

September 13, 2000

Mr. Mark Reddemann
Site Vice President
Kewaunee and Point Beach Nuclear Plants
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

SUBJECT: KEWAUNEE INSPECTION REPORT 50-305-00-14(DRP)

Dear Mr. Reddemann:

On August 14, 2000, the NRC completed an inspection at your Kewaunee Nuclear Power Plant. The results of this inspection were discussed on August 14, 2000, with Mr. K. Weinhauer, Mr. K. Hoops, and other members of your staff. The enclosed report presents the results of that inspection.

The inspection was an examination of activities conducted under your license as they relate to reactor safety, performance indicator verification, event followup, and compliance with the Commission's rules and regulations and with the conditions of your license. Within those areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel.

The NRC identified one issue that was evaluated under the significance determination process and was determined to be of very low significance (Green). The issue was determined to involve a violation of NRC requirements. However, the violation was not cited due to the very low safety significance and because it was entered into your corrective action program. If you contest this Non-Cited Violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, Region III; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Kewaunee facility.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available **electronically** for public inspection in the NRC Public Document Room **or** from the *Publicly Available Records (PARS) component of NRC's document system (ADAMS)*. *ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).*

Sincerely,

Original signed by
Christine Lipa, Acting Chief

Christine Lipa, Acting Chief,
Reactor Projects Branch 2

Docket No. 50-305
License No. DPR-43

Enclosure: Inspection Report 50-305-00-14(DRP)

cc w/encl: K. Weinbauer, Assistant Site Vice President, Kewaunee Plant
B. Burks, P.E., Director, Bureau of Field Operations
Chairman, Wisconsin Public Service Commission
State Liaison Officer

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Sincerely,

/s/Christine Lipa

Christine Lipa, Acting Chief,
Reactor Projects Branch 2

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-305
License No: DPR-43

Report No: 50-305/00-14(DRP)

Licensee: Nuclear Management Company

Facility: Kewaunee Nuclear Power Plant

Location: N 490 Highway 42
Kewaunee, WI 54216

Dates: June 23, 2000, through August 14, 2000

Inspectors: J. Lara, Senior Resident Inspector
Z. Dunham, Resident Inspector
R. Powell, Resident Inspector
D. Funk, Regional Inspector

Approved by: Christine Lipa, Acting Chief
Reactor Projects Branch 2
Division of Reactor Projects

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness

Radiation Safety

- Occupational
- Public

Safeguards

- Physical Protection

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW, or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

Summary of Findings

NRC Inspection Report 50-305-00-14, on 06/23-08/14/2000; Nuclear Management Company; Kewaunee Nuclear Power Plant; Unit 1. Post Maintenance Testing.

The inspection was conducted by resident inspectors and a regional specialist. This inspection identified one green issue, which was a non-cited violation. The significance of the issue is indicated by its color (green, white, yellow, red) and was determined by the Significance Determination Process.

Cornerstone: Mitigating Systems

- Green. On June 26, 2000, during a review of post maintenance testing requirements following maintenance performed on the control room post accident system charcoal filter heat detector, the inspectors identified that maintenance technicians had not completed the component re-test requirements, as required by a preventative maintenance procedure prior to the system being returned to an operable status. On July 7, the inspectors identified a second example of failing to complete component re-test requirements following maintenance on the zone special ventilation system charcoal filter heat detector as required.

The issue was considered to be of very low safety significance based on the determination that although the licensee had not completed all of the component retest requirements prior to returning the equipment to service, the subsequent testing determined that the equipment was in an operable status. The failure to complete the component retest requirements in accordance with site procedures was identified as a Non-Cited Violation. (Section 1R19)

Report Details

Summary of Plant Status: The unit was operated at approximately 94 percent power during the inspection report period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R04 Equipment Alignments

a. Inspection Scope

During this inspection period, the inspectors verified the correct valve positions for portions of 'B' diesel generator (DG) and safety injection (SI) system using the system piping and instrumentation drawings and the system lineup checklist. These walkdowns were performed while surveillance testing activities were performed on the redundant train. The inspectors observed that instrumentation valve configurations and appropriate pressure and flow meter indications were also acceptable. The inspectors periodically verified proper installation of hangers and supports, verified operational status of support systems, observed proper control room switch positions and local breaker positions for the system, and reviewed abnormal system operating procedures. The inspectors also evaluated other conditions such as adequacy of housekeeping, the absence of fire ignition sources, and proper labeling.

The following documents were reviewed:

- N-SI-33-CL, "Safety Injection System Prestartup Checklist," Revision AE
- N-DGM-10-CLB, "Diesel Generator B Prestartup Checklist," Revision F

b. Findings

There were no findings identified.

1R05 Fire Protection

a. Inspection Scope

The inspectors performed walkdowns of the 'A' DG and associated fuel oil day tank room, dedicated shutdown panel, residual heat removal system valve gallery, component cooling water and SI pump areas, and the facility's relay room. Emphasis was placed on control of transient combustibles and ignition sources; the material condition, operational lineup, and operational effectiveness of the fire protection systems, equipment, and features; and the material condition and operational status of fire barriers used to prevent fire damage or fire propagation.

In particular, the inspectors verified that all observed transient combustibles were being controlled in accordance with the licensee's administrative procedures. In addition, the

inspectors observed the physical condition of fire detection devices, such as overhead sprinklers, and verified that any observed deficiencies did not impact the operational effectiveness of the system. The inspectors observed the physical condition of portable fire fighting equipment, such as portable fire extinguishers, and verified the equipment was located appropriately and that access to the extinguishers was unobstructed. The inspectors verified that fire hoses were installed at their designated locations. The inspectors verified that the physical condition of the hoses was satisfactory and that access to the hoses was unobstructed. The inspectors observed the physical condition of passive fire protection features such as fire doors, ventilation system fire dampers, fire barriers, fire zone penetration seals, and fire retardant structural steel coatings. The inspectors verified the passive fire protection features were properly installed and in good physical condition.

The following documents were reviewed:

- Fire Plan Procedure (FPP) 08-07, "Control of Ignition Sources," Revision D
- FPP 08-01, "Fire Plan Operability, Surveillance, and Contingency Requirements," Revision C
- FPP 08-08, "Control of Transient Combustibles," Revision A
- FPP 08-12, "Fire Prevention Tour," Revision B
- FPP 08-14, "Fire Protection Shutdown Policy," Original Revision
- Kewaunee Fire Protection Program Plan, Revision 3
- Kewaunee Assessment Process (KAP) Work Order (WO) 2415

b. Findings

There were no findings identified.

1R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors reviewed the licensee's implementation of the maintenance rule requirements to ensure that component and equipment failures were identified, entered, and scoped within the maintenance rule and that select structures, systems, or components were properly categorized and classified as (a)(1) or (a)(2) in accordance with 10 CFR 50.65. The inspectors also verified that issues were identified at an appropriate threshold and entered in the corrective action program.

Specific components or system problems evaluated were:

- Failure of Condenser Air Ejector Gas Monitor R-15 and Steam Generator Blowdown Liquid Sample Monitor R-19 (KAP WOs 0600, 0891, 99-217515-000)
- SI Pump B Unavailability (KAP WO 0186)
- Unavailability and Failure of Bus 5 (KAP WO 1192)
- Failures of Control Room Air Conditioning System (KAP WOs 99-216013-000, 98-002434-000, 99-002824-000, 99-002934-000)

In addition to the KAPs listed above, the inspectors reviewed the following documents:

- Nuclear Administrative Directive (NAD) 8.20, "Maintenance Rule Implementation," Revision A
- General Nuclear Procedure 8.20.1, "Maintenance Rule Scoping and Performance Criteria," Revision A
- General Nuclear Procedure 8.20.2, "Maintenance Rule Data Evaluation and Goal Setting," Revision A

b. Findings

There were no findings identified.

1R13 Maintenance Risk Assessment and Emergent Work Evaluation

a. Inspection Scope

The inspectors reviewed the licensee's evaluation of plant risk, scheduling, and configuration control during the planned and emergent work activities listed below. In particular, the inspectors verified that the licensee's planning and management of on-line risk were adequate. The inspectors also verified that licensee actions to address increased on-line risk during these periods were in accordance with approved administrative procedures. The inspectors reviewed appropriate sections of Surveillance Procedures (SP), the Updated Safety Analysis Report (USAR) and Technical Specifications (TS), interviewed licensee personnel, reviewed NAD 8.2, "Work Request/Work Order," Revision D, and reviewed the licensee's Individual Plant Examination, Section 5.0, "Core Damage Frequency Quantification."

- SP 42-321A, "Test of Step 0 and 6 of Aux Feedwater Pump A Aux Lube Oil Pump," Revision A
- SP 42-321B, "Test of Step 0 and 6 of Aux Feedwater Pump B Aux Lube Oil Pump," Revision A
- SP 42-322A, "Bus 5 Auto Inhibit Relay Test," Revision A

b. Findings

There were no findings identified.

1R14 Personnel Performance During Non-routine Plant Evolutions

a. Inspection Scope

On July 27, 2000, the inspectors evaluated the control room operator's response to the unexpected trip of the 'B' charging pump during performance of Procedure SP 42-322B, "Bus 6 Auto Inhibit Relay Test," Revision A. The operator responded to the equipment problem and took manual control of the operating 'C' charging pump to restore

pressurizer pressure. The inspector reviewed alarm response procedures, chemical and volume control operations procedures, Procedure SP 42-322B, and KAP WO 2609.

b. Findings

There were no findings identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed the technical adequacy of operability evaluations to ensure that the system operability was properly justified and the system remained available, such that no unrecognized increase in risk occurred.

The inspectors reviewed the following operability evaluations:

- KAP WO 2286 written to document the failure of a service water (SW) drain inspection cover resulting in water being sprayed near the SW pumps.
- KAP WO 2266 documented a problem with the torque switch for blowdown isolation valve BT-2B actuating at a greater torque value than expected.
- KAP WO 2412 written to document a cracked retaining ring on the auxiliary feedwater pump oil filter housing.
- KAP WO 2643 documented an under-frequency relay on Bus 2 out of calibration.
- KAP WO 2396 documented a reactor coolant system wide range pressure transmitter which failed low.

b. Findings

There were no findings identified.

1R17 Permanent Plant Modifications

a. Inspection Scope

The inspectors reviewed Design Change Request 3163 associated with modification of the actuating circuits for SW Valves, SW-1300A/B and SW-1306A/B. The inspectors also reviewed the safety evaluation, USAR, operations and emergency operating procedures, attended the Plant Operations Review Committee meeting, and reviewed logic and schematic drawings.

b. Findings

There were no findings identified.

1R19 Post Maintenance Testing

a. Inspection Scope

During post maintenance testing activities, the inspectors evaluated whether the planned tests were adequate for the scope of the maintenance work which had been performed and that the testing acceptance criteria were clear and demonstrated operational readiness consistent with the design and licensing basis documents. Following the completion of the test, the inspectors verified that the test equipment was removed and that the equipment was returned to a condition in which it could perform its safety function. Post maintenance test activities were observed for the following components:

- Control Room Post Accident Recirculation System Charcoal Filter Heat Detector
- Zone Special Ventilation Vent System Charcoal Filter Heat Detector
- SW pump 1A2 motor

The following documents were reviewed:

- Preventative Maintenance Procedures (PMP) 08-26, "FP-Fire Protection System (FP) Control Rm Post Accident Recirc System Charcoal Filter Heat Detector Test," Revision F
- PMP 08-27, "FP-Zone SV Vent System Charcoal Filter Heat Detector Test," Revision G
- SP 14-026A, "Auxiliary Bldg Special Ventilation Train A Operability Test," Revision E
- SP 02-138, "Service Water Pump and Valve Test - IST," Revision AQ
- SP 25-263A, "Control Room Post Accident Recirc Train A Operability Test," Revision E
- KAP WOs 2400 and 2262

b. Findings

On June 26, 2000, the inspectors identified that maintenance technicians had not completed the component re-test requirements as required by Procedure PMP 08-26 prior to the system being returned to an operable status. This finding was identified during review of post maintenance testing requirements following maintenance performed on the control room post accident system charcoal filter heat detector. Specifically, Step 6.3 required that inspection and testing be completed and data sheets properly documented and signed, and Step 6.4 required that Quality Programs Procedure 8.2.18, "System Pressure Test Record," be completed and documented in the applicable data sheets. The inspectors also noted that the system had not been functionally tested following the maintenance and discussed this issue with the licensee. The licensee subsequently successfully performed Procedure SP 25-263A to verify operability of the system. The licensee documented the inspectors' findings in KAP WO 2262.

On July 7, 2000, the inspectors identified a second example of failing to complete component re-test requirements following maintenance on the zone special ventilation

system charcoal filter heat detector as required by Procedure PMP 08-27. The licensee subsequently performed Procedure SP 14-026A to verify operability of zone special ventilation system.

Technical Specifications Section 6.8.a required that written procedures shall be established and implemented that meet the requirements of Section 5.3 of ANSI N18.7-1976. Section 5.3 required that activities affecting quality shall be described by written procedures and shall be accomplished in accordance with these procedures. The failure to complete the component retest requirements in accordance with Procedures PMP 08-26 and PMP 08-27 (Steps 6.3 and 6.4) prior to returning the affected equipment to an operable status was determined to be a violation. This violation is being treated as a Non-Cited Violation, consistent with Section VI.A.1 of the NRC Enforcement Policy (**NCV 50-305/2000014-01**). This is in the licensee's corrective action program as KAP WO 2262.

The inspectors used the SDP to evaluate the safety significance of this issue. The issue was considered to be of very low safety significance (Green) based on the determination that although the licensee had not completed all of the component retest requirements prior to returning the equipment to service, the subsequent testing determined that the equipment was in an operable status.

The inspectors concluded that the above findings revealed inadequate use of maintenance procedures to ensure maintenance was completed prior to returning systems to service, a lack of acceptable oversight by the quality control organization to ensure that quality program procedures were completed prior to returning systems to service, and lack of guidance to operations personnel to determine the type of operational functional tests required to establish system operability. The inspectors also concluded that the corrective actions for the incomplete testing on June 26, 2000, were not thorough or timely. As a result, incomplete testing occurred again on July 7, 2000.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors observed surveillance testing on risk-significant equipment and verified that the equipment was capable of performing its intended safety function and that the surveillance tests satisfied the requirements contained in TS, the USAR, and licensee procedures. During the surveillance tests, the inspectors verified that the test was adequate to demonstrate operational readiness consistent with the design and licensing basis documents, and that the testing acceptance criteria was clear. The inspectors also verified that the test was performed as written and all testing prerequisites were satisfied and that the test data was complete, appropriately verified, and met the requirements of the testing procedure. Following the completion of the test, the inspectors verified that the test equipment was removed and that the equipment was returned to a condition in which it could perform its safety function.

The inspectors observed and reviewed the performance of the following surveillance testing on risk significant equipment:

- SP 42-312A, "Diesel Generator A Availability Test," Revision I, and related Procedure PMP 42-03, "Train 'A' Auto Sequencing Test With Diesel A in Pullout"
- SP 42-312B, "Diesel Generator B Availability Test," Revision I
- SP 42-321A, "Test of Step 0 and 6 of Aux Feedwater Pump A Aux Lube Oil Pump," Revision A
- SP 42-321B, "Test of Step 0 and 6 of Aux Feedwater Pump B Aux Lube Oil Pump," Revision A
- SP 42-322A, "Bus 5 Auto Inhibit Relay Test," Revision A

b. Findings

There were no findings identified.

Cornerstone: Emergency Preparedness

1EP4 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

The inspectors reviewed Revision 23 to the Kewaunee Nuclear Power Plant Emergency Plan, which was submitted by licensee letter, dated March 14, 2000, to verify that the changes did not decrease the effectiveness of the plan. The emergency plan revision was submitted in accordance with 10 CFR 50.54(q).

b. Findings

There were no findings identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification - Scrams With Loss of Normal Heat Removal

Cornerstone: Initiating Events

a. Inspection Scope

The inspectors reviewed the licensee's performance indicator (PI) data collection process and historical data through the second quarter of 2000. The following documents were reviewed:

- NAD-3.18, "NRC Performance Indicators," Revision A
- "Guideline for Data Collection and Reporting NRC Performance Indicators" dated June 22, 2000
- Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0

b. Findings

The inspectors identified a discrepancy regarding the licensee's implementation of the PI guidance. Specifically, the licensee changed the definition of a "loss of the normal heat removal path" from that discussed in the PI guidance document. Document NEI 99-02, defined the PI as "the number of unplanned and planned scrams while critical, both manual and automatic, during the previous 12 quarters that also involved a loss of the normal heat removal path through the main condenser prior to establishing reactor conditions that allow the use of the plant's normal long term heat removal systems." The NEI guidance further defines "loss of normal heat removal path" as "decay heat cannot be removed through the main condenser when any of the following conditions occur: loss of main feedwater [emphasis added], loss of main condenser vacuum, closure of main steam isolation valves, or loss of condenser steam dump capability."

In contrast, the licensee's PI guideline document defines "loss of normal heat removal path" as "decay heat cannot be removed through the main condenser when any of the following conditions occur: loss of auxiliary feedwater [emphasis added], ... "

The licensee's basis for the revised PI definition was that auxiliary feedwater (AFW) was the "normal heat removal path" because following plant trips, AFW pumps will auto-start due to the shrink in the steam generator level. Additionally, the main feedwater (MFW) flow path is automatically isolated and per emergency operating procedures, the MFW pumps will be stopped if the AFW pumps are operating. Therefore, the AFW is the "normal heat removal path" for this PI and the licensee would only count this type of event toward the PI if the AFW system failed to function.

The inspectors disagreed with the licensee's PI definition. As the NEI guidance discussed, if the MFW source was isolated or the pumps were secured following a trip as designed to limit the cooldown rate, the event would not count toward the PI. However, if the MFW pumps tripped while at power and caused a reactor and turbine trip, this should be counted toward the PI.

A practical example of this PI concern was the licensee's 1998 plant trip with a loss of main feedwater (Licensee Event Report (LER) 50-305/1998-005-01). In February 1998, the licensee experienced a plant trip due to a relay which energized during surveillance testing activities. When the relay energized, this caused a turbine/reactor trip, both MFW pumps tripped, and MFW isolation valves closed. The trip of both MFW pumps auto-started both motor-driven AFW pumps. The licensee determined that the trip did not count toward the PI since AFW auto-started and therefore, there was no "loss of normal heat removal path." The inspectors considered that the event discussed in the LER should count toward the PI.

This issue is an Unresolved Item (URI) pending further NRC review of the licensee's definition of this PI and whether the 1998 plant trip should be counted toward this PI (**URI 50-305/2000014-02**).

4OA3 Event Follow-up

(Closed) LER 305/2000-002-00: Failure to Perform Second Level Review Results in Train B of the Shield Building Ventilation System Being Incorrectly Returned to Service. The circumstances pertaining to this LER were previously reviewed and resulted in an NCV (50-305/2000004-01). This LER is closed.

(Closed) LER 305/2000-005-00: Main Steam Isolation Valve Exceeds TS Acceptance Criteria and Design Basis for Valve Closure Time. During the performance of a surveillance test while in a refueling shutdown, the main steam isolation valve for the 'B' steam generator exceeded the TS requirement of 5 seconds. The valve closed in 6 seconds. The licensee declared the valve inoperable, replaced the valve packing, and subsequently successfully tested the valve. There were no findings identified. This LER is closed.

(Closed) LER 305/2000-009-00: Manual Reactor Trip Initiated - Failure of Reactor Coolant Pump Temperature Indication Required Action to Trip the Pump. This LER pertained to a plant trip and engineered safety feature actuation due to a failed resistance temperature detector. The circumstances involving this event were previously documented in Inspection Report 50-305-2000-008, Section OA3. There were no findings identified. This LER is closed.

(Closed) LER 305/2000-011-00: Target Band Alarm Setpoint Not Updated with the Current Target Delta Flux Difference Value as Required by TS. The circumstances pertaining to this LER were previously reviewed and resulted in an NCV (50-305/2000008-02). This LER is closed.

(Closed) LER 305/2000-012-00: Failure to Expand Scope to Test Additional Relief Valves as Required by TSs. The circumstances pertaining to this LER were previously reviewed and resulted in an NCV (50-305/2000008-03). This LER is closed.

4OA4 Other Activities - Temporary Instruction 2515/144, Performance Indicator Data Collecting and Reporting Process Review

a. Inspection Scope

The inspectors reviewed the licensee's PI data collecting and reporting process to determine whether the licensee was appropriately implementing PI guidance. The inspectors reviewed the licensee's administrative procedures and guidelines for the collection and processing of supporting data for the following PIs:

- Initiating Events - Unplanned Power Changes per 7000 Critical Hours
- Mitigating Systems - Safety System Unavailability and Safety System Functional Failures
- Emergency Preparedness - Emergency Response Organization Drill Participation
- Occupational Radiation Safety - Occupational Exposure Control Effectiveness
- Physical Protection - Protected Area Security Equipment Performance Index

The following documents were reviewed:

- NAD-3.18, "NRC Performance Indicators," Revision A
- "Guideline for Data Collection and Reporting NRC Performance Indicators" dated June 22, 2000
- NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0

b. Findings

The inspectors identified inconsistencies within the licensee's guidelines as compared to the NEI guidance document, as well as examples of un-clear guidance. These examples were discussed with the licensee for review and evaluation. The inspectors also identified a concern regarding the Emergency Response Organization Drill Participation PI. Guidance Document NEI 99-02, discussed the roles of the Technical Support Center (TSC) and Emergency Operations Facility (EOF) communicators who provide offsite notifications. The licensee identified the site Emergency Director and the Emergency Response Manager as the TSC and EOF communicators, respectively, for the purposes of tracking drill participation. These individuals were selected rather than the Emergency Plan designated communicators since these are the responsible individuals for approving all offsite communications.

The inspectors disagreed with the licensee's interpretation since the subject senior managers will always be onsite during drills and emergencies. Therefore, PI drill participation criteria will always be achieved for the TSC and EOF communicators. The inspectors also noted that the Emergency Director and Emergency Response Manager positions were already being tracked for the TSC and EOF Senior Managers positions.

The issue is considered a URI pending further NRC review (**URI 50-305/2000014-03**).

4OA6 Management Meetings

Exit Meeting Summary

On August 14, 2000, the inspectors presented the inspection results to the general and plant managers and members of the Kewaunee staff. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Wisconsin Public Service Corporation

D. Braun, Assistant Plant Manager - Operations
D. Cole, Manager, Assessments
K. Evers, Manager, Nuclear Support Services
G. Harrington, Plant Licensing Supervisor
K. Hoops, Plant Manager, Kewaunee Plant
B. Koehler, Manager, Quality Programs
M. Marchi, Vice President - Nuclear
J. Mortonson, Assistant Plant Manager - Maintenance
M. Reinhart, Superintendent, Radiation Protection
J. Schweitzer, Manager, Engineering and Technical Support
J. Stoeger, Superintendent, Operations
T. Webb, Nuclear Licensing Director
K. Weinbauer, General Manager, Kewaunee Plant

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-305/2000014-01	NCV	Failure to Complete Component Retest Requirements in Accordance with PM Procedure (1R19)
50-305/2000014-02	URI	PI Definition for Scrams with Loss of Normal Heat Removal (4OA1)
50-305/2000014-03	URI	TSC and EOF Communicator Positions for PI Data (4OA4)

Closed

50-305/2000014-01	NCV	Failure to Complete Component Retest Requirements in Accordance with PM Procedure (1R19)
305/2000-002-00	LER	Failure to Perform Second Level Review Results in Train B of the Shield Building Ventilation System Being Incorrectly Returned to Service (4OA3)
305/2000-005-00	LER	Main Steam Isolation Valve Exceeds TS Acceptance Criteria and Design Basis for Valve Closure Time (4OA3)
305/2000-009-00	LER	Manual Reactor Trip Initiated - Failure of Reactor Coolant Pump Temperature Indication Required Action to Trip the Pump (4OA3)
305/2000-011-00	LER	Target Band Alarm Setpoint Not Updated with the Current Target Delta Flux Difference Value as Required by TS (4OA3)

305/2000-012-00 LER Failure to Expand Scope to Test Additional Relief Valves as Required by TS (4OA3)

Discussed

None.

LIST OF BASELINE INSPECTIONS PERFORMED

The following inspectable area procedures were used to perform inspections during the report period. Documented findings are contained in the body of the report.

<u>Procedure Number</u>	<u>Title</u>	<u>Section</u>
71111.04	Equipment Alignments	R04
71111.05	Fire Protection	R05
71111.12	Maintenance Rule Implementation	R12
71111.13	Maintenance Risk Assessment and Emergent Work Evaluation	R13
71111.14	Personnel Performance During Non-routine Plant Evolution	R14
71111.15	Operability Evaluations	R15
71111.17	Permanent Plant Modifications	R17
71111.19	Post Maintenance Testing	R19
71111.22	Surveillance Testing	R22
71114.04	Emergency Action Level and Emergency Plan Changes	EP4
71151	Performance Indicator Verification	OA1
71153	Event Follow-up	OA3
2515/144	Performance Indicator Data Collecting and Reporting Process Review	OA4

LIST OF ACRONYMS USED

AFW	Auxiliary Feedwater
CFR	Code of Federal Regulations
DG	Diesel Generator
DRP	Division of Reactor Projects, Region III
EOF	Emergency Operations Facility
FP	Fire Plan
FPP	Fire Plan Procedure
IR	Inspection Report
KAP	Kewaunee Assessment Process
LER	Licensee Event Report
MFW	Main Feedwater
NAD	Nuclear Administrative Directive
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
PI	Performance Indicator
PMP	Preventative Maintenance Procedure
SDP	Significance Determination Process
SP	Surveillance Procedure
SW	Service Water
TS	Technical Specification
TSC	Technical Support Center
URI	Unresolved Item
USAR	Updated Safety Analysis Report
WO	Work Order