



Kewaunee Nuclear Power Plant
Operated by Nuclear Management Company, LLC

January 17, 2005

NRC-05-004
10 CFR 50.73

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

Kewaunee Nuclear Power Plant
Docket 50-305
License No. DPR-43

Reportable Occurrence 2004-004-00

In accordance with the requirements of 10 CFR 50.73, "Licensee Event Report System," Licensee Event Report (LER) for reportable occurrence 2004-004-00 is being submitted.

This letter contains no new commitments and no revisions to existing commitments.

Thomas Coutu
Site Vice-President, Kewaunee Nuclear Power Plant
Nuclear Management Company, LLC

Enclosure (1)

cc: Administrator, Region III, USNRC
Senior Resident Inspector, Kewaunee, USNRC
INPO Records Center

ENCLOSURE 1
LICENSEE EVENT REPORT (LER)

3 pages follow

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0066), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

FACILITY NAME (1) Kewaunee Nuclear Power Plant	DOCKET NUMBER (2) 05000305	PAGE (3) 1 of 3
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TITLE (4)
Procedural Deficiency Results in Automatic Containment Ventilation Isolation Being Disabled Contrary to Technical Specifications

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
11	18	2004	2004	-- 004 --	00	01	17	2005	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		N		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 3: (Check all that apply) (11)						
POWER LEVEL (10)		000		20.2201(b)		20.2203(a)(3)(ii)		50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)
				20.2201(d)		20.2203(a)(4)		50.73(a)(2)(iii)		50.73(a)(2)(x)
				20.2203(a)(1)		50.36(c)(1)(i)(A)		50.73(a)(2)(iv)(A)		73.71(a)(4)
				20.2203(a)(2)(i)		50.36(c)(1)(ii)(A)		50.73(a)(2)(v)(A)		73.71(a)(5)
				20.2203(a)(2)(ii)		50.36(c)(2)		50.73(a)(2)(v)(B)		OTHER Specify in Abstract below or in NRC Form 366A
				20.2203(a)(2)(iii)		50.46(a)(3)(ii)		50.73(a)(2)(v)(C)		
				20.2203(a)(2)(iv)		50.73(a)(2)(i)(A)		50.73(a)(2)(v)(D)		
				20.2203(a)(2)(v)	X	50.73(a)(2)(i)(B)		50.73(a)(2)(vii)		
				20.2203(a)(2)(vi)		50.73(a)(2)(i)(C)		50.73(a)(2)(viii)(A)		
				20.2203(a)(3)(i)		50.73(a)(2)(ii)(A)		50.73(a)(2)(viii)(B)		

LICENSEE CONTACT FOR THIS LER (12)

NAME Mary Jo Merholz - Licensing	TELEPHONE NUMBER (Include Area Code) (920) 388-8277
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT

On November 18, 2004 at approximately 1630 hours during Kewaunee Nuclear Power Plant (KNPP) refueling shutdown (KR27), control room personnel were performing a refueling checklist and discovered that R-12 (Containment Radiation Monitor) would not automatically isolate Reactor Building Ventilation. Further investigation revealed that performance of Surveillance Procedure SP-55-155C, "Engineered Safeguards Features Prestartup Logic Test," had been initiated at 0750 hours. SP-55-155C placed the Safeguards Train A into test mode at 0803 hours and Safeguards Train B into test mode at 0804 hours, thereby defeating Safeguards Train A and Train B automatic signals to containment ventilation isolation. Technical Specifications TS 3.8.a.8 requires that automatic containment ventilation isolation be operable during refueling operations. When this event was discovered, no reactivity manipulations were occurring and further manipulations were restricted until automatic containment ventilation isolation capability could be restored.

The cause of the event was attributed to a lack of adequate guidance in SP-55-155C. In the Operational Consideration section of this procedure, affected Technical Specification TS 3.8.a.8 was not listed. Additionally, the Initial Conditions section of the procedure did not delineate that this procedure could not be performed when refueling containment integrity was required.

Procedure changes have been initiated to revise SP-55-155C. In addition, a corrective action has been initiated to ensure that performance of SP-55-155C is properly coordinated with Refueling Containment Integrity requirements.

The safety significance of this event was minimal. Radiation Monitors R-12 and R-21 continued to provide indication of radiation levels in the containment atmosphere. Both Radiation Monitors would have alarmed in the control room had an event occurred which required an automatic containment ventilation isolation. Manual isolation of containment ventilation remained available at all times. This event is not a safety system functional failure.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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Kewaunee Nuclear Power Plant	05000305	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 of 3
		2004	-- 004 --	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

DESCRIPTION

On November 18, 2004 at approximately 1630 hours during Kewaunee Nuclear Power Plant (KNPP) refueling shutdown (KR27), control room personnel were performing a refueling checklist and discovered that R-12 (Containment Radiation Monitor) [MON] would not automatically isolate Reactor Building Ventilation [VA]. Further investigation revealed that performance of Surveillance Procedure, SP-55-155C, "Engineered Safeguards [JE] Features Prestartup Logic Test", had been initiated at 0750 hours. SP-55-155C placed the Safeguards Train A into test mode at 0803 hours and Safeguards Train B into test mode at 0804 hours, thereby defeating Safeguards Train A and Train B automatic signals to containment ventilation isolation. During the time that both safeguards trains were out of service, the upper internals were installed in the reactor [RCT] and control rod [ROD] latching had been completed. Technical Specifications TS 3.8.a.8 requires that automatic containment ventilation isolation is operable during refueling operations. When this event was discovered, no reactivity manipulations were occurring and further manipulations were restricted until automatic containment ventilation isolation capability could be restored.

CAUSE OF THE EVENT

The cause of the event was attributed to a lack of adequate procedure guidance. In the Operational Consideration section of SP 55-155C, affected Technical Specifications TS 3.8.a.8 was not listed. Additionally, the Initial Conditions section did not delineate that this procedure should not be performed when refueling containment integrity was required. However, in the General Instructions section, Step 4.1.2, Containment Isolation and Containment Vent Isolation were listed as equipment affected by this procedure. The lack of information in the Initial Conditions along with Technical Specification TS 3.8.a.8 not being listed led to the occurrence of this event. Contributing factors to the event were that the procedure was not properly coordinated with Refueling Containment Integrity requirements to prevent this occurrence. Additionally, when the Senior Reactor Operator authorized the work in the control room, he did not recognize how the procedure affected Technical Specifications compliance.

ANALYSIS OF THE EVENT

This event is being reported under 10CFR50.73(a)(2)(i)(B), operation that was prohibited by Technical Specifications. This event does not involve any equipment failures.

The safety significance of this event was minimal. While the upper internals were being installed and when control rod latching was occurring, Radiation Monitors R-12 and R-21 continued to provide indication of radiation levels in the containment atmosphere. The monitors would have alarmed in the control room had a fuel handling radiological event occurred.

Upon receipt of an R-12 or R-21 alarm in the control room, the abnormal operating procedure for the Radiation Monitoring system directs operator actions to isolate containment ventilation. Manual isolation of containment ventilation was available at all times, and the manual operator actions allow for prompt isolation of containment ventilation.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

CORRECTIVE ACTIONS

1. Procedure changes have been initiated to revise procedure SP-55-155C. The changes include enhancements to the initial conditions and operational considerations sections along with the addition of a sign-off step stating that this procedure cannot be performed if Refueling Containment Integrity is required.
2. A corrective action has been initiated to ensure that performance of SP-55-155C is properly coordinated with Refueling Containment Integrity requirements.

SIMILAR EVENTS

None.