



November 14, 2005

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

Serial No. 05-762  
KPS/LIC/RR: R4  
Docket No. 50-305  
License No. DPR-43

**DOMINION ENERGY KEWAUNEE, INC.**  
**KEWAUNEE POWER STATION**  
**UPDATE ON IMPROVEMENT INITIATIVES**

This letter provides a status of the improvement initiative commitments that were initially defined in a letter dated March 18, 2005 (Letter No. NRC-05-035) entitled, "Kewaunee Improvement Initiatives – Commitments." These commitments were subsequently endorsed and adopted with clarifications by Dominion Energy Kewaunee, Inc. in a letter from E. S. Grecheck to the NRC dated September 15, 2005 (Serial No. 05-447) entitled, "Endorsement and Adoption of Licensing Actions."

Kewaunee Power Station (KPS) has conducted several self assessments of performance since being acquired by Dominion. As a result, new commitments have been added to the improvement initiatives in Attachment 1. In addition to identifying the status of current commitments, it has also been reformatted. Attachment 2 provides a summary of the commitment additions and administrative clarifications to the previously submitted listing.

The Kewaunee management team remains committed to sustaining improved station performance. We believe that these new and revised commitments will further strengthen the continuing performance improvement at Kewaunee.

This letter supersedes previous commitment letters regarding Kewaunee Improvement Initiatives.

If you have questions or require additional information, please feel free to contact Mr. Tom Breene at 920-388-8599.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W R Matthews".

Mr. William R. Matthews  
Sr. Vice President, Nuclear Operations

Attachments (2)

Commitments made by this letter: As identified in Attachment 1.

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**Attachment 1**

**Serial No. 05-762**

**Update on Improvement Initiatives**

**Dominion Energy Kewaunee, Inc.  
Kewaunee Power Station**

Attachment 1  
 Improvement Initiatives

<b>FOCUS AREA: Operations Leadership</b>				
<b>Title: Improve Conduct of Operations and Operational Leadership</b>				
<b>Item 1</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
1.a	Implement NMC Fleet Operations Mentoring Program to improve Conduct of Operations.	To provide an immediate improvement in the Conduct of Operations, experienced SRO License holders from the NMC fleet have been temporarily placed on shift with the Kewaunee Operations crews to provide mentoring and feedback.	• Fleet NOS observations.	Complete
			• Documented feedback from mentors.	Complete
			• Conduct a follow-up assessment for an effectiveness review 3Q05.	Complete

Item 1 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
1.b	Raise standards of performance within Operations.	This objective will be achieved by: <ol style="list-style-type: none"> <li>1. conducting a gap analysis between current conduct of Operations and industry best practices,</li> <li>2. improving annunciator response expectations,</li> <li>3. improving turnover and pre-shift brief expectations, and</li> <li>4. improving log keeping expectations and "operator at the controls" expectations.</li> </ol>	<ul style="list-style-type: none"> <li>• Revised Conduct of Operations Procedure issued.</li> </ul>	Complete
		<ol style="list-style-type: none"> <li>5. Implement Check Operator Program to provide feedback on standard adherence.</li> </ol>	<ul style="list-style-type: none"> <li>• Assess as part of mentor follow-up effectiveness review 3Q05.</li> </ul>	Complete
		<ol style="list-style-type: none"> <li>6. Implement Dominion Nuclear Operations Standards (DNOS).</li> </ol>	<ul style="list-style-type: none"> <li>▪ Check Operator Program implemented.</li> </ul>	4Q05
		<ul style="list-style-type: none"> <li>▪ DNOS approved and issued.</li> </ul>	4Q06	
1.c	Improve understanding of what an Operations - led organization looks like.	To gain a broader perspective and improved understanding of what an Operations - led organization is, all Shift Managers will participate in a benchmarking trip to plants recommended by INPO or other industry groups.	<ul style="list-style-type: none"> <li>• Trip reports documenting benchmarking trip results, including improvement actions.</li> </ul>	Complete

<b>Item 1 (Cont'd)</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
1.d	Improve Operations training.	To improve performance of the Operations Department, experienced personnel from INPO and the NMC fleet have been temporarily placed with Kewaunee Operations Training staff. This will provide an immediate improvement in the conduct of Operations Training, recognizing that additional actions will be initiated based on the scheduled self-assessment.	<ul style="list-style-type: none"> <li>• Documented feedback from mentors.</li> </ul>	Complete
			<ul style="list-style-type: none"> <li>• Self-assessment of the Operations Training Programs. The self-assessment will include industry peers.</li> </ul>	Complete

Item 1 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
1.e	Improve the effectiveness of operational decision making.	The Kewaunee Operational Decision Making procedure will be upgraded to align with a more effective operational decision making model, based on industry practices. Appropriate training and/or briefing will be conducted upon implementation.	<ul style="list-style-type: none"> <li>Effectiveness review of original procedure.</li> </ul>	Complete
			<ul style="list-style-type: none"> <li>Operational Decision Making Procedure revision issued.</li> </ul>	Complete
			<ul style="list-style-type: none"> <li>Training/briefing attendance records.</li> </ul>	1Q06
			<ul style="list-style-type: none"> <li>Effectiveness review.</li> </ul>	1Q06
1.f	Improve the understanding of License Requirements at KPS.	Develop a training instrument to increase understanding of Technical Specifications.	<ul style="list-style-type: none"> <li>Developed training.</li> </ul>	1Q06
		Conduct training.	<ul style="list-style-type: none"> <li>Training attendance records.</li> </ul>	3Q06
		Perform effectiveness review.	<ul style="list-style-type: none"> <li>Effectiveness review completed.</li> </ul>	4Q06

Item 1 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
1.g	Improve Operations procedures	1. Implement Westinghouse Owners Group (WOG) Revision 2 into Kewaunee Power Station Integrated Plant Emergency Operating Procedures (IPEOP).		
		<ul style="list-style-type: none"> <li>▪ Draft IPEOP based on WOG Emergency Response Guideline Revision 2.</li> </ul>	<ul style="list-style-type: none"> <li>• Revision drafted.</li> </ul>	2Q06
		<ul style="list-style-type: none"> <li>▪ Validate revised procedures.</li> </ul>	<ul style="list-style-type: none"> <li>• Procedures validated.</li> </ul>	3Q06
		<ul style="list-style-type: none"> <li>▪ Incorporate comments and approve procedures.</li> </ul>	<ul style="list-style-type: none"> <li>• Procedures approved.</li> </ul>	4Q06
		<ul style="list-style-type: none"> <li>▪ Train on and implement EOP.</li> </ul>	<ul style="list-style-type: none"> <li>• Training attendance records.</li> </ul>	1Q07
		2. Implement Dual Column Format Abnormal Procedures		
		<ul style="list-style-type: none"> <li>▪ Benchmark other Dominion and Industry sites for lists of typical EOP/AOPs (non-IPEOP).</li> </ul>	<ul style="list-style-type: none"> <li>• Benchmarking documented.</li> </ul>	2Q06
		<ul style="list-style-type: none"> <li>▪ Establish a list of KPS EOP/AOPs.</li> </ul>	<ul style="list-style-type: none"> <li>▪ List published.</li> </ul>	2Q06
<ul style="list-style-type: none"> <li>▪ Establish a Work-off curve to revise the listed KPS EOP/AOPs into 2-column format.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Work-off curve established.</li> </ul>	2Q06		



<b>Item 1 (Cont'd)</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
1.h	Improve Non-Licensed Operator Continuing training program	Revise the Nuclear Auxiliary Operator Training Program Description to improve the focus on systems.	<ul style="list-style-type: none"> <li>▪ Program revised.</li> </ul>	4Q05
		Develop, review, and approve the 2006-2007 Non-Licensed Operator continuing Two-Year Training Plan.	<ul style="list-style-type: none"> <li>▪ Develop, review and approve plan.</li> </ul>	4Q05
		Perform effectiveness review.	<ul style="list-style-type: none"> <li>▪ Effectiveness review completed.</li> </ul>	2Q06

<b>Title: Operability Determinations</b>				
<b>Item 2</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
2.a	Improve the quality of Operability Determinations.	Combined Engineering and Operations training on Operability Determinations and Recommendations has been conducted. The audience for this training was and will be Shift Managers, Shift Technical Advisors, and those Engineers qualified to perform Operability Recommendations.	• Training attendance records.	Complete
			• Effectiveness review.	4Q05
2.b	Validate the quality of existing open Operability Determinations.	To confirm quality and applicability of the operability determinations for all Operable but Degraded and Operable but Non-conforming conditions, an independent review of the associated operability recommendations will be completed. This review will encompass those which will remain open following startup from the spring 2005 forced outage.	• Documented summary of reviews.	Complete
			• PORC concurrence of open operability determinations.	Complete

<b>FOCUS AREA: Configuration Management</b>				
<b>Title: Extent of Condition Reviews</b>				
<b>Item 3</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
3.a	Confirm prior NRC commitments have been implemented as required.	A representative sample of existing commitments will be performed to confirm the implementation of prior commitments that Kewaunee has made to the NRC.	<ul style="list-style-type: none"> <li>Documented assessment results.</li> </ul>	Complete
3.b	Confirm assumptions made in critical engineering calculations that require operator actions to be performed within specific times, reflect actual operator response times.	A validation will be performed of all time critical operator actions assumed in engineering calculations for the top 19 high risk / low margin components prior to startup from the current outage.	<ul style="list-style-type: none"> <li>Documented assessment results of top 19 components prior to startup from the current outage.</li> </ul>	Complete
		The balance of the top 50 high-risk components will be completed by 4Q05.	<ul style="list-style-type: none"> <li>Documented assessment results of top 50 components.</li> </ul>	4Q05

Item 3 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
3.c	Provide reasonable assurance of design basis compliance for high-energy line breaks, tornados, flooding, and seismic events.	<p>Assessments and plant walk downs are being conducted to identify significant issues with high-energy line break, tornados, seismic and flooding. The walk downs are designed to identify:</p> <ol style="list-style-type: none"> <li>1. potential vulnerabilities to pipe whip, and/or postulated concurrent equipment failures, and</li> <li>2. potential component or structural failures that could impact the operability of safety-related equipment.</li> </ol>	<ul style="list-style-type: none"> <li>• Documented walk down results.</li> </ul>	Complete

<b>Title: Auxiliary Feedwater &amp; Flooding Modifications</b>				
<b>Item 4</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
4.a	Resolve auxiliary feedwater system operability concerns due to loss of suction from the Condensate System.	Modifications will be implemented to restore operability of the auxiliary feedwater system. The scope of the modification will include re-routing of the auxiliary feedwater pump suction piping, and installation of a low suction pressure trip function.	<ul style="list-style-type: none"> <li>Modification documents.</li> </ul>	Complete
4.b	Address the turbine building flooding concerns.	Modification and repairs will be completed to address the turbine building internal flooding issue.	<ul style="list-style-type: none"> <li>Modification documents.</li> </ul>	Complete
4.c	Reduce potential for residual heat removal pump pit flooding during shutdown.	Implement modification to reduce flooding potential for RHR pump pits.	<ul style="list-style-type: none"> <li>Approved design description, approved 10 CFR 50.59, completed work order.</li> </ul>	3Q06
4.d	Submit flooding licensing basis.	Submit flooding license amendment request.	<ul style="list-style-type: none"> <li>LAR submitted.</li> </ul>	1Q06
4.e	Resolve auxiliary feedwater local operator actions.	The auxiliary feedwater system local manual operator actions as described in the license amendment request submitted May 5, 2005, and supplemented on June 9, 2005 will be eliminated.	<ul style="list-style-type: none"> <li>Local operator actions eliminated.</li> </ul>	No later than completion of Kewaunee refueling outage R-29
4.f	Update PRA Model.	Incorporate turbine building flood modifications and operations procedure changes.	<ul style="list-style-type: none"> <li>PRA Notebook issued.</li> </ul>	1Q06

<b>Title: Design Basis Documentation &amp; Validation</b>				
<b>Item 5</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
5.a	Validate and improve documentation of the design basis for:  1. Internal Flooding, 2. High Energy Line Breaks, 3. Station Blackout, 4. Tornados, and 5. Seismic Events	A project plan will be developed and implemented to complete design basis topical reports.	<ul style="list-style-type: none"> <li>Internal flooding topical report completed.</li> </ul>	4Q05
			<ul style="list-style-type: none"> <li>High-energy line break topical report completed.</li> </ul>	4Q05
			<ul style="list-style-type: none"> <li>Station blackout topical report completed.</li> </ul>	2Q06
			<ul style="list-style-type: none"> <li>Tornado topical report completed.</li> </ul>	3Q06
			<ul style="list-style-type: none"> <li>Seismic topical report completed.</li> </ul>	4Q06

Item 5 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
5.b	Complete documentation and validation of the license bases for the safety functions of the most risk significant safety systems.	A project plan will be developed and implemented for the documentation and field validation of license bases for the safety functions of the Auxiliary Feedwater System, Service Water System, Residual Heat Removal System, Component Cooling Water System, and Emergency Diesel Generators, 4kV electrical system and DC electrical system.	• AFW System completed.	1Q06
			• SW System completed.	2Q06
			• Interim project progress review.	3Q06
			• RHR System completed.	3Q06
			• CCW System completed.	4Q06
			• EDG completed.	1Q07
			• 4kV System completed.	2Q07
			• DC System completed.	4Q07

Item 5 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
5.c	Improve retrievability and control of calculations of record.	<p>The following will be completed:</p> <ol style="list-style-type: none"> <li>1. Complete populating the current safety related calculations into the calculation database, and</li> <li>2. Incorporating cross-reference information of inputs/outputs between calculations.</li> </ol>	<ul style="list-style-type: none"> <li>• Electronic database population complete.</li> </ul>	1Q06
			<ul style="list-style-type: none"> <li>• Cross-referencing between calculations in database complete.</li> </ul>	1Q06
			<ul style="list-style-type: none"> <li>• Effectiveness review.</li> </ul>	2Q06
5.d	Updating of Environmental Qualification (EQ) Program.	Conduct a validation assessment of a sample of completed EQ program documents for adequacy in incorporating design basis information and assess prioritization of update plan.	<ul style="list-style-type: none"> <li>• Perform assessment of completed file upgrades and plan.</li> </ul>	2Q06



<b>Title: Electrical Calculations</b>				
<b>Item 6</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
6.a	Complete AC electrical models and calculations to provide clear bases for safety related settings and loads.	Complete AC electrical calculations for: <ol style="list-style-type: none"> <li>1. load flow,</li> <li>2. short-circuit currents,</li> <li>3. EDG loading,</li> <li>4. relay setting,</li> <li>5. protection coordination,</li> <li>6. control circuit voltage drops,</li> <li>7. cable ampacity, and</li> <li>8. thermal overload relays.</li> </ol>	<ul style="list-style-type: none"> <li>• Interim project progress review.</li> </ul>	2Q06
			<ul style="list-style-type: none"> <li>• Interim project progress review.</li> </ul>	4Q06
			<ul style="list-style-type: none"> <li>• Calculations completed, validated, and issued.</li> </ul>	1Q07
6.b	Complete DC electrical models and calculations to provide clear bases for safety related settings and loads.	Complete DC electrical calculations for: <ol style="list-style-type: none"> <li>1. battery sizing,</li> <li>2. charger sizing,</li> <li>3. voltage drop,</li> <li>4. short-circuit currents,</li> <li>5. control circuit voltage drops, and</li> <li>6. breaker and fuse coordination.</li> </ol>	<ul style="list-style-type: none"> <li>• Interim project progress review.</li> </ul>	4Q06
			<ul style="list-style-type: none"> <li>• Interim project progress review.</li> </ul>	2Q07
			<ul style="list-style-type: none"> <li>• Calculations completed, validated and issued.</li> </ul>	4Q07

<b>FOCUS AREA: Engineering Effectiveness</b>				
<b>Title: Engineering Organizational Effectiveness</b>				
<b>Item 7</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
7.a	Improve the quality of Engineering products.	<ul style="list-style-type: none"> <li>An assessment of engineering has been conducted using NMC fleet and external expertise to identify the key areas for improvement and to develop associated action plans.</li> </ul>	<ul style="list-style-type: none"> <li>Completed assessment report.</li> </ul>	Complete
		<ul style="list-style-type: none"> <li>To improve the quality of Engineering products, an interim Independent Review Group (IRG) has been established to provide an in-line independent review of engineering products, including:               <ol style="list-style-type: none"> <li>Operability Recommendations,</li> <li>10 CFR 50.59 evaluations,</li> <li>calculations important to safety, and</li> <li>modifications important to safety.</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>IRG implemented.</li> </ul>	Complete
		<ul style="list-style-type: none"> <li>Training will be conducted to reinforce expectations regarding Engineering product quality.</li> </ul>	<ul style="list-style-type: none"> <li>Engineering quality effectiveness review.</li> </ul>	4Q05
		<ul style="list-style-type: none"> <li>Training will be conducted to reinforce expectations regarding Engineering product quality.</li> </ul>	<ul style="list-style-type: none"> <li>Training attendance records.</li> </ul>	Complete

Item 7 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
7.b	Improve Engineering knowledge and understanding of design and licensing bases.	Training will be conducted on design and licensing bases for Engineering personnel.	<ul style="list-style-type: none"> <li>• Training attendance records.</li> </ul>	Complete
			<ul style="list-style-type: none"> <li>• Effectiveness review.</li> </ul>	2Q06
7.c	Improve the interface between Operations, Maintenance, and Engineering.	Roles and responsibilities for Operations, Maintenance, and Engineering as they relate to Engineering support will be examined and re-defined as necessary.	<ul style="list-style-type: none"> <li>• Roles and responsibilities documented.</li> </ul>	Complete
			<ul style="list-style-type: none"> <li>• Effectiveness review.</li> </ul>	4Q05
7.d	Improve Station Engineering Support.	Establish System Engineering.	<ul style="list-style-type: none"> <li>• Dominion Assist Visit.</li> </ul>	4Q05
			<ul style="list-style-type: none"> <li>• Implement Dominion Plant Health Reports.</li> </ul>	1Q06
7.e	Improve Equipment Reliability.	Establish a Station Equipment Reliability Team (SERT) and Station Equipment Reliability Issues List (SERIL).	<ul style="list-style-type: none"> <li>• Team established.</li> </ul>	1Q06
			<ul style="list-style-type: none"> <li>• List developed.</li> </ul>	1Q06

<b>FOCUS AREA: Corrective Action Program Effectiveness</b>				
<b>Title: Initiation &amp; Screening Effectiveness</b>				
<b>Item 8</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
8.a	Ensure station personnel are aware of their roles and responsibilities in the Corrective Action Program (CAP).	Actions will be taken to ensure that station personnel are aware of their roles and responsibilities as they pertain to the Corrective Action Program.	• Employee briefings completed.	Complete
			• New employee training program revised.	Complete
		Implement a communications campaign to reinforce roles and responsibilities.	• Copies of D-15 and presentation materials.	2Q06
8.b	Validate the appropriateness of the significance level assigned for all currently open conditions adverse to quality in the Corrective Action Program.	An independent review of all open conditions adverse to quality in the Corrective Action Program is being completed.	• Documented results of the assessment.	Complete
8.c	Assure CAP trends are identified and used in the significance and level of effort assigned during CAP screening.	Trend information related to repeat Corrective Action Program items will be provided to the daily Corrective Action Program screen team.	• Generation of adverse trend CAPs.	Complete
			• Effectiveness review.	4Q05

Item 8 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
8.d	Assure that managers recognize the significance of long standing issues.	Training on risk significance will be provided to the management team. This training is also part of the corrective actions to prevent recurrence from the containment equipment hatch close root cause evaluation.	<ul style="list-style-type: none"> <li>• Training attendance records.</li> </ul>	Complete
			<ul style="list-style-type: none"> <li>• Assessments indicate no significant CAP prioritization errors. Goal is to have:               <ul style="list-style-type: none"> <li>▪ No level "A" misclassifications</li> <li>▪ ≥ 90% level "B" issues properly classified.</li> </ul> </li> </ul>	4Q05

<b>Title: CAP Resolution Effectively Addresses Problems</b>				
<b>Item 9</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
9.a	Improve the quality of Apparent Cause Evaluations (ACEs).	The Corrective Action Program screening team will select Apparent Cause Evaluations that will be brought to the Corrective Action Review Board (CARB) for review upon completion. Feedback on the quality and grading will be provided to the authors.	<ul style="list-style-type: none"> <li>Criteria established for ACE reviews to be completed by CARB.</li> </ul>	Complete
			<ul style="list-style-type: none"> <li>Average ACE quality grade is <math>\geq</math> 85 sustained over a 3-month period.</li> </ul>	2Q06
9.b	Determine the effectiveness of the actions taken in 9.a.	Nuclear Oversight (NOS) will review a selected sample of CARB-approved ACEs to determine the effectiveness of the actions taken and determine if the average quality of ACEs has been sustained at $\geq$ 85 over at least 3 months.	<ul style="list-style-type: none"> <li>Nuclear Oversight report documenting results of the reviews.</li> </ul>	4Q05
9.c	Improve the quality of causal evaluations.	Implement Dominion Nuclear Administrative Procedure (DNAP) 1604, Dominion Cause Evaluation Program.	<ul style="list-style-type: none"> <li>DNAP approved and issued.</li> </ul>	2Q06
			<ul style="list-style-type: none"> <li>Conduct effectiveness review.</li> </ul>	1Q07

<b>Title: Timeliness of Resolution of Significant Issues</b>				
<b>Item 10</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
10.a	Validate the timeliness for resolution of current open significant issues.	An independent review is being conducted of all open corrective actions from level "A" and "B" action requests to validate the timeliness of resolution for significant issues.	<ul style="list-style-type: none"> <li>Documentation of results from the review.</li> </ul>	Complete
10.b	Assure operable but degraded / non-conforming issues are corrected in a timely manner.	Administrative procedures have been revised to include requirements for timely resolution of operable but degraded / non-conforming issues. As of March 15, 2005, 28 open OBDs remain.	<ul style="list-style-type: none"> <li>Revision to procedure GNP 11.08.01 issued.</li> </ul>	4Q05
			<ul style="list-style-type: none"> <li>March 15, 2005 backlog of open operable but degraded / non-conforming conditions reduced by <math>\geq 50\%</math>.</li> </ul>	4Q05
10.c	Upgrade the KPS Emergency Action Levels (EAL) to the NEI 99-01 EAL scheme as submitted to NRC on October 26, 2004.	Conduct training.	Training completed.	6 months after NRC approval.
		Implement new EALs.	Procedure revised.	6 months after NRC approval.

<b>FOCUS AREA: Manager / Supervisor Effectiveness</b>				
<b>Title: Individual Behavior Excellence</b>				
<b>Item 11</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
11.a	Communicate Kewaunee "Picture of Excellence" to employees to help facilitate sustained performance improvement.	Action steps to meet this objective include communicating and reinforcing the "Picture of Excellence" to improve accountability and individual behaviors. Training for managers and supervisors has begun, and will be completed prior to unit startup.	<ul style="list-style-type: none"> <li>• Training attendance records.</li> </ul>	Complete



Item 11 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
11.b	Provide the necessary infrastructure and tools required to execute and reinforce the "Picture of Excellence".	<p>The implementation steps include:</p> <ul style="list-style-type: none"> <li>• Incorporating ACEMAN into daily Plan Of the Next Day (POND) meetings, and</li> <li>• Implementation of a daily meeting (D-15) between supervisors and individual contributors. The purpose of the D-15 meetings is to improve communication between employees, supervisors and managers. They are designed to enhance the information flow between employees and all levels of management and create an environment for open communication.</li> <li>• Alignment of Performance Management Plans to the "Picture of Excellence"</li> <li>• Establishing monthly Picture of Excellence Review Group (PERG) meetings to foster accountability for implementation of the site Excellence Plans.</li> </ul>	<ul style="list-style-type: none"> <li>• D-15 meetings implemented.</li> </ul>	Complete
			<ul style="list-style-type: none"> <li>• ACEMAN grading employed at POND meetings.</li> </ul>	Complete
			<ul style="list-style-type: none"> <li>• "Picture of Excellence" and ACEMAN incorporated into station Performance Management Plans.</li> </ul>	Complete

Item 11 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
11.c	Build depth in Emergency Response Organization.	Assess staffing needs and qualification in Emergency Preparedness positions.	<ul style="list-style-type: none"> <li>• Assessment report.</li> </ul>	2Q06
		Train additional personnel.	<ul style="list-style-type: none"> <li>• Training attendance records.</li> </ul>	3Q06

<b>Title: Leadership Capabilities</b>				
<b>Item 12</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
12.a	Improve the leadership capability of supervisors in: <ol style="list-style-type: none"> <li>1. Operations</li> <li>2. Operations Training</li> <li>3. Engineering</li> </ol>	A leadership assessment will be conducted for the: <ol style="list-style-type: none"> <li>1. Assistant Operations Managers,</li> <li>2. Shift Managers,</li> <li>3. Control Room Supervisors,</li> <li>4. Operations Instructors,</li> <li>5. Engineering Managers, and</li> <li>6. Engineering Supervisors.</li> </ol> <p>The assessment will focus on leadership capabilities and capacity to implement a continuous improvement culture. Results of the assessments will be factored into individual improvement plans.</p>	<ul style="list-style-type: none"> <li>• Documented results of the assessments.</li> <li>• Individual Performance Management Plans updated with improvement areas.</li> </ul>	Complete

Item 12 (Cont'd)	Objective	Summary of Commitment Steps	Methods to Verify Commitment Met	Commitment Completion Date
12.b	Improve the leadership capability of supervisors in: 1. Maintenance	A leadership assessment will be conducted for: 1. Maintenance Supervision	<ul style="list-style-type: none"> <li>• Documented results of the assessments.</li> <li>• Individual Performance Management Plans updated with improvement areas.</li> </ul>	2Q06
	2. Chemistry	2. Chemistry Supervision		3Q06
	3. Outage and Planning	3. Outage and Planning Supervision		3Q06
	4. Emergency Planning	4. Emergency Planning Supervision		2Q06
	5. Radiation Protection	5. Radiation Protection Supervision		3Q06
12.c	Improve line manager ownership and accountability.	Implement DNAP 0114, Dominion Nuclear Self-Evaluation Program.	<ul style="list-style-type: none"> <li>• DNAP approved and issued.</li> </ul>	4Q05
			<ul style="list-style-type: none"> <li>• Station Self Evaluation Meeting (SSEM) held.</li> </ul>	4Q05

<b>Title: Nuclear Oversight Effectiveness</b>				
<b>Item 13</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
13.a	Improve Nuclear Oversight (NOS) effectiveness.	Implement mentors from other NMC sites for a period of 6 weeks, assign assessors to a functional area, and implement a rotation plan. An improvement plan addressing assessor performance will be developed which will include additional actions.	• Rotation policy in-place.	Complete
			• Assessors assigned to functional areas.	Complete
			• Develop assessor improvement plan.	Complete
			• Review effectiveness of Nuclear Oversight processes.	3Q06
13.b	Strengthen Nuclear Oversight assessment processes.	Implement Dominion Nuclear Oversight model which includes separate Specialist Assessment and Audit Programs.	• Establish and fill specialist positions.	1Q06

<b>Title: Conservative Decision Making</b>				
<b>Item 14</b>	<b>Objective</b>	<b>Summary of Commitment Steps</b>	<b>Methods to Verify Commitment Met</b>	<b>Commitment Completion Date</b>
14.a	Improve understanding of conservative decision making by managers and supervisors.	Site management will conduct training on conservative decision making for managers and supervisors.	• Training attendance records.	Complete

**Attachment 2**

**Serial No. 05-762**

**Summary of New Commitments and  
Administrative Clarifications**

**Dominion Energy Kewaunee, Inc.  
Kewaunee Power Station**

Attachment 2  
Summary of New Commitments and Administrative Clarifications

New commitments have been made in the following areas:

- 1.b Two new Commitment Steps added: to “Implement Check Operator Program to provide feedback on standard adherence” and to “Implement Dominion Nuclear Operations Standards (DNOS).”
- 1.f New Objective to “Improve the understanding of License Requirements at KPS.”
- 1.g New Objective to “Improve Operations procedures.”
- 1.h New Objective to “Improve Non-Licensed Operator Continuing training program.”
- 4.c New Objective to “Reduce potential for residual heat removal pump pit flooding during shutdown.”
- 4.d New Objective to “Submit flooding licensing basis.”
- 4.e New Objective to “Resolve auxiliary feedwater local operator actions.”
- 4.f New Objective to “Update PRA Model.”
- 5.d New Objective to “Updating of Environmental Qualification (EQ) Program.”
- 7.d New Objective to “Improve Station Engineering Support.”
- 7.e New Objective to “Improve Equipment Reliability.”
- 8.a New Commitment Step to “Implement a communications campaign to reinforce roles and responsibilities.”
- 9.c New Objective to “Improve the quality of causal evaluations.”
- 10.c New Objective to “Upgrade the KPS Emergency Action Levels (EAL) to the NEI 99-01 EAL scheme as submitted to NRC on October 26, 2004”.
- 11.c New Objective to “Build depth in Emergency Response Organization”.
- 12.b New Objective to “Improve the leadership capability of supervisors in Maintenance, Chemistry, Outage and Planning, Emergency Planning, and Radiation Protection.”
- 12.c New Objective to “Improve line manager ownership and accountability.”
- 13.b New Objective to “Strengthen Nuclear Oversight assessment processes.”

Clarifications have been made to the table as listed below:

- 1.e A completion date of 1Q06 has been identified for the training/briefing attendance records and an effectiveness review.
- 4 Title changed from “Auxiliary Feedwater & Turbine Building Flooding Modifications” to “Auxiliary Feedwater & Flooding Modifications.”
- 5.b The final completion date has been changed to 4Q07.
- 5.c A completion date of 2Q06 has been identified for the effectiveness review.
- 6.a The interim progress review was clarified and commitment completion dates were added.
- 6.b The interim progress review was clarified and commitment completion dates were added.
- 7.a Added “IRG Implemented” as a Method to Verify the Commitment Met.
- 8.d Clarification has been added to show that assessments will be performed in the 4Q05 to indicate there are no significant CAP prioritization errors.

- 9.a A completion date for “Average ACE quality grade is  $\geq$  85 sustained over a 3-month period” has been identified.
- 9.b The objective and commitment have been clarified.
- 10.b One of the “Methods to Verify the Commitment Met” was clarified from “Current” to “March 15, 2005.”
- 13.a Replaced the Methods to Verify Commitment Met “Nuclear Industry Evaluation Program (NIEP) audit 3Q06” with “Review effectiveness of Nuclear Oversight processes” due 3Q06 and clarified the commitment.

The table of commitments has been reformatted as follows:

- 1) The column titled “Summary and Status of Action Steps” has been changed to “Summary of Commitment Steps.”
- 2) The column titled “Methods to Verify Objective Met” has been changed to “Methods to Verify Commitment met.”
- 3) The column “Complete Date” is now “Commitment Completion Date” and has been moved to the far right of the table with all completion dates identified there.