

WISCONSIN PUBLIC SERVICE CORPORATION



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

December 6, 1983

Director, Office of Nuclear Reactor Regulation
 Attention: Mr. D. G. Eisenhut, Director
 Division of Licensing
 Office of Nuclear Reactor Regulation
 U. S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Dear Mr. Eisenhut:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
Inservice Inspection Technical Specifications

- References: 1) Letter from E. W. James to Director, NRR dated April 15, 1977
 2) Letter from E. W. James to Director, NRR dated July 18, 1977
 3) Letter from E. W. James to A. Schwencer dated February 9, 1978
 4) Letter from E. R. Mathews to A. Schwencer dated May 1, 1981
 5) Letter from E. R. Mathews to S. A. Varga dated May 7, 1982

In references 1 through 5 we provided you with proposed Technical Specification Amendments which included a tabulation of all the inservice inspection requirements of the 1974 Edition of the ASME Code (Section XI) including all addenda through the Summer 1975. The bases for relief requests and alternate testing were also provided in the proposed technical specification amendment submissions.

In accordance with 10CFR50.55a(g)5(i) we are preparing an updated Inservice Inspection Plan. The next 120-month inspection interval starts June 16, 1984; therefore, in accordance with 10CFR50.55a(g)4(ii) we are updating the plan to address the requirements of the 1980 edition of the ASME Code (Section XI) including all addenda through the Winter 1981.

10CFR50.55a(g)5(ii) requires licensees to apply to the commission for amendment of the technical specifications if the revised inservice inspection program conflicts with the technical specifications for the facility. This application is required to be submitted at least six months prior to the start of the period during which the new plan becomes applicable. In the case of the Kewaunee Plant, the technical specification revision should be submitted by

December 16, 1983.

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The project to revise and update both the Inservice Inspection (ISI) Program and the Inservice Testing (IST) Program (pumps and valves) has been in progress for about a year. Draft copies of the revised ISI plan are currently being reviewed by WPS personnel and revisions to the draft are being incorporated. The draft IST program is nearing completion and will soon receive internal distribution for comment. It is the intent of WPS to conduct a thorough and detailed review of the program prior to the technical specification submittal. The internal review is aimed at eliminating any incompleteness or inaccuracies in the plans. Because of the extensive and comprehensive nature of these documents, the review process will be more time-consuming than anticipated.

A submittal of the revised technical specification to you by December 16, 1983 would require the personnel reviewing the plan to expedite and limit their review. Personnel unavailability due to other work-related responsibilities and vacation schedules during the holiday season has further limited the time available for review. We therefore request an extension of the submittal date until January 13, 1984.

We feel the extension of the submittal date to January 13, 1984 is justified for the following reasons:

- 1) The WPS detailed internal review is intended to eliminate any errors or inconsistencies in the plan prior to the technical specification and relief request submittal. This detailed review prior to the technical specification and relief request submittal will greatly reduce the amount of future correspondence concerning plan modification.
- 2) The one-month extension does not significantly reduce the time available for NRC review. The revised ISI and IST plans will become effective on June 16, 1984; however, due to our refueling outage schedule, the revised ISI plan (NDF exams) is not scheduled to be implemented until our spring refueling outage in 1985.

We request relief from the requirements of 10CFR50.55a(g)5(ii) and we propose to submit our revised Technical Specifications and relief requests by January 13, 1984. We feel the relief is warranted based on the justification provided above. This request has been discussed with our NRC Project Manager.

Very truly yours,

Charles A. Schock for

C. W. Giesler
Vice President - Nuclear Power

DSN/js

cc - Mr. S. A. Varga, US NRC
Mr. Robert Nelson, US NRC