATTACHMENT 1

TECHNICAL SPECIFICATIONS BASES CHANGES AND TECHNICAL REQUIREMENTS MANUAL CHANGES

TECHNICAL REQUIREMENTS MANUAL CHANGES

TRM PAGES:

TRM 7.0-1 through 7.0-12 Rev 0	Issued 2/16/2016
TRM 8.7.9-1 through 8.7.9-7 Rev 3	Issued 2/24/2015
TRM 8.7.10-1 through 8.7.10-6 Rev 1	Issued 12/04/2014
TRM 8.7.11-1 through 8.7.11-4 Rev 1	Issued 12/04/2014
TRM 8.7.12-1 through 8.7.12-5 Rev 1	Issued 12/04/2014
TRM 8.8.1-2 Rev 3	Issued 6/26/2014
TRM 8.8.1-1 Rev 4	Issued 4/23/2015
TRM 8.8.1-3 through 8.8.1-4 Rev 4	Issued 4/23/2015
TRM 8.8.1-6 Rev 4	Issued 4/23/2015
TRM 8.8.2-1 through 8.8.2-3 Rev 4	Issued 7/31/2014
TRM 8.8.2-1 through 8.8.2-4 Rev 5	Issued 4/23/2015
TRM Section 8.8.3 Rev 2	Deleted
TRM 8.9.1-1 Rev 2	Issued 7/24/2014
TRM 8.9.1-3 through 8.9.1-5 Rev 2	Issued 7/24/2014
TRM 8.9.4-2 Rev 3	Issued 6/26/2014
TRM 10.2-1 Rev 0	Issued 8/21/2014
TRM Section 10.3 Rev 0	Deleted
TRM Section 10.4 Rev 0	Deleted

7.0 USE AND APPLICATION

7.1 Definitions

----------NOTES----------

1. The defined terms of this section appear in capitalized type and are applicable throughout the TRM and the TRM Bases.

Term	Definition
ACTIONS	ACTIONS shall be that part of a Specification that prescribes CONTINGENCY MEASURES to be taken under designated Nonconformances within specified Restoration Times.
CHANNEL CALIBRATION	A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel FUNCTIONALITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps.
CHANNEL CHECK	A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.
CHANNEL FUNCTIONAL TEST	A CHANNEL FUNCTIONAL TEST consists of injecting a simulated signal into the channel as close to the primary sensor as practicable to verify that it is FUNCTIONAL, including alarm and/or trip initiating action.
CONTINGENCY MEASURES	CONTINGENCY MEASURES shall be that part of a Requirement that prescribes CONTINGENCY MEASURES to be taken under designated Nonconformances within specified Restoration Times.

FUNCTIONAL – FUNCTIONALITY	A structure, system or component (SSC), shall be FUNCTIONAL or have FUNCTIONALITY when it is capable of performing its specified function(s) as set forth in the Current License Basis. FUNCTIONALITY does not apply to specified safety functions, but does apply to the ability of non-TS SSCs to perform other specified functions that have a necessary support function.
TECHNICAL NORMAL CONDITIONS (TNC)	Specify minimum requirements for ensuring safe management (storage and movement) of irradiated fuel. The CONTINGENCY MEASURES associated with a TNC state Nonconformances that typically describe the ways in which the requirements of the TNC can fail to be met. Specified with each stated Nonconformance are CONTINGENCY MEASURES and Restoration Time(s).
TECHNICAL VERIFICATION REQUIREMENTS (TVR)	TVRs are requirements relating to test, calibration, or inspection to assure that the necessary FUNCTIONALITY of systems and components are maintained, that facility operation will be maintained within the current licensing basis, and that the TNC for operation will be met.

7.2 Logical Connectors	Logical Connectors are applicable throughout the Technical Requirements Manual and Bases.
PURPOSE	The purpose of this section is to explain the meaning of logical connectors. Logical connectors are used in the TRM to discriminate between, and yet connect, discrete NONCONFORMANCES, CONTINGENCY MEASURES, Restoration Times, TVRs, and Frequencies. The only logical connectors that appear in the TRM are AND and OR. The physical arrangement of these connectors constitutes logical conventions with specific meanings.
BACKGROUND	Several levels of logic may be used to state CONTINGENCY MEASURES. These levels are identified by the placement (or nesting) of the logical connectors and by the number assigned to each CONTINGENCY MEASURE. The first level of logic is identified by the first digit of the number assigned to a CONTINGENCY MEASURE and the placement of the logical connector in the first level of nesting (i.e., left justified with the number of the CONTINGENCY MEASURE). The successive levels of logic are identified by additional digits of the CONTINGENCY MEASURE number and by successive indentations of the logical connectors. When logical connectors are used to state a Nonconformance (condition), Restoration Time, TVR, or Frequency, only the first level of logic is used, and the logical connector is left justified with the statement of the Nonconformance, Restoration Time, TVR, or Frequency.
EXAMPLES	The following examples illustrate the use of logical connectors. EXAMPLE 7.2-1 ACTIONS

NONCONFORMANCE	CONTINGENCY MEASURES	RESTORATION TIME
A. TNC not met.	A.1 Verify . . . AND A.2 Restore . . .	

In this example the logical connector AND is used to indicate that when in Nonconformance A, both CONTINGENCY MEASURES A.1 and A.2 must be completed.

EXAMPLES (continued)

EXAMPLE 7.2-2

ACTIONS

NONCONFORMANCE	CONTINGENCY MEASURES	RESTORATION TIME
A. TNC not met.	A.1 Trip . . . OR A.2.1 Verify . . . AND A.2.2.1 Reduce . . . OR A.2.2.2 Perform . . . OR A.3 Align . . .	

This example represents a more complicated use of logical connectors. CONTINGENCY MEASURES A.1, A.2, and A.3 are alternative choices, only one of which must be performed as indicated by the use of the logical connector OR and the left justified placement. Any one of these three actions may be chosen. If A.2 is chosen, then both A.2.1 and A.2.2 must be performed as indicated by the logical connector AND. CONTINGENCY MEASURE A.2.2 is met by performing A.2.2.1 or A.2.2.2. The indented position of the logical connector OR indicates that A.2.2.1 and A.2.2.2 are alternative choices, only one of which must be performed.

7.3 Restoration Times

Restoration Times are applicable throughout the Technical Requirements Manual.

When "Immediately" is used as a Restoration Time, the CONTINGENCY MEASURE should be pursued without delay in a controlled manner.

PURPOSE

The purpose of this section is to establish the Restoration Time convention and to provide guidance for its use.

BACKGROUND	The CONTINGENCY MEASURES associated with a TNC state Nonconformances (conditions) that typically describe the ways in which the requirements of the TNC can fail to be met. Specified with each stated Nonconformance are CONTINGENCY MEASURE(s) and Restoration Time(s).
DESCRIPTION	The Restoration Time is the amount of time allowed for completing a CONTINGENCY MEASURE. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS condition unless otherwise specified, providing the facility is in a specified condition stated in the Applicability of the TNC. CONTINGENCY MEASURES must be completed prior to the expiration of the specified Restoration Time. An ACTIONS condition remains in effect and the CONTINGENCY MEASURES apply until the condition no longer exists or the facility is not within the TNC Applicability. If situations are discovered that require entry into more than one condition at a time within a single TNC (multiple conditions), the CONTINGENCY MEASURES for each condition must be performed within the associated Restoration Time. When in multiple conditions, separate Restoration Times are tracked for each condition starting from the time of discovery of the situation that required entry into the condition. Once a condition has been entered, subsequent trains, subsystems, components, or variables expressed in the condition, discovered to be nonfunctional or not within limits, will <u>not</u> result in separate entry into the condition, unless specifically stated. The CONTINGENCY MEASURES of the condition continue to apply to each additional failure, with Restoration Times based on initial entry into the condition. However, when a <u>subsequent</u> train, subsystem, component, or variable expressed in the condition is discovered to be nonfunctional or not within limits, the Restoration Time(s) may be extended. To apply this Restoration Time extension, two criteria must first be met. The subsequent nonfunctional condition: a. Must exist concurrent with the <u>first</u> nonfunctional condition; and b. Must remain nonfunctional or not within limits after the first nonfunctional condition is resolved. The total Retoration Time allowed for completing a CONTINGENCY MEASURE to address the subsequent nonfunctional condition shall be limited to the more restrictive of either: a. The stated Restoration Time, as measured from the initial entry into the condition, plus an additional 24 hours; or

DESCRIPTION (continued)

b. The stated Restoration Time as measured from discovery of the subsequent nonfunctional condition.

The above Restoration Time extensions do not apply to those requirements that have exceptions that allow completely separate re-entry into the condition (for each train, subsystem, component, or variable expressed in the condition) and separate tracking of Restoration Times based on this re-entry. These exceptions are stated in individual requirements.

The above Restoration Time extension does not apply to a Restoration Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Restoration Time is referenced from a previous completion of the CONTINGENCY MEASURE versus the time of condition entry) or as a time modified by the phrase "from discovery . . ."

EXAMPLES

The following example illustrates the use of Restoration Times with different types of nonconformances and changing nonconformances.

EXAMPLE 7.3-1

ACTIONS

NONCONFORMANCE	CONTINGENCY MEASURES	RESTORATION TIME
A. One pump Nonfunctional.	A.1 Restore pump to FUNCTIONAL status.	7 days
B. CONTINGENCY MEASURE and associated Restoration Time not met.	B.1 Verify.... AND B.2 Initiate....	6 hours 36 hours

When a pump is declared nonfunctional, Nonconformance A is entered. If the pump is not restored to FUNCTIONAL status within 7 days, Nonconformance B is also entered and the Restoration Time clocks for CONTINGENCY MEASURES B.1 and B.2 start. If the nonfunctional pump is restored to FUNCTIONAL status after Nonconformance B is entered, Nonconformances A and B are exited, and therefore, the CONTINGENCY MEASURES of Nonconformance B may be terminated.

EXAMPLES (continued)	Nonconformance B has two CONTINGENCY MEASURES. Each CONTINGENCY MEASURE has its own separate Restoration Time. Each Restoration Time is referenced to the time that Nonconformance B is entered. The CONTINGENCY MEASURES of Nonconformance B are to perform the verification required by MEASURE B.1 within 6 hours AND perform the restoration required by MEASURE B.2 within 36 hours. A total of 6 hours is allowed for performing MEASURE B.1 and a total of 36 hours (not 42 hours) is allowed for performing MEASURE B.2 from the time that Nonconformance B was entered. If MEASURE B.1 is completed within 3 hours, the time allowed for completing MEASURE B.2 is the next 33 hours because the total time allowed for completing MEASURE B.2 is 36 hours. If Nonconformance B is entered while performing the verification required by MEASURE B.1, the time allowed for completing MEASURE B.2 is the next 36 hours.
IMMEDIATE RESTORATION TIME	When "Immediately" is used as a Restoration Time, the CONTINGENCY MEASURE should be pursued without delay and in a controlled manner.

7.4 Frequency	Frequency is applicable throughout the Technical Requirements Manual and Bases.
PURPOSE	The purpose of this section is to define the proper use and application of Frequency requirements.
DESCRIPTION	Each TECHNICAL VERIFICATION REQUIREMENT (TVR) has a specified Frequency in which the Verification must be met in order to meet the associated TNC. An understanding of the correct application of the specified Frequency is necessary for compliance with the TVR. The "specified Frequency" is referred to throughout this section and each of the Specifications of Section 7.6, "TECHNICAL VERIFICATION REQUIREMENT (TVR) Applicability." The "specified Frequency" consists of the requirements of the Frequency column of each TVR as well as certain Notes in the Verification column that modify performance requirements. Sometimes special situations dictate when the requirements of a Verification are to be met. They are "otherwise stated" conditions allowed by TVR 7.6.1. They may be stated as clarifying Notes in the Verification, as part of the Verification or both.

DESCRIPTION (continued)

The TVR (i.e., the Verification or the Frequency) is stated such that it is only "required" when it can be and should be performed.

The use of "met" or "performed" in these instances conveys specific meanings. A Verification is "met" only when the acceptance criteria are satisfied. Known failure of the requirements of a Verification, even without a Verification specifically being "performed," constitutes a Verification not "met." "Performance" refers only to the requirement to specifically determine the ability to meet the acceptance criteria.

EXAMPLES

The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the TNC (TNC not shown) is the applicable specified condition.

EXAMPLE 7.4-1

TECHNICAL VERIFICATION REQUIREMENTS

VERIFICATION	FREQUENCY
Perform CHANNEL CHECK.	12 hours

Example 7.4-1 contains the type of TVR most often encountered in the TRM. The Frequency specifies an interval (12 hours) during which the associated Verification must be performed at least one time. Performance of the Verification initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the stated Frequency is allowed by TVR 7.6.2 for operational flexibility. The measurement of this interval continues at all times, even when the TVR is not required to be met per TVR 7.6.1 (such as when the equipment is nonfunctional, a variable is outside specified limits, or the unit is outside the Applicability of the TNC). If the interval specified by TVR 7.6.2 is exceeded while the facility is in a specified condition in the Applicability of the TNC, and the performance of the Verification is not otherwise modified, then TVR 7.6.3 becomes applicable.

If the interval as specified by TVR 7.6.2 is exceeded while the facility is not in a specified condition in the Applicability of the TNC for which performance of the TVR is required, then the required TVRs must be satisfied prior to the facility entering the Applicability of the TNC or the corrective action process specified in TVR 7.6.3 must be complied with prior to the facility entering the Applicability of the TNC.

EXAMPLES
(continued)

EXAMPLE 7.4-2

TECHNICAL VERIFICATION REQUIREMENTS

VERIFICATION	FREQUENCY
Verify flow is within limits.	Once within 12 hours after entry into the applicable condition AND 24 hours thereafter

Example 7.4-2 has two Frequencies. The first is a one time performance Frequency, and the second is of the type shown in Example 7.4-1. The logical connector "AND" indicates that both Frequency requirements must be met. Each time the applicable condition is entered, the Verification must be performed within 12 hours.

The use of "once" indicates a single performance will satisfy the specified Frequency (assuming no other Frequencies are connected by "AND"). This type of Frequency does not qualify for the 25% extension allowed by TVR 7.6.2. "Thereafter" indicates future performances must be established per TVR 7.6.2, but only after a specified condition is first met (i.e., the "once" performance in this example). If the applicable condition is exited, the measurement of both intervals stops. New intervals start upon entering the applicable condition.

7.5 Technical Normal Condition (TNC) Applicability

TNC 7.5.1 TNCs shall be met during the specified conditions in the Applicability.

TNC 7.5.2 Upon discovery of a failure to meet the TNC, the CONTINGENCY MEASURES of the associated Nonconformance shall be met.

TNC 7.5.3 When it is discovered that a TNC has not been met and the associated CONTINGENCY MEASURES are not satisfied (or an associated CONTINGENCY MEASURE is not provided), the equipment subject to the TNC is in a nonconforming condition. In this situation, appropriate actions shall be taken as necessary to provide assurance of continued safe management of irradiated fuel. In addition, the condition shall be entered into the corrective action process and assessment of reasonable assurance of safety shall be conducted. Items to be considered for this assessment include the following:

- Availability of redundant or backup equipment;
- Compensatory measures, including limited administrative controls;
- Safety function and events protected against;
- Probability of needing the safety function;
- Conservatism and margins; and
- Risk Assessment or Individual Plant Evaluation results that determine how operating the facility in the manner proposed will impact management of irradiated fuel.

TNC 7.5.4 When a TNC is not met, entry into a specified condition in the Applicability shall only be made:

a. When the associated CONTINGENCY MEASURES to be entered permit continued operation in the specified condition in the Applicability for an unlimited period of time.
b. After performance of a risk assessment addressing nonfunctional systems and components, consideration of the results, determination of the acceptability of entering the specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this TNC are stated in the individual TNC; or
c. When an allowance is stated in the individual value, parameter, or other TNC.

This TNC shall not prevent entry into specified conditions in the Applicability that are required to comply with CONTINGENCY MEASURES.

TNC 7.5.5	Equipment removed from service or declared nonfunctional to comply with CONTINGENCY MEASURES may be returned to service under administrative control solely to perform testing required to demonstrate its FUNCTIONALITY or the FUNCTIONALITY of other equipment. This is an exception to TNC 7.5.2 for the system returned to service under administrative control to perform the testing required to demonstrate FUNCTIONALITY.

7.6 Technical Verification Requirements (TVR) Applicability

TVR 7.6.1	TVRs shall be met during the specified conditions in the Applicability for individual TNCs, unless otherwise stated in the TVR. Failure to meet a TVR, whether such failure is experienced during the performance of the TVR or between performances of the TVR, shall be failure to meet the TNC. Failure to perform a TVR within the specified Frequency shall be failure to meet the TNC except as provided in TVR 7.6.3. TVRs do not have to be performed on nonfunctional equipment or variables outside specified limits.
TVR 7.6.2	Each TVR shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified TECHNICAL VERIFICATION REQUIREMENT interval.
TVR 7.6.3	When it is discovered that a TVR frequency (including the 25% extension) has not been met, the TNC must immediately be declared not met and the applicable nonconformance entered for the equipment subject to the TVR. In this situation, the condition shall be entered into the corrective action process and, if indicated, determination to evaluate the impact on plant safety shall be performed in a timely fashion and in accordance with plant procedures. Actions should be taken to restore conformance with the TNCs / TVRs in a timely fashion.

8.7 PLANT SYSTEMS

8.7.9 Fire Water System

TNC 8.7.9 The Fire Water System shall be FUNCTIONAL.

APPLICABILITY: All times.

CONTINGENCY MEASURES

----------NOTE----------
Alternate CONTINGENCY MEASURES may be applied.

NONCONFORMANCE	CONTINGENCY MEASURES	RESTORATION TIME
A. One pump NonFUNCTIONAL.	A.1 Restore the NonFUNCTIONAL pump to FUNCTIONAL status.	7 days
B. No Fire Water Systems FUNCTIONAL.	B.1 Establish a backup water system.	24 hours
C. Yard Hydrants and Hydrant Houses, with their respective hose houses equipped with hoses, combination nozzles and other auxiliary equipment, NonFUNCTIONAL.	C.1 Establish a backup water system.	1 hour
D. One or more wet standpipes, per Table 8.7.9-1, with pressure reducing valves installed, NonFUNCTIONAL.	D.1 Position a fire response cart to reach the unprotected area(s) from a FUNCTIONAL wet standpipe (or hydrant within the protected area).	1 hour

TECHNICAL VERIFICATION REQUIREMENTS

	VERIFICATION	FREQUENCY
TVR 8.7.9.1	Operate each fire pump for a minimum of 30 minutes.	31 days
TVR 8.7.9.2	Inspect each pump.	31 days
TVR 8.7.9.3	Inspect the power supply for each pump.	31 days
TVR 8.7.9.4	Verify that each valve (manual, power operated or automatic) is in the correct position.	12 months
TVR 8.7.9.5	Cycle each testable valve in the flow path through at least one complete cycle of travel.	12 months
TVR 8.7.9.6	Perform a system flush.	12 months
TVR 8.7.9.7	Perform a system FUNCTIONAL test which includes simulated automatic actuation of the system throughout its operating sequence.	18 months
TVR 8.7.9.8	Verify each pump can supply the maximum system demand of 2650 gpm at 180 ft. of head pressure.	18 months
TVR 8.7.9.9	Verify that each high-pressure pump auto-start set point is >/=100 psig.	18 months

TECHNICAL VERIFICATION REQUIREMENTS (continued)

TVR 8.7.9.10	----------NOTE---------- Applicable only to hydrants supplied from the fire protection water system. ---------- Verify, by visual inspection, adequate equipment is provided in each hose house.	12 months
TVR 8.7.9.11	----------NOTE---------- Applicable only to hydrants supplied from the fire protection water system . ---------- Verify, by visual inspection, hose house seal is in place.	31 days
TVR 8.7.9.12	Verify, by visual inspection, all required equipment is at each wet standpipe and fire response cart.	31 days
TVR 8.7.9.13	Replace all degraded gaskets and couplings for each fire response cart hose and wet standpipe nozzle.	18 months
TVR 8.7.9.14	Verify no flow blockage by partially opening each wet standpipe valve.	36 months
TVR 8.7.9.15	Perform a hose service test, at a pressure of no less than 250 psig, for the in service hoses.	12 months
TVR 8.7.9.16	Verify acceptable operation of pressure reducing valves at each wet standpipe.	12 months

TABLE 8.7.9-1
WET STANDPIPE LOCATIONS

WET STANDPIPE NUMBER	LOCATIONS
0	Screenhouse, North stairway leading to lower level
1	Adjacent to Oil Storage Room "B" and SWPT Press Filter Assembly
4	Adjacent to D/G 1B and D/G 1B Day Tank Rooms
5	Adjacent to D/G 1A and D/G 1A Day Tank Rooms
7	Air Compressor and Pump Room near Auxiliary Feedwater Area Panel
9	West of 1B Main Feedwater Pump Adjacent to S/G Blowdown Tank and 4160V Switchgear Rms
14	Adjacent to Battery Rooms 1A and 1B
21	Adjacent to Control Room, 626' Elevation near stairs
23	Adjacent to Maint. Shop, in Tank Room near Door 71
*28	Aux. Bldg. Basement North of Freight Elevator (A)
*29	Aux. Bldg. Basement North of Laundry Pumps on South Wall of Valve Gallery
*30	Aux. Bldg. Basement Solid Radwaste Handling Area, West of MCC 1-45G
*31	Aux. Bldg. Mezz. Southwest of BA Transfer Pumps
*32	Aux. Bldg. Mezz. South of S/G Blowdown Tank
33	Stairwell at 616' Elevation Next to "G" Wall
*34	Aux. Bldg. Operating Floor at "B" Feed Reg. Valve
*35	Aux. Bldg. Operating Floor West of Entrance to BA Tank Room

* Indicates the wet standpipe is supplied by Service Water

BASES

BACKGROUND

The functionality of the fire water system ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where required equipment is located. The fire water system includes the fire pumps, the fire suppression header, distribution piping, sectionalizing control and isolation valves, wet standpipes, and hydrant hose houses. The collective capability of the fire water system is adequate to minimize potential damage to required equipment and is a major element in the facility fire protection program.

In the event that the fire water system is NonFUNCTIONAL, timely corrective measures must be taken since these systems provide the major fire suppression capability of the plant. The compensatory measures specified for the suppression system are consistent with the defense-in-depth design philosophy used in the fire protection program and consider the types of fire protection equipment, anticipated (historical) frequency of fire, fire hazards, and FUNCTIONALITY of fire protection features.

The requirements for Fire Water systems and equipment FUNCTIONALITY, technical verification, and CONTINGENCY MEASURES were relocated from the KPS Fire Protection Program Plan Section 12.3.

TNC and APPLICABILITY

With Lake Michigan serving as the sole source of water for fire protection inside the protected area at KPS, The Fire Water System includes:

a. Two fire pumps, each with their discharge aligned to the fire suppression header,
b. A flow path capable of taking suction from the Circulating Water Intake and transferring water through the distribution piping via sectionalizing control or isolation valves to the yard hydrant curb valves and the front valve ahead of the water flow alarm device on each wet standpipe,
c. Yard Hydrants and Hydrant Houses with their respective hose houses equipped with hoses, combination nozzles and other auxiliary equipment,
d. Wet standpipes, per Table 8.7.9-1, with pressure reducing valves installed,
e. Fire response cart(s) for each designated building locations/areas equipped with a minimum of 100 feet of hose each plus a high-rise pouch.

To ensure the protective/mitigative features of these systems and equipment, these requirements are applicable at all times.

BASES

CONTINGENCY MEASURES

CONTINGENCY MEASURES is modified by a Note indicating that alternate CONTINGENCY MEASURES may be applied.

The CONTINGENCY MEASURES specified in this TRM section are part of the approved fire protection program and are required to be maintained in effect in accordance with the requirements of the fire protection Operating License condition.

Regulatory Issue Summary RIS 2005-07 "Compensatory Measures to Satisfy Fire Protection Program Requirements" dated April 19, 2005, and Information Notice 97-48 "Inadequate or Inappropriate Interim Fire Protection Compensatory Measures", dated July 9, 1997, recognize that the standard CONTINGENCY MEASURES of the approved fire protection program may not be the most effective compensatory measures for degraded or NonFUNCTIONAL fire protection features. Alternate CONTINGENCY MEASURES or combination of measures (e.g., additional administrative controls, operator briefings, temporary procedures, interim shutdown strategies, operator manual actions, temporary fire barriers, temporary fire detection or suppression systems) may be more effective for the specific degraded condition. Such alternate CONTINGENCY MEASURES may be applied; however, a detailed evaluation must be performed that documents the impact of the proposed alternative CONTINGENCY MEASURE and its adequacy as compared to the CONTINGENCY MEASURE required by the TRM. This evaluation must demonstrate that the alternate CONTINGENCY MEASURE would not adversely impact the effectiveness of the Fire Protection Program in preventing a radiological hazard.

The evaluation of the alternate CONTINGENCY MEASURE should incorporate risk insights regarding the location, quantity, and type of combustible materials in the fire area, the presence of ignition sources and their likelihood of occurrence; the automatic fire suppression and fire detection capability in the fire area; the manual fire suppression capability; and the human error probability, where appropriate. (OE008907)

BASES

CONTINGENCY MEASURES (continued)

D.1

An alternate CONTINGENCY MEASURE has been evaluated as acceptable for wet standpipes 28, 30 and 35 which includes the use of HS-33 and 100' of 1-1/2" fire hose with nozzle staged at HS-33. (Ref. 1)

An alternate CONTINGENCY MEASURE has been evaluated as acceptable for wet standpipes 29 and 31 which includes the use of HS-33, with no additional staged equipment required. (Ref. 1)

An alternate CONTINGENCY MEASURE has been evaluated as acceptable for wet standpipe 32 which includes the use of HS-15 or HS-23, with no additional staged equipment required. (Ref. 1)

An alternate CONTINGENCY MEASURE has been evaluated as acceptable for wet standpipe 34 which includes the use of HS-21 or HS-33, with no additional staged equipment required. (Ref. 1)

TECHNICAL VERIFICATION REQUIREMENTS

These verification requirements confirm the FUNCTIONAL status of the Fire Water systems and equipment.

TVR 8.7.9.10 and 8.7.9.11

These are modified by a Note indicating that the TVRs are applicable only to hydrants supplied from the fire protection water system. This was in response to CR382767, and identified during a Fire Protection audit. This was intended to clarify which hose houses were within the scope of the Fire Protection Program Plan (FPPP), and thus within the intended scope of these TVRs.

REFERENCES

1. Kewaunee Power Station Fire Protection Program Plan, Rev. 12, September 2013
2. CR382767
3. Fire Protection Engineering Evaluation (FPEE) 070, Rev. 0.

8.7 PLANT SYSTEMS

8.7.10 Fire Detection System

TNC 8.7.10 The Fire Detection System for each Location shall have at least the minimum required number of fire detection instruments in Table 8.7.10-1 FUNCTIONAL.

APPLICABILITY: All times.

CONTINGENCY MEASURES

----------NOTES----------

1. Separate NONCONFORMANCE entry is allowed for each Location in Table 8.7.10-1.

2. Alternate CONTINGENCY MEASURES may be applied.

NONCONFORMANCE	CONTINGENCY MEASURES	RESTORATION TIME
A. Less than the minimum required fire detection instruments in any Location FUNCTIONAL when equipment in the Location being monitored is required to be OPERABLE/ FUNCTIONAL.	A.1 Perform a fire watch patrol. AND A.2 Restore the fire detection instruments to at least the minimum required for that Location.	Once per hour 14 days
B. Less than the minimum required fire detection instruments in any Location FUNCTIONAL when equipment in the Location being monitored is NOT required to be OPERABLE/ FUNCTIONAL.	B.1 Perform a fire watch patrol. AND B.2 Restore the fire detection instruments to at least the minimum required for that Location.	1 hour AND Once per 4 hours thereafter 14 days

CONTINGENCY MEASURES (continued)

NONCONFORMANCE	CONTINGENCY MEASURES	RESTORATION TIME
C. CONTINGENCY MEASURES and associated RESTORATION TIME not met.	C.1 Initiate action to restore the equipment to FUNCTIONAL status.	Immediately

TECHNICAL VERIFICATION REQUIREMENTS

----------NOTE----------
Table 8.7.10-1 includes both fire detection instruments and fusible link type detectors.

	VERIFICATION	FREQUENCY
TVR 8.7.10.1	Perform CHANNEL FUNCTIONAL TEST of at least the minimum required number of fire detection instruments in Table 8.7.10-1.	6 months
TVR 8.7.10.2	Verify intact and FUNCTIONAL, by visual inspection, at least the minimum required number of fusible link type detectors in Table 8.7.10-1.	6 months

TABLE 8.7.10-1
FIRE DETECTOR FUNCTIONALITY REQUIREMENTS

LOCATIONS	FIRE ZONE	DETECTOR ZONE	NUMBER OF DETECTORS	MINIMUM REQUIRED
Bus 1-1 & 1-2 Room	AX 21	0304	3	3
Aux Bldg Fan Floor 642'	AX 23A	0804	3	3
Fan Floor 657'	AX 23A	0803	6	5
Auxiliary Bldg. Bsmt 586'	AX 23A	1304	9	8
Auxiliary Bldg 606'	AX 23B	0102	7	6
Auxiliary Bldg 586'	AX 23B	0902	18	16
Aux Bldg 1B RHR Pump Pit	AX 23C	1401	1	1
1B Component Cooling Pump	AX 23D	1402	1	1
Radwaste Drumming Area	AX 24	0903	3	3
Relay Room	AX 30	0301	21	17
Cable Run "A" Cable Spreading Rm	AX 32	0102	4	3
Cable Run "B" Cable Spreading Rm	AX 32	0202	12	10
Control Room	AX 35	0301	10	8
Control Room A/C Eq. Room (Vent Duct)	AX 35	0804	1	1
Annulus Area (Elect. Pene. "A")	SB-65	0103	3	3
Annulus Area (Elect. Pene. "B")	SB-65	0203	3	3
Screenhouse	SC 70A	1101	6	5
Screenhouse	SC 70B	1301	2	2
1A Emerg. Diesel	TU-90	0104	6	5
1A Emerg. Diesel Day Tank	TU-91	0104	1	1
1B Emerg. Diesel	TU-92	0204	6	5
1B Emerg. Diesel Day Tank	TU-93	0204	1	1
Cardox Room	TU-94	0204	2	2
Dedicated Shutdown Panel Room	TU-95A	1302	5	4
Safeguards Alley	TU-95B	0302	9	7
1A AFW Pump Room	TU-95C	1303	1	1
1A Battery Room	TU-97	0601	1	1
1B Battery Room	TU-98	0601	1	1
Fuel Handling Room 606'	AX-24	0904	1	1
Fuel Handling Room 633'	AX-24	0901	3	3
Service Room 606' (Working Material Storage Room)	AX-32	1203	7	7
Service Room 626' (Work Planning Area)	AX-32	1002	3	3
Service Room 606' (RPO Office)	AX-32	1003	3	3
Former Records Storage Room 642'	AX-40	602	2	2
TSC Non-Safeguard Battery & Electrical Eqpt Rm	TC-102	1202	3	3
TSC Basement Computer Room 586'	TC-100	1202	9	7

BASES

BACKGROUND

FUNCTIONAL fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages, thus reducing the potential for damage to equipment. This detection capability is one element in the KPS fire protection program's "defense in depth" approach.

The requirements for Fire Detection System FUNCTIONALITY, technical verification, and CONTINGENCY MEASURES were relocated from the KPS Fire Protection Program Plan Section 12.2.

TNC and APPLICABILITY

The Fire Detection System for each Location shall have the minimum required number of fire detection instruments (>/=75%) FUNCTIONAL at all times.

The TNC is modified by NOTE 1 allowing separate NONCONFORMANCE entry for each Location in Table 8.7.10-1. This is intended to clarify the application and tracking of CONTINGENCY ACTIONS and RESTORATION TIMES.

CONTINGENCY MEASURES

CONTINGENCY MEASURES is modified by Note 2 indicating that alternate CONTINGENCY MEASURES may be applied.

The CONTINGENCY MEASURES specified in this TRM section are part of the approved fire protection program and are required to be maintained in effect in accordance with the requirements of the fire protection Operating License condition.

Regulatory Issue Summary RIS 2005-07 "Compensatory Measures to Satisfy Fire Protection Program Requirements" dated April 19, 2005, and Information Notice 97-48 "Inadequate or Inappropriate Interim Fire Protection Compensatory Measures", dated July 9, 1997, recognize that the standard CONTINGENCY MEASURES of the approved fire protection program may not be the most effective compensatory measures for degraded or NonFUNCTIONAL fire protection features. Alternate CONTINGENCY MEASURES or combination of measures (e.g., additional administrative controls, operator briefings, temporary procedures, interim shutdown strategies, operator manual actions, temporary fire barriers, temporary fire detection or suppression systems) may be more effective for the specific degraded condition. Such alternate CONTINGENCY MEASURES may be applied; however, a detailed evaluation must be performed that documents the impact of the proposed alternative CONTINGENCY MEASURE and its adequacy

BASES

CONTINGENCY MEASURE (continued)

as compared to the CONTINGENCY MEASURE required by the TRM. This evaluation must demonstrate that the alternate CONTINGENCY MEASURE would not adversely impact the effectiveness of the Fire Protection Program in preventing a radiological hazard.

The evaluation of the alternate CONTINGENCY MEASURE should incorporate risk insights regarding the location, quantity, and type of combustible materials in the fire area, the presence of ignition sources and their likelihood of occurrence; the automatic fire suppression and fire detection capability in the fire area; the manual fire suppression capability; and the human error probability, where appropriate. (OE008907)

A.1, A.2, B.1 and B.2

In the event that a portion of the fire detection instrumentation is NonFUNCTIONAL, the establishment of a fire watch patrol in the affected Location(s) provides detection capability until the NonFUNCTIONAL instrumentation is restored to FUNCTIONAL status.

C.1

This CONTINGENCY MEASURE is intended to initiate action in accordance with the station corrective action process outlining the actions taken, the cause of the NonFUNCTIONALITY, and the plans and schedule for restoring the equipment to FUNCTIONAL status.

TECHNICAL VERIFICATION REQUIREMENTS

TVR 8.7.10.1

TVR 8.7.10.1 requires the performance of a CHANNEL FUNCTIONAL TEST of at least the minimum required number of fire detection instruments in Table 8.7.10-1 every 6 months.

TVR 8.7.10.2

TVR 8.7.10.2 requires that at least the minimum required number of fusible link type detectors in Table 8.7.10-1 be verified intact and FUNCTIONAL, by visual inspection, every 6 months.

BASES

REFERENCES

1. Kewaunee Power Station Fire Protection Program Plan, Rev. 12, September 2013
2. Fire Protection Engineering Evaluation (FPEE) No. 070
3. NRC Regulatory Issue Summary 2005-07: Compensatory Measures To Satisfy The Fire Protection Requirements
4. NRC Information Notice 97-48: Inadequate or Inappropriate Interim Fire Protection Compensatory Measures

8.7 PLANT SYSTEMS

8.7.11 Low Pressure CO2 Suppression Systems

TNC 8.7.11 The following Low Pressure CO2 Suppression Systems shall be FUNCTIONAL:

a. Diesel Generator 1A (TU-90) and Day Tank Room (TU-91),

b. Diesel Generator 1B (TU-92) and Day Tank Room (TU-93),

APPLICABILITY: All times.

CONTINGENCY MEASURES

----------NOTES----------

1. Separate NONCONFORMANCE entry is allowed for each CO2 Suppression System.

2. Alternate CONTINGENCY MEASURES may be applied.

NONCONFORMANCE	CONTINGENCY MEASURES	RESTORATION TIME
A. One or more required Low Pressure CO2 Suppression System NonFUNCTIONAL.	A.1 Establish backup fire suppression equipment for the unprotected area(s). AND	1 hour
	A.2 Restore the NonFUNCTIONAL system(s) to FUNCTIONAL status.	14 days

TECHNICAL VERIFICATION REQUIREMENTS

	VERIFICATION	FREQUENCY
TVR 8.7.11.1	Verify CO2 storage tank level ≥ 60%.	7 days
TVR 8.7.11.2	Verify CO2 storage tank pressure ≥ 275 psig.	7 days
TVR 8.7.11.3	Verify that system valves and associated ventilation dampers actuate manually and automatically upon receipt of a simulated actuation signal.	18 months
TVR 8.7.11.4	Verify flow from each nozzle during a "Puff Test".	18 months

BASES

BACKGROUND

The functionality of the Low Pressure CO2 Systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in select portions of the facility. The collective capability of the Low Pressure CO2 Systems is adequate to minimize potential damage to required equipment and is a major element in the facility fire protection program.

In the event that a Low Pressure CO2 System for one or more of the subject areas is NonFUNCTIONAL, timely corrective measures must be taken since these systems provide major fire suppression capability for the plant. The compensatory measures specified are consistent with the defense-in-depth design philosophy used in the fire protection program and consider the types of fire protection equipment, anticipated (historical) frequency of fire, fire hazards, and FUNCTIONALITY of fire protection features.

The requirements for Low Pressure CO2 Systems and equipment FUNCTIONALITY, technical verification, and CONTINGENCY MEASURES were relocated from the KPS Fire Protection Program Plan Section 12.5.

CONTINGENCY MEASURES

CONTINGENCY MEASURES is modified by a Note indicating that alternate CONTINGENCY MEASURES may be applied.

The CONTINGENCY MEASURES specified in this TRM section are part of the approved fire protection program and are required to be maintained in effect in accordance with the requirements of the fire protection Operating License condition.

Regulatory Issue Summary RIS 2005-07 "Compensatory Measures to Satisfy Fire Protection Program Requirements" dated April 19, 2005, and Information Notice 97-48 "Inadequate or Inappropriate Interim Fire Protection Compensatory Measures", dated July 9, 1997, recognize that the standard CONTINGENCY MEASURES of the approved fire protection program may not be the most effective compensatory measures for degraded or NonFUNCTIONAL fire protection features. Alternate CONTINGENCY MEASURES or combination of measures (e.g., additional administrative controls, operator briefings, temporary procedures, interim shutdown strategies, operator manual actions, temporary fire barriers, temporary fire detection or suppression systems) may be more effective for the specific degraded condition.

BASES

CONTINGENCY MEASURES (continued)

Such alternate CONTINGENCY MEASURES may be applied; however, a detailed evaluation must be performed that documents the impact of the proposed alternative CONTINGENCY MEASURE and its adequacy as compared to the CONTINGENCY MEASURE required by the TRM. This evaluation must demonstrate that the alternate CONTINGENCY MEASURE would not adversely impact the effectiveness of the Fire Protection Program in preventing a radiological hazard.

The evaluation of the alternate CONTINGENCY MEASURE should incorporate risk insights regarding the location, quantity, and type of combustible materials in the fire area, the presence of ignition sources and their likelihood of occurrence; the automatic fire suppression and fire detection capability in the fire area; the manual fire suppression capability; and the human error probability, where appropriate. (OE008907)

TECHNICAL VERIFICATION REQUIREMENTS

These verification requirements confirm the FUNCTIONAL status of the Fire Protection-related ventilation systems and equipment.

REFERENCES

1. Kewaunee Power Station Fire Protection Program Plan, Rev. 12, September 2013
2. CAP028113

8.7 PLANT SYSTEMS

8.7.12 Ventilation Systems (Fire Protection)

TNC 8.7.12 The following Ventilation Systems shall be FUNCTIONAL:

a. The Control Room ventilation automatic isolation,
b. Battery Room 1A ventilation, and
c. Battery Room 1B ventilation.

APPLICABILITY: All times.

CONTINGENCY MEASURES

----------NOTE----------
Alternate CONTINGENCY MEASURES may be applied.

NONCONFORMANCE	CONTINGENCY MEASURES	RESTORATION TIME
A. Control Room ventilation automatic isolation NonFUNCTIONAL.	A.1 ----------NOTE---------- Only applicable if the NonFUNCTIONALITY is not intentionally developed. ---------- Initiate action to restore the equipment to FUNCTIONAL status.	Immediately

CONTINGENCY MEASURES (continued)

NONCONFORMANCE	CONTINGENCY MEASURES	RESTORATION TIME
B. Battery Room 1A ventilation NonFUNCTIONAL. OR Battery Room 1A ventilation low air flow monitor NonFUNCTIONAL. OR Battery Room 1B ventilation NonFUNCTIONAL. OR Battery Room 1B ventilation low air flow monitor NonFUNCTIONAL.	B.1 Establish backup ventilation.	1 hour

TECHNICAL VERIFICATION REQUIREMENTS

	VERIFICATION	FREQUENCY
TVR 8.7.12.1	Verify that Control Room ventilation automatic isolation system dampers actuate manually and automatically upon receipt of a simulated actuation signal (via smoke detection in the exhaust duct).	18 months
TVR 8.7.12.2	Verify Control Room alarm/annunciation upon receipt of a simulated loss of Battery Room 1A ventilation airflow signal.	18 months
TVR 8.7.12.3	Verify Control Room alarm/annunciation upon receipt of a simulated loss of Battery Room 1B ventilation airflow signal.	18 months

BASES

BACKGROUND

The requirements for Fire Protection-related ventilation systems and equipment FUNCTIONALITY, technical verification, and CONTINGENCY MEASURES were relocated from the KPS Fire Protection Program Plan Section 12.6.

TNC and APPLICABILITY

To ensure the protective/mitigative features of these systems and equipment, these requirements are applicable at all times.

The Control Room ventilation automatic isolation is initiated via smoke detection installed in the exhaust duct. A valid initiation of Control Room ventilation isolation requires that Control Room ventilation be in service to ensure transport of combustion products to the in-duct smoke detection instrumentation.

Battery Room 1A and 1B ventilation systems includes low air flow monitors that alarm in the Control Room to indicate the potential loss of Battery Room ventilation.

CONTINGENCY MEASURES

CONTINGENCY MEASURES is modified by a Note indicating that alternate CONTINGENCY MEASURES may be applied.

The CONTINGENCY MEASURES specified in this TRM section are part of the approved fire protection program and are required to be maintained in effect in accordance with the requirements of the fire protection Operating License condition.

Regulatory Issue Summary RIS 2005-07 "Compensatory Measures to Satisfy Fire Protection Program Requirements" dated April 19, 2005, and Information Notice 97-48 "Inadequate or Inappropriate Interim Fire Protection Compensatory Measures", dated July 9, 1997, recognize that the standard CONTINGENCY MEASURES of the approved fire protection program may not be the most effective compensatory measures for degraded or NonFUNCTIONAL fire protection features. Alternate CONTINGENCY MEASURES or combination of measures (e.g., additional administrative controls, operator briefings, temporary procedures, interim shutdown strategies, operator manual actions, temporary fire barriers, temporary fire detection or suppression systems) may be more effective for the specific degraded condition. Such alternate CONTINGENCY MEASURES may be applied; however, a detailed evaluation must be performed that documents the impact of the proposed alternative CONTINGENCY MEASURE and its adequacy as compared to the CONTINGENCY MEASURE required by the TRM.

BASES

CONTINGENCY MEASURES (continued)

This evaluation must demonstrate that the alternate CONTINGENCY MEASURE would not adversely impact the effectiveness of the Fire Protection Program in preventing a radiological hazard.

The evaluation of the alternate CONTINGENCY MEASURE should incorporate risk insights regarding the location, quantity, and type of combustible materials in the fire area, the presence of ignition sources and their likelihood of occurrence; the automatic fire suppression and fire detection capability in the fire area; the manual fire suppression capability; and the human error probability, where appropriate. (OE008907)

There is no CONTINGENCY MEASURE, other than A.1, when the Control Room ventilation automatic isolation is NonFUNCTIONAL because no immediate equipment restoration action is required.

A.1

This CONTINGENCY MEASURE is intended to initiate action in accordance with the station corrective action process outlining the actions taken, the cause of the NonFUNCTIONALITY, and the plans and schedule for restoring the equipment to FUNCTIONAL status.

TECHNICAL VERIFICATION REQUIREMENTS

These verification requirements confirm the FUNCTIONAL status of the Fire Protection-related ventilation systems and equipment.

REFERENCES

1. Kewaunee Power Station Fire Protection Program Plan, Rev. 12, September 2013

TECHNICAL VERIFICATION REQUIREMENTS

	VERIFICATION	FREQUENCY
TVR 8.8.1.1	Verify TSC DG is synchronized and loaded and operates for ≥ 60 minutes at a load ≥ 500 kW.	92 days
TVR 8.8.1.2	Verify TSC DG fuel oil storage tank contains ≥ 200 gallons of usable fuel.	31 days
TVR 8.8.1.3	Verify TSC DG lube oil level is ≥ 1 inch below "F" mark on engine oil dipstick when engine has been shutdown > 20 minutes.	31 days
TVR 8.8.1.4	Verify fuel oil properties for water, sediment, and particulates in the TSC DG day tank are tested and maintained within limits.	92 days
TVR 8.8.1.5	Verify TSC DG starts from standby condition in ≤ 40 seconds and achieves required voltage and frequency.	18 months
TVR 8.8.1.6	Verify TSC DG auto start and load circuitry is FUNCTIONAL.	36 months
TVR 8.8.1.7	----------NOTE---------- Replacing the battery meets this TVR. ---------- Verify required starting battery capacity.	36 months

8.8 ELECTRICAL SYSTEMS

8.8.1 Technical Support Center (TSC) Diesel Generator (DG)

TNC 8.8.1 TSC DG shall be FUNCTIONAL with:

a. Usable fuel oil supply ≥ 200 gallons;

b. Lube oil supply within limits; and,

c. Starting battery FUNCTIONAL.

APPLICABILITY: At all times.

CONTINGENCY MEASURES

----------NOTE----------
Changes may be made in plant conditions with the TSC DG NonFUNCTIONAL.

NONCONFORMANCE	CONTINGENCY MEASURES		RESTORATION TIME
A. TSC DG NonFUNCTIONAL.	A.1	Initiate action to restore to FUNCTIONAL status.	Immediately
	AND		
	A.2	Protect Bus 1-46.	Immediately
	AND		
	A.3	Notify Security that automatic backup power to protected area lighting is unavailable.	Immediately

BASES

BACKGROUND

The TSC DG is an independent, non-class 1E, 600 kW (1000 hr/year standby rating) power source that provides AC power to 480V Bus 1-46 through breaker 14604.

The TSC DG starts automatically on loss of voltage to Bus 1-46 and automatically connects to the bus after attaining voltage and frequency provided that Source Breaker 14601 has tripped.

The TSC DG provides power to the TSC Building, security lighting system, and other non-ESF plant systems which are required to operate upon loss of off-site electrical sources. Auxiliaries for fuel supply, engine radiator heat rejection, and ventilation are energized from bus 1-46.

TNC and APPLICABILITY

The TSC DG is required to be FUNCTIONAL at all times, to provide backup AC power to Security equipment.

The TSC DG is FUNCTIONAL when it is capable of meeting its supply requirements. It must be capable of automatically starting and available to power required loads after loss of power to Bus 1-46.

The 10,000 gallon capacity fuel oil storage tank for the TSC DG is maintained with sufficient fuel oil to allow operation for an extended period, within which normal power can reasonably be expected to be restored. A minimum indicated level of 2000 gallons is procedurally required to maintain defense in depth beyond the minimum needed for extended operation and thereby assures that the required 200 gallons of usable fuel is available. The 200 gallon requirement originated when the TSC Diesel Generator was previously credited as the Station Blackout Alternate AC Source

To be FUNCTIONAL, the lube oil supply must be within established quality and quantity limits. Required oil quantity is determined using the engine oil dipstick, which can only be used when the engine is shutdown. Oil level must be $\geq$ 1 inch below "F" mark on dipstick (i.e., 1 inch below "F" mark is the lowest allowable oil level) when engine has been shutdown > 20 minutes. When the engine is running, proper oil levels are monitored on the oil level sight glass. Oil quality is maintained via normal station processes for lube oil procurement.

The starting battery must be maintained in a high state of readiness to ensure it remains capable of starting the TSC DG in $\leq$ 40 seconds of a start signal. The battery is connected to a battery charger that maintains it continuously charged.

BASES

CONTINGENCY MEASURES

A.1

If the TSC DG is NonFUNCTIONAL, action must immediately be initiated to restore it to FUNCTIONAL status. While it is being restored, the following additional compensatory actions (A.2 thru A.3) are needed to ensure availability of electrical power and the capability to respond to a loss of power event.

A.2

With the TSC DG NonFUNCTIONAL, the backup power supply to Bus 1-46 is degraded. Except for emergent circumstances, work and testing relative to Bus 46 should not be undertaken.

A.3

With the TSC DG NonFUNCTIONAL, the automatic backup power supply to Protected Area Lighting from this source is unavailable.

TECHNICAL VERIFICATION REQUIREMENTS

TVR 8.8.1.1

Verifying that the TSC DG is synchronized with its bus, loaded, and operates for ≥ 60 minutes at a load ≥ 500 kW ensures the availability of the TSC DG as a backup power source for the TSC. The 92 day frequency is consistent with NUMARC 87-00 guidance.

TVR 8.8.1.2

Required usable fuel oil quantity is verified by checking indicated level on the TSC DG fuel oil storage tank. The 200 gallon limit was based on the fuel needed for operation at the SBO load output for the 4 hour coping duration. However, a minimum indicated level of 2000 gallons is procedurally required to maintain defense in depth and assures that the required 200 gallons of usable fuel is available. This TVR is satisfied if indicated level is ≥ 2000 gallons or if 200 usable gallons is otherwise determined. The 31 day frequency is adequate to ensure that a sufficient supply of usable fuel oil is available, since unit operators would be aware of any large uses of fuel oil during this period.

BASES

TECHNICAL VERIFICATION REQUIREMENTS (continued)

TVR 8.8.1.5

Diesel Generator Start Timing was required by NUMARC 87-00 (Paragraph B.10) when the TSC Diesel Generator was previously credited as the Station Blackout Alternate AC Source. Verifying the TSC DG starts from standby condition in ≤ 40 seconds and achieves required voltage and frequency is being maintained as a good practice. Although normally performed with each start, the 18 month frequency is consistent with the periodicity specified in NUMARC 87-00.

TVR 8.8.1.6

This TVR ensures that the auto start and load circuitry is capable of supporting the TSC DG function to provide automatic emergency power to Security equipment. This verification is only performed on the associated circuitry components (auto loading of the DG onto the bus is not required to be performed as part of the test).

TVR 8.8.1.7

Every 36 months, the starting battery must be either replaced with a new battery or tested to verify that it maintains required capacity needed to start the TSC DG in ≤ 40 seconds. Battery replacement is typically performed rather than capacity testing based on economics (i.e., cost). The 36 month frequency is based on the vendor's recommendation contained in a letter from the engine manufacturer, Western Engine (Reference 3).

REFERENCES

1. NUMARC 87-00 (Rev 0), Appendix B, Alternate AC Power Criteria.
2. KPS Renewed Facility Operating License, § 2.C(15)(b), NUREG-1958, "Safety Evaluation Report Related to the Kewaunee Power Station," Appendix A, dated January 2011, License Renewal Commitment 30.
3. Commitment 95-090, Periodic Capacity Testing of the TSC Diesel Starting Batteries per Letter from Western Engine dated July 26, 1988.
4. NUREG-0737 Clarification of TMI Action Plan Requirements.
5. Calculation C11450 Auxiliary Power System Modeling and Analysis Rev. 2.

8.8 ELECTRICAL SYSTEMS

8.8.2 AC Sources

TNC 8.8.2 One circuit between the offsite transmission network and the onsite AC electrical power distribution subsystem(s) required by TRM 8.8.5. Distribution Systems shall be FUNCTIONAL.

APPLICABILITY: Whenever any irradiated fuel assembly is stored in the spent fuel pool and during movement of irradiated fuel assemblies.

CONTINGENCY MEASURES

NONCONFORMANCE	CONTINGENCY MEASURES		RESTORATION TIME
A. TNC 8.8.2 not met.	A.1	Suspend movement of irradiated fuel assemblies.	Immediately
	AND		
	A.2	Initiate action to restore required offsite power circuit to FUNCTIONAL status.	Immediately

TECHNICAL VERIFICATION REQUIREMENTS

	VERIFICATION	FREQUENCY
TVR 8.8.2.1	Verify correct breaker alignment and indicated power availability for the offsite circuit.	7 days

BASES

BACKGROUND

Onsite electrical power is normally supplied from the offsite transmission network by one of two separate sources. The preferred source is the Tertiary Auxiliary Transformer. The Reserve Auxiliary Transformer is also available if necessary. Either of these sources is sufficient to supply the necessary electrical load from one of four available transmission lines.

Because of the continued need for electric power to supply equipment needed for cooling of irradiated fuel stored in the spent fuel pool and as defense in depth for ensuring normal electrical power availability during a response to a Fuel Handling Accident (FHA), the pertinent requirements of TS 3.8.2 "AC Sources Shutdown" for a single FUNCTIONAL AC circuit were relocated to the TRM.

TNC and APPLICABILITY

Offsite power is supplied to the unit substation from the transmission network by four transmission lines. These four transmission lines support FUNCTIONALITY of the required qualified circuit between the offsite transmission network and the onsite electrical power system.

To be FUNCTIONAL, the AC circuit must be must be properly aligned (i.e. required breakers closed) such that off-site transmission grid is connected to and able to supply Bus 5 or Bus 6 as required.

The requirement for an AC circuit was relocated from the previous TS 3.8.2. It is required to be FUNCTIONAL whenever irradiated fuel is stored in the spent fuel pool and also during the movement of irradiated fuel assemblies.

CONTINGENCY MEASURES

A.1 and A.2

If neither of the circuits are FUNCTIONAL (i.e., TNC 8.8.2 is not met), reliability of the normal power supply to equipment needed for cooling of irradiated fuel stored in the spent fuel pool and defense in depth for mitigation of a fuel handling accident is degraded. Therefore, CONTINGENCY MEASURE A.1 requires immediate action to suspend the movement of irradiated fuel in the spent fuel pool and CONTINGENCY MEASURE A.2 requires initiating action to restore an offsite power supply to FUNCTIONAL.

BASES

TECHNICAL VERIFICATION REQUIREMENTS

TVR 8.8.2.1

This TVR ensures proper circuit continuity for the offsite AC electrical power supply to the onsite distribution network and availability of offsite AC electrical power. The breaker alignment verifies that each breaker is in its correct position to ensure that distribution buses and loads are connected to their preferred power source. The 7 day Frequency is adequate since breaker position is not likely to change without the operator being aware of it and because its status is displayed in the control room.

REFERENCES

1. USAR 8.1.1.2.1.
2. USAR Figure 8.2-1 and 8.2-2.
3. Deleted.
4. NRC Safety Evaluation Related to License Amendment 67, dated July 3, 1986.
5. Deleted.
6. License Amendment 212, issued by NRC June 9, 2014.

8.8 ELECTRICAL SYSTEMS

8.8.2 AC Sources

TNC 8.8.2 One circuit between the offsite transmission network and the onsite AC electrical power distribution subsystem(s) required by TRM 8.8.5. Distribution Systems shall be FUNCTIONAL.

APPLICABILITY: Whenever any irradiated fuel assembly is stored in the spent fuel pool and during movement of irradiated fuel assemblies.

CONTINGENCY MEASURES

NONCONFORMANCE	CONTINGENCY MEASURES	RESTORATION TIME
A. TNC 8.8.2 not met.	A.1 Suspend movement of irradiated fuel assemblies.	Immediately
	AND	
	A.2.1 Initiate action to restore required offsite power circuit to FUNCTIONAL status.	Immediately
	OR	
	A.2.2.1 Verify alternate cooling capability available.	Immediately
	AND	
	A.2.2.2 Initiate action to restore required offsite power circuit to FUNCTIONAL status.	Prior to spent fuel pool temperature exceeding 100°F.

TECHNICAL VERIFICATION REQUIREMENTS

	VERIFICATION	FREQUENCY
TVR 8.8.2.1	Verify correct breaker alignment and indicated power availability for the offsite circuit.	7 days

BASES

BACKGROUND

Onsite electrical power is normally supplied from the offsite transmission network by one of two separate sources. The preferred source is the Tertiary Auxiliary Transformer. The Reserve Auxiliary Transformer is also available if necessary. Either of these sources is sufficient to supply the necessary electrical load from one of four available transmission lines.

Because of the continued need for electric power to supply equipment needed for cooling of irradiated fuel stored in the spent fuel pool and as defense in depth for ensuring normal electrical power availability during a response to a Fuel Handling Accident (FHA), the pertinent requirements of TS 3.8.2 "AC Sources Shutdown" for a single FUNCTIONAL AC circuit were relocated to the TRM.

TNC and APPLICABILITY

Offsite power is supplied to the unit substation from the transmission network by four transmission lines. These four transmission lines support FUNCTIONALITY of the required qualified circuit between the offsite transmission network and the onsite electrical power system.

To be FUNCTIONAL, the AC circuit must be must be properly aligned (i.e. required breakers closed) such that off-site transmission grid is connected to and able to supply Bus 5 or Bus 6 as required.

The requirement for an AC circuit was relocated from the previous TS 3.8.2. It is required to be FUNCTIONAL whenever irradiated fuel is stored in the spent fuel pool and also during the movement of irradiated fuel assemblies.

CONTINGENCY MEASURES

A.1 and A.2

If neither of the circuits are FUNCTIONAL (i.e., TNC 8.8.2 is not met), reliability of the normal power supply to equipment needed for cooling of irradiated fuel stored in the spent fuel pool and defense in depth for mitigation of a fuel handling accident is degraded. Therefore, CONTINGENCY MEASURE A.1 requires immediate action to suspend the movement of irradiated fuel in the spent fuel pool and CONTINGENCY MEASURE A.2.1 requires initiating action to restore an offsite power supply to FUNCTIONAL.

CONTINGENCY MEASURE A.2.2 provides flexibility for conditions such as a need to temporarily remove offsite electrical circuits from service (e.g., maintenance) where spent fuel pool temperature is

BASES

CONTINGENCY MEASURES (continued)

sufficiently low. As discussed in the Bases for TRM 8.7.8, "Spent Fuel Pool (SFP) Temperature", the SFP has a large capacity for heat absorption and alternate cooling capability can be readily made available. Therefore, in lieu of performing CONTINGENCY MEASURE A.2.1, operators may instead verify that alternate cooling capability (such as SFP makeup water capability that does not rely on offsite power) and delay initiating action to restore the required offsite power circuit, until shortly before SFP bulk water temperature rises to 100°F. This is below the SFP design temperature of 150°F.

TECHNICAL VERIFICATION REQUIREMENTS

TVR 8.8.2.1

This TVR ensures proper circuit continuity for the offsite AC electrical power supply to the onsite distribution network and availability of offsite AC electrical power. The breaker alignment verifies that each breaker is in its correct position to ensure that distribution buses and loads are connected to their preferred power source. The 7 day Frequency is adequate since breaker position is not likely to change without the operator being aware of it and because its status is displayed in the control room.

REFERENCES

1. USAR 8.1.1.2.1.
2. USAR Figure 8.2-1 and 8.2-2.
3. Deleted.
4. NRC Safety Evaluation Related to License Amendment 67, dated July 3, 1986.
5. Deleted.
6. License Amendment 212, issued by NRC June 9, 2014.

8.8 ELECTRICAL SYSTEMS

8.8.3 Emergency Diesel Generator (EDG) Ventilation Damper Control Air Supply

TNC 8.8.3 EDG ventilation damper control air supply shall be FUNCTIONAL with the following provisions:

a. Two compressed air cylinders aligned to the damper controllers;

b. Pressure in each required air cylinder and air leakage downstream of isolation check valve shall be maintained within limits specified in Figure 8.8.3-1.

APPLICABILITY: Whenever the associated EDG is required to be OPERABLE.

CONTINGENCY MEASURES

NONCONFORMANCE	CONTINGENCY MEASURES		RESTORATION TIME
A. Ventilation damper control air supply on EDG NonFUNCTIONAL for reasons other than Nonconformance B or C.	A.1	Evaluate OPERABILITY of affected EDG per Technical Specification 3.8.2.	Immediately
B. Requirements of TNC 8.8.3.b not met on E	B.1	Restore parameter(s) to within limits.	24 hours
	AND		
	B.2	Evaluate OPERABILITY of affected EDG per Technical Specification 3.8.2.	Immediately

Deleted

8.9 FUEL HANDLING OPERATIONS

8.9.1 Spent Fuel Pool – Control of Heavy Loads

TNC 8.9.1 Heavy loads greater than the weight of a fuel assembly, including its heaviest insert and handling tool, will not be transported over or placed in either spent fuel pool when spent fuel is stored in that pool, unless:

a. The heavy load does not traverse directly above spent fuel stored in the pool's spent fuel storage racks, and

b. The load handling system (e.g., crane, associated lifting devices, and interfacing lift points) used for these lifts meets the single-failure-proof handling system criteria.

---NOTE---
When moving any load over storage racks containing fuel (regardless of weight), refer to TS 5.2.2.e for additional requirements.

APPLICABILITY: Whenever a load is lifted in or around the spent fuel pool.

CONTINGENCY MEASURES

NONCONFORMANCE	CONTINGENCY MEASURES		RESTORATION TIME
A. TNC 8.9.1 not met.	A.1	Place load in a safe condition no longer suspended over the spent fuel pool.	Immediately
	AND		
	A.2	Cease further movement in or over the spent fuel pool.	Immediately
	AND		
	A.3	Initiate actions to restore compliance to TNC 8.9.1.	Immediately

BASES

BACKGROUND

This administrative limiting condition for operations was relocated from the Kewaunee Power Station Technical Specifications because it no longer meets any of the four criteria 10 CFR 50.36 lists for items required in technical specifications (Reference 1).

The Auxiliary Building (AB) crane (part of the load handling system[1]) was modified to meet the criteria of a single-failure-proof crane found in NUREG-0612, Section 5.1.6(2) and the crane is designed, fabricated, installed, and tested to the guidance of NUREG-0554, as approved for KPS (Reference 1). The crane will be inspected, tested, and maintained in accordance with ASME B30.2-1976. In addition, the modified Auxiliary Building crane was load-tested to 156.25 tons (125%). The lifting devices and interfacing lift points associated with the Auxiliary Building crane also meet the guidance in NUREG-0612 to be considered a single-failure-proof lifting system. Specifically, special lifting devices will meet the guidance in NUREG-0612, Section 5.1.6(1)(a) and lifting devices not specifically designed will meet the guidance in NUREG-0612, Section 5.1.6(1)(b). Interfacing lift points will meet the guidance in NUREG-0612, Section 5.1.6(3). A single-failure-proof AB crane lifting system allows for the removal of the cask-drop accident from the licensing basis of the Kewaunee Power Station, as the accident is no longer credible.

With the cask-drop accident removed from the licensing basis, Criterion 2 of 10 CFR 50.36 no longer applied, and the crane load limits were relocated from the TS to the TRM.

Crane interlocks are utilized to ensure safe load handling. Crane interlocks and administrative procedures will prevent the movement of heavy loads over spent fuel in the storage racks in spent fuel pool. Movement of necessary heavy loads over irradiated fuel in the spent fuel canister during cask handling operations will only be performed as required by the design of the spent fuel cask system. Removal / placement of additional spent fuel racks and support hardware will be controlled by procedures to prevent movement to directly above spent fuel. Handling of spent fuel storage casks and associated other heavy loads is controlled by procedures to prevent movement to directly above spent fuel, except as necessary to correctly load the cask system in accordance with the cask vendor's operating procedure.

[1] *All load bearing components used to lift the load, including the crane or hoist, the lifting device, and the interfacing load lift points.*

BASES

TNC and APPLICABILITY

The purpose of this administrative limiting condition for operation is to control the movement of heavy loads in or around the spent fuel pool.

A "heavy load" is defined as any load (a mass or weight suspended from the crane's hook) greater than the weight of a fuel assembly, including its heaviest insert and handling tool.

TNC 8.9.1 contains a Note to alert operators that TS 5.2.2.e provides additional requirements (an individual qualified in radiation protection procedures being onsite) when moving any load over storage racks containing fuel. It is prudent to have an individual qualified in radiation protection procedures on site for various activities that may affect radiological conditions (e.g., during fuel handling operations or movements of loads over storage racks containing fuel). The requirements in TS 5.2.2.e apply regardless of the weight of the load being moved (not just heavy loads). However, since a load is defined as a mass or weight suspended from the crane's hook, the lifting assembly itself is not considered a load (References 14 and 15).

The requirements of TNC 8.9.1 apply whenever any load is lifted in or around the spent fuel pool.

CONTINGENCY MEASURES

A.1, A.2, and A.3

If the requirements of TNC 8.9.1 are not met, actions are immediately needed to place the load in a safe condition and to cease further movement of loads over the spent fuel pool until compliance with TNC 8.9.1 is restored.

TECHNICAL VERIFICATION REQUIREMENTS

There are no TECHNICAL VERIFICATION REQUIREMENTS associated with TRM 8.9.1.

REFERENCES

1. License Amendment No. 200, dated November 20, 2008 and License Amendment No. 205, dated April 30, 2009.
2. Kewaunee Power Station Updated Safety Analysis Report (USAR) section 9.5, "Fuel Handling System."
3. USAR section 14.2.1, "Fuel Handling Accidents."
4. NUREG 0612, "Control of Heavy Loads at Nuclear Power Plants."

BASES

REFERENCES (continued

5. Letter from Darrell G. Eisenhut (NRC) to All Licensees of Operating Plants, Applicants for Operating Licenses, and Holders of Construction Permits, "Control of Heavy Loads," dated December 22, 1980.
6. Letter from Darrell G. Eisenhut (NRC) to Licensees, "Control of Heavy Loads (Generic Letter 81-07)," dated February 3, 1981.
7. Letter from Steven A. Varga (NRC) to C.W. Geisler (WPSC), "Control of Heavy Loads (Phase I)," dated March 16, 1984.
8. Letter from C.W. Geisler (WPSC) to D.G. Eisenhut (NRC), "Control of Heavy Loads – Nine-Month Response," dated March 9, 1983.
9. Letter from C.W. Geisler (WPSC) to D.G. Eisenhut (NRC), "Control of Heavy Loads," dated April 4, 1983.
10. Letter from A. Schwencer (NRC) to E.W. James (WPSC), dated March 6, 1979 (License Amendment 26).
11. 52 FR 3788, "Nuclear Regulatory Commission - Proposed Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," dated February 6, 1987.
12. WCAP-11618, "Methodically Engineered, Restructured and Improved, Technical Specifications," dated November 1987.
13. NUREG 0554, "Single-Failure-Proof Cranes for Nuclear Power Plants."
14. Letter from Mark D. Sartain (DEK) to Document Control Desk (NRC), "Supplement 3: License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated March 13, 12014.
15 License Amendment 212 and associated NRC Safety Evaluation dated June 9, 2014.

BASES

BACKGROUND

Continuous monitoring of radiation levels provides immediate indication of an unsafe condition.

TNC and APPLICABILITY

This TNC requires that radiation levels be monitored in the spent fuel pool area during fuel movement or during movement of fuel assembly components. A minimum of one radiation monitor capable of detecting releases from a postulated fuel handling accident must be in operation in this area during fuel movement or during movement of fuel assembly components.

Radiation monitors that are acceptable for satisfying this TNC are as follows (minimum one required).

Spent Fuel Pool

R-5
R-10

Other radiation monitors may be used to satisfy this TNC provided that an evaluation determines that the monitor is capable of detecting releases from a postulated fuel handling accident.

CONTINGENCY MEASURES

A.1

If at least one required radiation monitor is not in operation in the spent fuel pool area, actions must immediately be initiated to: place any fuel assemblies or fuel assembly components that are being moved into a safe condition and cease fuel movement.

TECHNICAL VERIFICATION REQUIREMENTS

TVR 8.9.4.1

A verification that radiation levels are continuously monitored in the spent fuel pool area is required to be performed before fuel movement or movement of fuel assembly components begins and every 24 hours thereafter.

REFERENCES

1. USAR 14.2.1.3 Fuel Handling Accident Method of Analysis

10.0 ADMINISTRATIVE CONTROLS

10.2 Fire Brigade

1. A Fire Brigade of at least three members is maintained on-site at all times. The Fire Brigade does not include any personnel required for other essential Emergency Response Organization functions during a fire emergency.

2. The Fire Brigade is comprised of a Fire Brigade leader and two Fire Brigade members. Personnel with knowledge of plant systems are on-site at all times to assist the Fire Brigade in the event of a fire. Such a person may be a member of the Fire Brigade.

3. Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to within the minimum requirements.

10.0 ADMINISTRATIVE CONTROLS

10.3 Iodine Monitoring Program

A program shall be provided that will ensure the capability to accurately determine the airborne in-plant iodine concentration under accident conditions. This program shall include the following:

1. Training of personnel;
2. Procedures for monitoring; and
3. Provisions for maintenance of sampling and analysis equipment.

Deleted

10.0 ADMINISTRATIVE CONTROLS

10.4 Setpoint Control Program (SCP)

10.4.1 Purpose

a. Establishes the requirements for ensuring that setpoints for automatic protective devices are initially within and remain within the assumptions of the applicable safety analysis.

b. Ensures that testing of automatic protective devices related to variables having significant safety functions as delineated by 10 CFR 50.36 (c) (1) (ii) (A) verifies that instrumentation will function as required.

Deleted

10.4.2 Notes

a. This Setpoint Control Program (SCP) for Kewaunee Power Station (KPS) satisfies the requirements of Technical Specification (TS) 5.5.16. This program was developed utilizing the guidance in TSTF-493 Rev. 4. (Reference

b. The intent of the program is to maintain the setpoints referenced from Technical Specifications in a licensee controlled document.

c. The Setpoints contained in "Plant Setpoint Control Program (SCP)" are Category "A" Setpoints per NAD-04.06, "Plant Setpoint Control." (Reference d.)

d. This program is applicable to all Nuclear Staff and plant personnel.

10.4.3 Guidance

a. The SCP ensures the Nominal Trip Setpoint (NTSP), Allowable Value (AV), As-Found Tolerance (AFT), and As-Left Tolerance (ALT) (as applicable) are listed as approved by the NRC for the applicable Functions in the following Technical Specifications:

1. LCO 3.3.1,"Reactor Protection System (RPS) Instrumentation"
2. LCO 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation Functions"
3. LCO 3.3.5, "Loss of Offsite Power (LOOP) Diesel Generator (DG) Start Instrumentation"
4. LCO 3.3.6, "Containment Purge and Vent Isolation Instrumentation"
5. LCO 3.3.7, "Control Room Post Accident Recirculation (CRPAR) Actuation Instrumentation"

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ATTACHMENT 2

TECHNICAL SPECIFICATIONS BASES CHANGES AND TECHNICAL REQUIREMENTS MANUAL CHANGES

TECHNICAL REQUIREMENTS MANUAL

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DOMINION ENERGY KEWAUNEE, INC.

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