

February 3, 2006

Mr. David A. Christian
Senior Vice President and
Chief Nuclear Officer
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: ERRATA TO KEWAUNEE NUCLEAR POWER PLANT
NRC INTEGRATED INSPECTION REPORT 05000305/2005017

Dear Mr. Christian:

On January 20, 2006, the U.S. Nuclear Regulatory Commission (NRC) issued Integrated Inspection Report 05000305/2005017 (ML0602004410). Following additional discussions with the station's training staff, it was identified that an NRC inspector misunderstood the overall results of the Licensed Operator Requalification Training (LORT) program annual examinations. This mis-understanding of licensed operator requalification examination results has been corrected. The pass/fail results of the LORT program examination was evaluated as a green finding in the area of licensed operator requalification training. The enclosed errata contains the revised information and should be inserted where appropriate into Integrated Inspection Report 05000305/2005017.

We apologize for any inconvenience to you and your staff.

Sincerely,

/RA/

Patrick L. Loudon, Chief
Projects Branch 5
Division of Reactor Projects

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

Enclosure: Errata to Inspection Report 05000305/2005017

See Attached Distribution

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ERRATA TO NRC INTEGRATED INSPECTION REPORT 05000305/2005017

1. On the cover letter, insert the following new paragraph after the second paragraph:

Based on the results of this inspection, the NRC has identified one issue that was evaluated under the significance determination process as having very low risk significance (Green). This issue was determined not to involve a violation of NRC requirements.

2. On page 1 of the SUMMARY OF FINDINGS, replace the second paragraph with the following paragraph:

The report covered a 3-month period of inspection by resident inspectors and announced inspections of licensed operator requalification by a regional operations engineer. One Green finding which was not a violation of NRC requirements and two Green findings, of which both were Non-Cited Violations (NCVs), were identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be "Green" or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

3. On page 2 of the SUMMARY OF FINDINGS, at the top of the page, insert the following new paragraph:

- Green. A finding of very low safety significance was identified. The finding was associated with unsatisfactory operating crew performance on the simulator during facility-administered licensed annual operator requalification examinations. Of the 7 crews evaluated, 2 did not pass their annual operating tests. The finding is of very low safety significance because the failures occurred during testing of the operators on the simulator, because there were no actual consequences to the failures, and because the crews were removed from watch-standing duties, retrained, and re-evaluated before they were authorized to return to control room watches. (Section 1R11.1)

4. On page 6 of the Enclosure (Inspection Report 05000305/2005017) under 1R11.1, Biennial Operating Test Results, replace paragraph b., Findings, with the following paragraph:

- b. Findings

Crew Performance on the Dynamic Scenario Portion of the 2005 Facility-Administered Annual Requalification Examination Operating Test

Introduction: The inspectors identified a (Green) finding of very low safety significance, based on 2 of 7 crews not passing the facility-administered dynamic scenario portion of their annual operating test.

Description: During facility-administered annual operating testing of the licensed operators, licensee training staff evaluated crew performance on dynamic scenarios using performance standards derived from NUREG-1021, "Operator Licensing Examination Standards for Power Reactors." Facility results of crew performance showed that 2 of the 7 crews evaluated (28.6 percent) did not pass their simulator exams. The licensee initiated CAP 30467 and planned to conduct a formal root cause evaluation in accordance with station procedures.

Analysis: A performance deficiency (PD) was identified in that 2 of 7 licensed operator crews operated the plant with knowledge and ability performance weaknesses resulting in performance that did not pass an NRC required annual operating test administered by the licensee. Traditional enforcement does not apply because the issue did not have any actual safety consequence or potential for affecting the NRC's regulatory function and was not the result of any willful violation of NRC requirements or licensee procedures. The finding is greater than minor because the PD affected the mitigating systems cornerstone objective to ensure mitigating system reliability and availability, and its related attribute on human performance (Human Error [Pre-Event and Post-Event]). Specifically, the finding reflected potential shortcomings responding to actual abnormal or emergency conditions. The risk associated with the number of crews not passing the annual operating test is provided in the Simulator Operational Evaluation Matrix of NRC Manual Chapter 0609, Appendix I, "Operator Requalification Human Performance Significance Determination Process (SDP)." The Matrix was entered using the number of crews that took the simulator test, 7, and 2 crews that demonstrated unsatisfactory performance and did not pass. Based on these numbers, the finding was characterized by the SDP as having very low safety significance (20 - 34 percent failure rate), or Green.

Enforcement: NRC regulations require that licensed operators pass an annual operating test; the regulations do not specify pass/fail rates. When a failure occurs, requirements are met by restricting the operator from licensed duties until the operator has been retrained and successfully retested, steps which the licensee staff completed. Therefore, no violation of regulatory requirements occurred. Crew performance on the 2005 annual operating exams has been entered into the CAP as CAP 30467 and Dominion is performing a full root cause evaluation of the crew failures.