November 8, 2000

EA-00-214

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

SUBJECT: KEWAUNEE - NRC INSPECTION REPORT 50-305/2000015(DRS) AND PRELIMINARY WHITE FINDING AND NOTICE OF VIOLATION

Dear Mr. Reddemann:

On August 18, 2000, the NRC completed a baseline inspection at your Kewaunee Nuclear Power Plant. The preliminary results of this inspection were discussed with Mr. K. Weinhauer and other members of your staff on August 18, 2000. Following the review of the preliminary findings by an NRC Significance Determination Process Panel (SDP), you and members of your staff were informed of the results of this inspection by telephone on September 21, 2000.

The enclosed report presents the results of this inspection. The inspection was an examination of activities conducted under your license as they relate to emergency preparedness and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel. Specifically, this inspection focused on the implementation of your emergency preparedness program. In addition, we reviewed your staff's evaluation of the performance indicators for the Emergency Preparedness Cornerstone.

As described in Section 1EP3 of this report, an issue was identified concerning the failure to correct self-identified deficiencies disclosed through unannounced, off hours, staff augmentation drills during the second, third, and fourth quarters of 1999, and the second quarter of 2000. This issue was assessed using the applicable SDP and preliminarily determined to be a White finding, an issue with some increased importance to safety which may require additional NRC inspection. The issue has a low to moderate safety significance because failure to timely augment on-shift staff during an emergency could delay necessary emergency actions and decisions and could result in on-shift staff being distracted by multiple and possibly competing responsibilities.

During the inspection, the results of monthly staff augmentation drills conducted in January 1999 through July 2000 were evaluated. In 16 of those 18 drills, you failed to demonstrate that sufficient staff would respond to the site in a timely fashion as required for emergency response. In two drills, the key senior management position that leads either the onsite or offsite emergency assessment and response activities was not staffed with qualified individuals within the required timeframe. In addition, on five occasions, the management position that recommends appropriate protective measures for the public was not staffed within the timeframe required and on five occasions the management position that ensures radiological protection of onsite staff was not manned within the required timeframe. Finally, during thirteen of the eighteen drills, none of the five or six electricians assigned emergency responsibilities reported to the site within the required timeframe. In three of the remaining five occasions, electricians happened to be onsite working at the time of the drill.

Through the past eighteen months, various station personnel did not respond adequately to emergency drills. The corrective action program was ineffective in resolving this repetitively deficient performance. Corrective action reports were occasionally initiated, but were inconsistently and ineffectively used to document and resolve drill deficiencies. Performance was not effectively tracked to identify negative trends for increased management attention and identified corrective actions were not implemented. Kewaunee management did not ensure that the corrective action program and emergency response staffing were effectively implemented.

These deficiencies in implementation of your corrective action program are similar to those observed in response to the emergency notification system (sirens) performance deficiencies. Our concerns with your corrective actions on the sirens are described in our November 2, 2000, letter to you. While these deficiencies in staff augmentation and corrective action are again in the Emergency Preparedness cornerstone, it appears that the corrective action problems may be more systemic to overall program implementation.

These issues, failure to demonstrate adequate off-hours staff augmentation, and failure to correct deficiencies identified through drills and exercises, also appear to be potential violations of NRC requirements, and are being considered for enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. The current Enforcement Policy is included on the NRC's website at www.NRC.gov/OE.

Before the NRC makes a final decision on this matter, we are offering you an opportunity to provide your perspectives on the significance of the findings, the bases for your position, and whether you agree with the potential violation. We propose that you provide this information during the upcoming Regulatory Conference being scheduled to discuss the Yellow finding associated with deficiencies in your corrective action program and siren system performance, discussed in NRC Inspection Report 50-305/00-17(DRS). If you choose to discuss this issue during the upcoming Regulatory Conference, we encourage you to submit your evaluation and any differences with the NRC evaluation at least one week prior to the conference in an effort to make the conference more efficient and effective.

Please contact Gary Shear at (630) 829-9876 within seven days of the date of this letter to notify the NRC of your intentions.

Since the NRC has not made a final determination in this matter, no Notice of Violation is being issued for these inspection findings at this time. In addition, please be advised that the number and characterization of potential violations described in the enclosed inspection report may change as a result of further NRC review.

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).

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA/

John A. Grobe, Director
Division of Reactor Safety

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

Enclosure: Inspection Report 50-305/2000015(DRS)

cc w/encl: K. Weinhauer, 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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/RA/
John A. Grobe, Director
Division of Reactor Safety

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

Enclosure: Inspection Report 50-305/2000015(DRS)
cc w/encl: K. Weinhauer, 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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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No:	50-305
License No:	DPR-43
Report No:	50-305/2000015(DRS)
Licensee:	Nuclear Management Company, LLC
Facility:	Kewaunee Nuclear Power Plant
Location:	N 490 Highway 42 Kewaunee, WI 54216
Dates:	August 14 - September 21, 2000
Inspector:	Thomas J. Ploski, Senior Emergency Preparedness Analyst
Approved by:	Gary L. Shear, Chief Plant Support Branch Division of Reactor Safety

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	Radiation Safety	Safeguards
! Initiating Events	! Occupational	! Physical Protection
! Mitigating Systems	! Public	
! Barrier Integrity		
! Emergency Preparedness		

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

IR 50-305/2000015(DRS), on 08/14 - 09/21/2000; Nuclear Management Company, LLC; Kewaunee Nuclear Power Plant, Emergency Preparedness, Other Activities.

The one week on-site inspection was conducted by a regional emergency preparedness analyst. The inspection identified one potential white issue. The significance of issues is identified by their color (green, white, yellow, red) and was determined by the Significance Determination Process (SDP). This inspection focused on implementation of the emergency preparedness program, and included a review of the licensee's three performance indicators associated with the Emergency Preparedness Cornerstone.

REACTOR SAFETY

Cornerstone: Emergency Preparedness

White. Potential violations of the requirements of 10 CFR 50.47(b)(2) and (b)(14) were identified for failure to demonstrate adequate off-hours staff augmentation and failure to correct self-identified deficiencies found during quarterly, off-hours staff augmentation drills. In accordance with the SDP, this issue was preliminarily determined to have low to moderate safety significance (Section 1EP3).

The corrective action program was inconsistently and ineffectively used to address problems associated with quarterly off-hours staff augmentation drills. The deficiencies in the implementation of the corrective action program for these problems are similar to those observed in response to the emergency notification system (sirens) performance deficiencies.

Report Details

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness (EP)

1EP2 Alert and Notification System (ANS) Testing

a. Inspection Scope

The inspector discussed with cognizant licensee staff the status of ongoing corrective actions related to the ANS performance within the Kewaunee County portion of the plant's Emergency Planning Zone. The inspector also reviewed the associated self-assessment report related to ANS performance that was characterized as yellow in accordance with the criteria in NRC's Revised Reactor Oversight Program (RROP). A successful periodic ANS test, which was initiated by Kewaunee County officials, was observed. Records of periodic ANS performance tests for the period January through June 2000 were reviewed.

b. Issues and Findings

There were no findings identified.

1EP3 Emergency Response Organization (ERO) Augmentation

a. Inspection Scope

The inspector reviewed the licensee's Emergency Plan and procedures related to the conduct and self-assessment of periodic off-hours staff augmentation drills, which were performed as radio pager system tests. The inspector reviewed off-hours augmentation drill records for the period January 1999 through July 2000 and related corrective action tracking system records, which were either Kewaunee Assessment Process (KAP) reports or the EP staff's internal action tracking (EP Track) system records. The inspector also reviewed and discussed alternate provisions for activating ERO members' pagers and reviewed training records on the activation of a voice mail system and pagers related to ERO activation. The inspector reviewed the current ERO roster and discussed provisions for maintaining this roster and the ERO telephone directory. A random sample of about 40 ERO members' EP training records were reviewed to determine if their EP training was current.

b. Findings

10 CFR 50.54(q), requires a licensee to maintain in effect emergency plans which meet the 16 emergency planning standards in 10 CFR 50.47(b) and the requirements of Appendix E to Part 50. 10 CFR 50.47(b)(2), requires that timely augmentation of response capabilities be available. Section 8.2.2(2)g of Revision 22 of the Kewaunee Nuclear Power Plant (KNPP) Emergency Plan included a commitment that an unannounced radio pager response drill shall be conducted quarterly to demonstrate augmentation capabilities.

10 CFR 50.47(b)(14) requires that deficiencies identified during exercises or drills be corrected. As indicated later in this section of the inspection report, unannounced, off-hours augmentation drills were conducted and assessed by the licensee more frequently than the quarterly drill commitment in Section 8.2.2 (2) g of the licensee's emergency plan. Nevertheless, during the period from January 1999 through July 2000, only two of these drills were successful. Corrective actions were inconsistently and ineffectively used to resolve the self-identified drill problems.

Emergency Plan Implementing Procedure (EPIP) Appendix APPX-A-1,"Communication System Description," Revision AF, indicated that the radio pager system was the primary means of augmenting the onshift emergency organization. Revision H of related Emergency Preparedness Maintenance Procedure (EPMP) 9.01 indicated that radio pager response drills were off-hours, unannounced pager activation tests that the licensee performed in order to meet the aforementioned Emergency Plan commitment. The EPMP also indicated that these drills would be conducted monthly and described the methods of conducting the pager tests and gathering test results.

The EPMP 9.01 referenced Revision B of EPMP 2.6 and its attachments. The attachments to EPMP 2.6, "Emergency Preparedness Measurements," clearly identified the numbers and types of personnel associated with 30 and 60 minute augmenter positions, as well as the licensee's related interpretation of staff augmentation regulatory guidance (Table B-1 of NUREG-0654, Revision 1), and augmentation drill success and failure criteria.

The inspector determined that off-hours radio pager drills had been conducted monthly for the period January 1999 through August 2000, with the exception that the May 2000 drill was canceled due to a plant outage. Self-assessment of the August 2000 drill was ongoing during this inspection. The inspector's review of these drills' summary records ("ERO Response Data", "ERO Performance Monitoring", and "Pager Response Control Chart" forms) indicated that only the January 1999 and March 2000 drills were successful in accordance with the criteria contained in EPMP 2.6. Therefore, no successful off-hours augmentation drills were conducted during the second, third, and fourth quarters of 1999 and the second quarter of 2000, although two or three drills were conducted during each of these calendar quarters. The drill results are summarized in the following table:

Staff Augmentation Drill Results

Date	Results
January 1999	Passed
February	Failed
March	Failed
April	Failed
May	Failed
June	Failed
July	Failed
August	Failed
September	Failed
October	Failed
November	Failed
December	Failed
January 2000	Failed
February	Failed
March	Passed
April	Failed
May	Canceled
June	Failed
July	Failed

The inspector further assessed the significance of the licensee's augmentation drill failures by dividing the pager-equipped ERO members into the categories of whether or not a response position was a "key" or "non-key" ERO position per the guidance of the Nuclear Energy Institute (NEI) 99-02, Revision 0, publication. The inspector concluded the following:

(1) Key ERO Positions

- Emergency Response Manager (Senior Manager in the Emergency Operations Facility (EOF) - None of the four personnel assigned to this position would have responded to an emergency during the November 1999 drills.

- Emergency Director (Senior Manager in the Technical Support Center (TSC)) - None of the four personnel assigned to this position would have reported to the TSC to respond to an emergency in the required time frame during the June 2000 drill.

- Environmental Protection Director (EOF) - None of the personnel assigned to this position would have reported to the EOF to respond to an emergency in the required time frame during five of the eighteen evaluated drills in 1999 and 2000.

- Radiation Protection Director (TSC) - None of the personnel assigned to this position would have reported to the TSC to respond to an emergency

in the required time frame during five of the eighteen evaluated drills in 1999 and 2000.

(2) Non-Key Positions

- Electrician (Operations Support Facility) - None of the five or six personnel assigned to this position would have responded to an emergency in the required time frame during thirteen of the eighteen evaluated drills in 1999 and 2000. During three of the remaining five drills, electricians happened to be onsite working at the time of the drill.

The inspector discussed with EP staff the corrective actions associated with the self-assessed augmentation drill failures since early 1999. The EP staff indicated that off-hours pager test results were mentioned during morning meetings with plant management, and that efforts were made to keep the numbers of personnel assigned to each ERO position at pre-determined levels. However, EP staff noted that none of the five electricians, who were pager-equipped ERO members, apparently resided within a 30 minute commute from their residences to the plant. The inspector noted that the number of pager-equipped electricians declined from six to five between the June and July 1999 drills, and that only five electricians were indicated as being pager-equipped between the July 1999 and July 2000 drills.

The EP staff also referred the inspector to six Kewaunee Assessment Process (KAP) reports prepared in 1999 and 2000 to address various aspects of the augmentation process, and one 1999 “EP Track” item to assess seeking regulatory relief from having an electrician as a 30 minute augmenter. The EP staff indicated, however, that no such relief had yet been sought from NRC. The inspector concluded that KAPs and the “EP Track” item had been inconsistently and ineffectively used as a means to resolve drill performance problems that were evident from the self-assessed 16 of 18 drill failures between January 1999 and July 2000.

Implementation of the Kewaunee Emergency Plan was not necessary to respond to a significant event between January 1999 and July 2000. However, Kewaunee Nuclear Power Plant’s failure to successfully correct deficiencies identified during on-shift staff augmentation drills and demonstrate timely staff augmentation is more than minor in that failure to timely augment on-shift staff during an emergency could delay necessary emergency actions and decisions and could result in on-shift staff being distracted by multiple and possibly competing responsibilities. Further, KNPP was aware of this problem since at least January of 1999 and failed to implement effective corrective actions for this issue. The issue affected the Emergency Preparedness cornerstone and resulted in a potential violation of the regulatory requirements of 10 CFR 50.54(q), 10 CFR 50.47(b)(2) and 10 CFR 50.47(b)(14). Using the Emergency Preparedness Significance Determination Process, the NRC evaluation of this issue is that it is a matter having low to moderate safety significance (white). This issue is considered an Unresolved Item. (URI 50-305/2000015-01)

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies

a. Inspection Scope

The inspector reviewed 1999 and 2000 Quality Assessment (QA) audit and surveillance reports relevant to the EP program. The inspector also reviewed an Audit Instruction document, dated 1997, that provided guidance for performing EP program audits. The inspector reviewed and discussed samples of 1999 and 2000 KAP and EP Track system records used by EP staff to document and track corrective actions related to the EP program. The inspector verified that procedure revisions and other corrective actions were acceptably completed, as indicated in the selected sample of KAP and EP Track records.

b. Findings

There were no findings identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification

f. Inspection Scope

The inspector reviewed and discussed the licensee's methods and procedures for assessing information used to determine the values for the following three EP PIs for the period January 1999 through June 2000: ANS, ERO Drill Participation, and Drill and Exercise Performance (DEP). Samples of documentation relevant to the raw data for each indicator were reviewed and evaluated, including records of relevant Control Room Simulator training sessions, periodic siren tests, and relevant EP drills and exercises were also reviewed. The methods for determining emergency classification, and state/county notification, and offsite Protective Action Recommendation (PAR) opportunities were reviewed and discussed with EP staff. Sections of the Emergency Plan, relevant procedures, and EP training lesson plans were reviewed regarding the responsibilities associated with certain ERO positions.

g. Findings

The inspector identified two discrepancies in the licensee's methods for computing PI data versus relevant guidance in the NEI 99-02, Revision 0, publication. The first discrepancy was the licensee's incorrect interpretation of NEI 99-02 guidance on what emergency class declaration decision would be associated with an offsite PAR opportunity relevant to the DEP indicator. The aforementioned guidance, as well as the relevant NRC guidance and EPIP-AD-19, Revision O, indicated that an offsite PAR would only be associated with a General Emergency declaration. In contrast, review of 1999 and 2000 records indicated that the licensee also incorrectly counted offsite PAR opportunities for the three lower (Unusual Event, Alert, and Site Area Emergency) emergency declarations. The licensee initiated a KAP form to address this discrepancy.

The second discrepancy related to the DEP indicator. The DEP data compiled prior to April 2000 only indicated three performance opportunities associated with a General Emergency declaration during a drill or exercise. In contrast, relevant NEI 99-02 guidance indicated that four performance opportunities should be associated with a General Emergency declaration. Neither of these discrepancies would result in a change in the Performance Indicator color.

4OA5 Temporary Instruction (TI) 2515/144

a. Inspection Scope

The inspector reviewed the licensee's interpretation of relevant NEI 99-02 guidance related to the identification of "key ERO positions." The inspector also reviewed relevant EPIPs and EP training lesson plans.

b. Findings

An issue was identified regarding the licensee's selection of response positions in the TSC and EOF that would fulfill the "state/county communicator" function. Relevant NEI 99-02 guidance indicated that the position responsible for completing the state/county notification form, which would be used to document emergency declaration messages to those offsite officials, should be considered as the "state/county communicator." In contrast, the licensee selected the senior decision makers in the TSC and EOF (Emergency Director (ED) and Emergency Response Manager (ERM), respectively) to also be the positions responsible for the "state/county communicator" function.

The inspector concluded that lesson plans and procedures did not indicate that the TSC's ED and EOF's ERM were responsible for completing emergency notification message forms to be communicated by subordinates to state and county officials. Instead, these documents sufficiently indicated that the subordinate positions of TSC Director and (EOF) Engineering/Licensing Support Coordinator had some level of responsibility for ensuring that notification forms to state and county officials were completed and submitted to their senior decision maker for approval before other staff communicated these messages to offsite officials. The inspector agreed with cognizant licensee staff that the wording of the relevant EPIPs and lesson plans were inconsistent. The licensee initiated a KAP report to address the inconsistency of relevant lesson plans and procedures.

4OA6 Management Meetings

Exit Meeting Summary

The inspector presented the preliminary inspection results to Mr. K. Weinhauer and other members of licensee management on August 18, 2000. The licensee acknowledged the information presented and did not identify any information discussed as proprietary. On September 21, 2000, Mr. M. Reddemann and members of his staff were notified by telephone of the results of the NRC significance determination process panel's review of the preliminary inspection findings.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

W. Bartelme, Emergency Preparedness Coordinator
D. Cole, Plant Assessments Manager
K. Evers, Plant Support Manager
J. Ferris, Licensing Specialist
K. Hoops, Plant Manager
B. Koehler, Quality Programs Manager
J. Mueller, Administrative Specialist
M. Reddemann, Site Vice President
J. Riste, Licensing Coordinator
D. Seebart, Emergency Preparedness Process Leader
M. Stangel, Training Specialist
T. Webb, Nuclear Licensing Manager
K. Weinhauer, General Manager

NRC

J. Grobe, Director, Division of Reactor Safety
G. Shear, Chief, Plant Support Branch

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-305/2000015-01	Unresolved Item. Failure to successfully conduct quarterly, off-hours, unannounced staff augmentation drills during second, third, and fourth quarters of 1999 and second quarter of 2000.

Closed

None

Discussed

IFI 50-305/2000002-01	Reassessment of minimum shift staffing levels and staff augmentation provisions versus the guidance of Nuclear Regulatory Guide 0654, Revision 1.

LIST OF ACRONYMS USED

ANS	Alert and Notification System
DEP	Drill and Exercise Performance
DRS	Division of Reactor Safety
ED	Emergency Director
EOF	Emergency Operations Facility
EP	Emergency Preparedness
EPIP	Emergency Plan Implementing Procedure
EPMP	Emergency Preparedness Maintenance Procedure
ERM	Emergency Response Manager
ERO	Emergency Response Organization
FAQ	Frequently Asked Question
IFI	Inspection Follow-up Item
KAP	Kewaunee Assessment Process
KNPP	Kewaunee Nuclear Power Plant
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
NRR	(NRC Office of) Nuclear Reactor Regulation
NUREG	Nuclear Regulatory Guide
PAR	(offsite) Protective Action Recommendation
PI	Performance Indicator
QA	Quality Assurance
RROP	Revised Reactor Oversight Program
SDP	Significance Determination Process
TI	Temporary (inspection) Instruction
TSC	Technical Support Center

LIST OF INSPECTION PROCEDURES PERFORMED

71114.02	ANS System Testing
71114.03	ERO Augmentation
71114.05	Correction of EP Weaknesses and Deficiencies
71151	PI Verification
TI 2515/144	PI Data Collecting and Reporting Process Review
95002	Inspection for One Degraded Cornerstone or Any Three White Inputs in a Strategic Performance Area

LIST OF DOCUMENTS REVIEWED

Assessments and Audits

"Alert and Notification (Siren) System Performance Decline - Root Cause," dated July 17, 2000
"KNPP QA - Special Audit - First Quarter (2000); Revised Reactor Oversight Process (RROP); Performance Indicator (PI)"
"QA Audit Summary - Support Services - Third Quarter 1999"
"QA Audit Summary - Support Services - Fourth Quarter 1999"
Quality Surveillance Reports numbers 1560, 1653, and 1720

Miscellaneous

KNPP Emergency Plan, Sections 5, 6, and 8 and Appendix A
"Guideline for Data Collecting and Reporting of NRC Performance Indicators" - Appendix D", dated April 2000
ANS Test Records for January through June 2000
Memo to EP File, (correction of) "First Quarter NRC PI - ANS," dated April 2000
Records of September 1999 facility-wide practice exercise
Records of October 1999 NRC-evaluated exercise
Records of licensed operator requalification training sessions - second quarter 1999
Records of licensed operator requalification training sessions - first quarter 2000
Off-hours augmentation drill results performance ("ERO Performance Monitoring" Form EPMP 2.6.1), September 1999 through August 2000
Off-hours augmentation drill results summaries ("ERO Response Data" Form EPMP 2.6-2), January 1999 through July 2000
"Pager Response Control Char," undated, December 1995 through August 2000
Lesson Plan 1.2.5, "Director - Initial Skills," Revision D
Lesson Plan 1.2.6, "Notifier/Communicator - Initial Skills," Revision E
Lesson Plan 1.2.12, "EOF Support - Initial Skills," Revision B
Lesson Plan 2.1.16, "Security Notifier - Continuing," Revision A
Summary printout of EP Track action items 1998 - 2000, dated August 9, 2000
Summary printout of EP-related KAP work orders August 1999 through August 2000
Audit Instruction 3.2, "EP Program," Revision B
APPX-A-1, "Communication System Description," Revision AF
Computerized or hard copy records indicating most recent EP training dates for about 40 current ERO members

Kewaunee Assessment Process (KAP) Work Order Numbers

99-002937; 99-003326; 00-000220; 00-000380; 00-002307; 00-002354-001; 00-002354-002; 00-002354-003; 00-002354-004; 00-002354-005; 00-002354-006; 00-002750; 00-002977; 00-002978; 00-003009

Emergency Planning Tracking System (EP Track)

1999-064; 1999-069; 1999-093; 1999-185; 2000-001; 2000-031; 2000-054; 2000-058; 2000-064; 2000-067; 2000-075;

Procedures

EP-AD-19, “Protective Action Guidelines,” Revision O
EP-EOF-02, “EOF Activation,” Revision W
EP-EOF-03, “Corporate Action for an Unusual Event,” Revision Z
EP-EOF-04, “Corporate Action for an Alert or Higher,” Revision AF
EP-EOF-08, “Continuous Emergency Notifications,” Revision R
EP-TSC-1, “TSC Organization and Responsibilities,” Revision O
EP-TSC-2, “TSC Activation,” Revision P
EPIP-AD-03, “KNPP Response to an Unusual Event,” Revision AA
EPIP-AD-04, “KNPP Response to an Alert or Higher,” Revision AB
EPIP-AD-07, “Initial Emergency Notifications,” Revision AK
EPIP-APPX-A-2, “Response Personnel Call List,” Revisions BG
EPMP 2.6, “EP Measures,” Revision B
EPMP 2.7, “EP Work Flow Management, ”Revision A
EPMP 9.01, “Radio Pager Testing,” Revision H