Dominion Energy Kewaunee, Inc.
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AUG 18 2005

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

Serial No. 05-547
KPS/LIC/GR: RO
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
LICENSEE EVENT REPORT LER 2005-011-00

Dear Sirs:

Pursuant to 10 CFR 50.73, Dominion Energy Kewaunee, Inc., hereby submits the following Licensee Event Report applicable to Kewaunee Power Station.

Report No. 50-305/LER 2005-011-00

This report has been reviewed by the Plant Operating Review Committee and will be forwarded to the Management Safety Review Committee for its review.

If you have any further questions, please contact Jerry Riste at (920) 388-8424.

Very truly yours,

Michael G. Gaffney
Site Vice President, Kewaunee Power Station

Attachment

Commitments made by this letter: NONE

IE22

cc: Mr. J. L. Caldwell
Administrator Region III
U.S. Nuclear Regulatory Commission
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Mr. J. F. Stang
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Mr. S. C. Burton
NRC Senior Resident Inspector
Kewaunee Power Station

NRC FORM 366 (6-2004) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104 EXPIRES 6-30-2007

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.

LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Kewaunee Power Station	05000305	1 of 3

TITLE (4)

The Setting of a Permissive (P-10) in the Power Range Channels of the Nuclear Instrumentation System Was Outside of Plant Technical Specification Requirements

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
6	20	2005	2005	-- 011 --	00	8	18	2005	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	N
POWER LEVEL (10)	000

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR : (Check all that apply) (11)

	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	TELEPHONE NUMBER (Include Area Code)
Gerald Riste - Licensing	(920) 388-8424

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

ABSTRACT

On June 20, 2005, with the station in refueling shutdown mode, it was determined that the setting for Permissive P-10 did not match the Technical Specification (TS) requirement of TS Table TS 3.5-2. An initial investigation into the cause of this event identified that the station Technical Specification is not aligned with the basis for the reactor protection permissive. On June 20, 2005 a Reactor Protection System Engineer questioned the station setting for P-10 compared to the TS requirements. The subsequent review determined that the station setting and the TS did not match. Corrective actions completed include revising the settings of P-10 to match the requirements of Table TS 3.5-2 and an evaluation of the past acceptability and effect of P-10 not meeting TS requirements. Corrective actions to be completed include revising the Nuclear Power Range Channel Calibration surveillance procedures for the current P-10 set/reset values and revising the training material to refer to the current P-10 settings.

This occurrence is deemed to have no safety significance and does not constitute a safety system functional failure.

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

Event Description:

On June 20, 2005, with the station in refueling shutdown mode, it was determined that the setting for Permissive P-10 did not match the Technical Specification requirement. P-10 is a permissive in the power range channels of the Nuclear Instrumentation (NI) System [IG]. The Nuclear Power Range Channel [JI] Calibration surveillance procedures directed the P-10 setting [JD] to be 9.5% +/- 0.5% of reactor power with a reset of 7.5% +/- 0.5% reactor power. Table TS 3.5-2 of the Technical Specification listed the permissible bypass condition as 2 of 4 Power Range Nuclear Instrument Channels greater than P-10 (10% reactor power). Consequently, for greater than the past three years, station Technical Specification 3.5 has not been met because the setting for P-10 has not matched the requirement of Table TS 3.5-2.

Event Analysis:

While investigating an unexpected condition on a nuclear power range instrumentation drawer, engineering personnel noted that the setting for permissive P-10 was 9.5% +/- 0.5% reactor power. Table TS 3.5-2 of the Technical Specification lists the required P-10 setting as greater than 10% reactor power.

There are four independent channels of power range instrumentation in the NI System. P-10 is a permissive in the power range channels that functions as follows: When two-out-of-four power range channels are above the P-10 permissive setting, the operator may manually block the power range high neutron flux reactor trip (low setting), the intermediate range high neutron flux reactor trip, and the intermediate range rod stop. Additionally, the source range high neutron flux reactor trip is automatically blocked. When three-out-of four power range channels are below the P-10 permissive reset, the power range high neutron flux reactor trip (low setting), the intermediate range high neutron flux reactor trip, and the intermediate range rod stop are automatically reinstated. The source range high neutron flux reactor trip block is also removed .

P-10 interacts with two other permissives, P-7 and P-13. P-7 (defined in Technical Specification Table TS 3.5-2) combines input from power range channels and turbine impulse pressure channels to block various reactor trips at low reactor power (e.g., low pressurizer pressure, pressurizer high water level, reactor coolant pump breakers open, reactor coolant system low flow in both loops). Thus, P-10 provides an input to the P-7 development. P-13 (which is not mentioned in the Technical Specification) has no direct blocking functions but uses turbine first stage impulse pressure as an input to P-7.

A review of past surveillance procedures, which verified and adjusted the setting for P-10, revealed that the setting has not changed since April of 1974. An evaluation was performed to determine the significance of having the P-10 setting at 9.5% reactor power and the reset at 7.5% reactor power. It was determined that the setting at 9.5% reactor power did not meet the requirements of Table TS 3.5-2 in that the TS specifically says greater than10%. The evaluation of having the reset at 7.5% reactor power included a review of the accident analyses in Chapter 14 of the Updated Safety Analysis Report. The only accident that has a low initial power level starting point between 8% and 10% is the Uncontrolled Rod Control Cluster Assembly (RCCA) Withdrawal At Power. Westinghouse was requested to review this analysis since they are the holder of all the design basis analyses in Chapter 14. Westinghouse concluded that the Reactor Coolant System pressure transient for the limiting condition of 7.5% initial reactor power would result in a peak pressure well below the overpressure limit of 2750 psia. A sensitivity analysis on the effect of initial reactor power for case of 8% resulted in a margin of greater than 100 psi below this overpressure limit.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

This event is being reported under 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by station TS. There was no safety system function failure involved in this event.

Safety Significance:

There were no actual nuclear or radiation exposure consequences from this event. It was determined that this event did not affect the probabilistic risk assessment (PRA) model for the site. The only accident in the Updated Safety Analysis Report (USAR) that has a 10% power starting point is an Uncontrolled RCCA Withdrawal At Power. Review of the USAR Section 14 analyses and discussions with Westinghouse indicated that the safety analysis was not adversely affected by having the P-10 setting at 9.5% reactor power and the reset at 7.5% reactor power.

Cause:

An initial investigation into the cause of this event identified that the station Technical Specification is not aligned with the basis for the reactor protection permissive. This led to a lack of understanding of the TS requirements compared to the understanding of the basis for those requirements.

Corrective Actions:

Corrective Actions Completed:

1. Permissive P-10 was revised to have a setting at 12.0% +/- 0.5% reactor power and a reset at 10.5% +0.5%, -0.0% reactor power. This new set/reset brought P-10 into conformance with Table TS 3.5-2. The corrective action was completed on June 30, 2005.

2. An evaluation of the past acceptability and effect of having P-10 set at 9.5% +/- 0.5% reactor power and reset at 7.5% +/- 0.5% reactor power was completed on June 29, 2005.

Corrective Actions to be Completed:

1. Revise the Nuclear Power Range Channel Calibration surveillance procedures for the revised P-10 set/reset values.

2. Revise the training material that refers to P-10 settings to refer to the current settings.

3. Align the Technical Specification with the model of the Westinghouse Standard Technical Specification for the P-10 permissive.

4. Revise the Technical Specification Basis sections to ensure all licensing basis functions of the P-10 permissive are clearly described.

Similar Events:

None