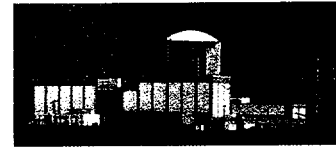




Kewaunee Nuclear Power Plant
N490, State Highway 42
Kewaunee, WI 54216-9511
920-388-2560



Operated by
Nuclear Management Company, LLC

September 21, 2001

10CFR50.55a

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

Ladies/Gentlemen:

DOCKET NO 50-305
OPERATING LICENSE DPR-43
KEWAUNEE NUCLEAR POWER PLANT
INSERVICE TESTING PROGRAM IMPROVEMENT PROJECT

This letter provides you information regarding a design bases review of the Inservice Testing Program at the Kewaunee Nuclear Power Plant (KNPP). Quality Assurance audits and NRC inspections have identified potential weaknesses and areas for improvement in Kewaunee's program. In response to these findings, KNPP is undertaking an effort to review and improve program scope, bases documentation, and administrative and implementing procedures.

The attachment to this letter identifies the scope of the project, the method of dispositioning discrepancies, and the expected schedule for project completion. Following revision of the program, a submittal will be made to the NRC transmitting the revised program as well as a summary of any major changes.

If you have any questions or require additional information, please contact Kevin Hujet at (920) 388-8332.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle A. Hoops". The signature is fluid and cursive.

Kyle A. Hoops
Manager-Kewaunee Plant

KPH

Attachment

cc- US NRC-Region III
NRC Senior Resident Inspector

A047

INSERVICE TESTING IMPROVEMENT PROJECT

SCOPE

The Inservice Testing (IST) Bases Document and the IST Program Plan will be reviewed to verify that the program scope complies with ASME OM Code requirements (OMa-1988, Parts 6 and 10 and OM-1987, Part 1), 10CFR50.55a, Technical Specifications, NRC commitments, and regulatory guidance. Revisions shall be made to the bases document and program plan as necessary. The revised IST Program Plan will be submitted to the NRC for review in accordance with the requirements of 10CFR50.55a and the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications.

DISPOSITIONING AND RESOLUTION OF DISCREPANCIES

Discrepancies identified during the course of this project will be dispositioned in accordance with Kewaunee's corrective action program, the Kewaunee Assessment Process (KAP). As delineated in Kewaunee's General Nuclear Procedure (GNP) 11.08.01, a KAP will be initiated when a discrepancy is identified or an issue has the potential to adversely affect nuclear safety, system/component operability, or nonconformance with regulatory requirements or commitments is identified. 10CFR50.55a and KNPP Technical Specification 4.2 require that ASME Code Class 1, 2, and 3 components within the scope of Section XI of the ASME Boiler and Pressure Vessel Code be tested to the requirements specified therein. Therefore, failure to do so represents a nonconforming condition.

This effort will be a comprehensive review conducted by outside, independent expertise. Due to its comprehensive nature, the potential exists to identify components or component functions that should have been included in Kewaunee's IST Plan, but have not. If this situation occurs, it will not be considered a missed surveillance in accordance with KNPP Technical Specification 4.0.c, which would require the component to be tested within 24 hours. However, in accordance with NUREG-1482 and Generic Letter (GL) 91-18, it will be considered a nonconforming condition requiring an operability determination. Upon identification of a nonconforming condition, the following actions will be taken:

1. A KAP will be initiated in accordance with GNP 11.8.1.
2. An operability determination will be performed. If there is not a reasonable confidence in the component's operability, it will be declared inoperable and the applicable Technical Specification limiting condition for operation will be applied.
3. If the component is determined to be operable, actions will be initiated to develop and schedule required testing to return the component to full compliance.

PROJECT SCHEDULE

The schedule and milestones for completion of all tasks within the scope of this project are outlined below. This schedule could change based on the number and magnitude of the issues identified during the review. Corrective actions identified during the assessment process will be scheduled for completion based on the significance of the item.

Anticipated Schedule	
Program Scope, Bases Document revision, Plan revision	9/4/01-6/3/02
Resolve identified discrepancies	9/4/01-12/2/02
Procedure review/revision	1/2/02-12/2/02
Identified Quarterly Testing	Completed by 12/2/02
Identified CSD/RSD Testing	Completed prior to completion of Spring 2003 Refueling Outage

Due to the resources required to develop and review procedures, testing identified as quarterly will be performed within two normally scheduled surveillances for the respective system, i.e. a maximum of six months from time of identification, although effort will be made to complete the testing at the first available time. Refueling and cold shutdown tests will be developed in anticipation of the Spring 2003 refueling outage and testing will be completed prior to resumption of power generation following refueling.

The guidelines used during the development of KNPP's improvement project comply with the recommendations provided in Section 7.2 of NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants".