Dominion Energy Kewaunee, Inc. N490 Highway 42, Kewaunee, WI 54216-9511



## JUN 1 9 2006

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555 Serial No. 06-519 KPS/LIC/RR: RO Docket No. 50-305 License No. DPR-43

## DOMINION ENERGY KEWAUNEE, INC. KEWAUNEE POWER STATION LICENSEE EVENT REPORT 2006-002-00

Dear Sirs:

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

Report No. 50-305/2006-002-00

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 Mr. Richard Repshas at (920) 388-8217.

Very truly yours,

Leslie N. Hartz Site Vice President, Kewaunee Power Station

Attachment

Commitments made by this letter: NONE

IP22

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cc: Regional Administrator, Region III U.S. Nuclear Regulatory Commission 2443 Warrenville Road Suite 210 Lisle, IL 60532-4352

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Mr. D. H. Jaffe Project Manager U.S. Nuclear Regulatory Commission Mail Stop O-7-D-1 Washington, D. C. 20555

NRC Senior Resident Inspector Kewaunee Power Station

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NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION (6-2004)						I APPHOVED BY OMB NO. 3150-0104 EXPIRES 6-30-2007									
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 led 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 NAP	AE (1)	·					DOCH		7 (2)	)		PAG	E (3)	····· ··	
Kowaupaa Bowar Station							05000305				••••	,	1 of	Л	
TITLE (4) Safety-Related Relay Racks with Improper Quality Clas							assification of Foxboro Signal Conditioning Modules								
EVI	ENT DATE (5)	)		ER NUMBER (6)		RE	PORT	DATE (7)	Γ	OTHER FACILITIES INVOLVED (8)					)
мо	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	мо	DAY	YEAR	F/	FACILITY NAME		DOCKET NUMBER			
04	18	2006	2006	002	00	06	19	2006	F/	ACILITY NAME		DOC ,	KETI	NUMBER	
OPERA	TING	N		THIS REPORT IS	S SUBI	MITTED	PURS	SUANT TO TH	IE R	REQUIREMENT	S OF 10 CI	FR D:	(Chec	k all that ap	ply) (11)
MODE	E (9)	IN IN	20.2	201(b)		20.22	203(a)(3)(ii)			50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)			
POW	ER	100	20.2	.2201(d)		20.22	203(a)	(4)		50.73(a)(2)(	(iii)	50.73(a)(2)(x)			
LEVEL	. (10)		20.2	203(a)(1)		50.36	6(c)(1)	(i)(A)	<u> </u>	50.73(a)(2)(	(iv)(A)	73.71(a)(4)			
			20.2	203(a)(2)(i)	_	50.36	5(c)(1)	(ii)(A)		50.73(a)(2)	(v)(A)		73.71	(a)(5)	
			20.2	203(a)(2)(ii)		50.36	5(c)(2)	/!!>	<u>↓</u>	50.73(a)(2)(	(v)(B)	<b>1</b> -19	OTHE	)THER	
			20.2203(a)(2)(iii) 20.2203(a)(2)(iv) 20.2203(a)(2)(iv)			50.40	46(a)(3)(ii)			50.73(a)(2)		NRC Form 366A			
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			20.2	203(a)(2)(v)	<u> </u>	50.70	$\frac{3(a)(2)(i)(b)}{3(a)(2)(i)(C)}$			50.73(a)(2)(VII)					
			20.2	203(a)(3)(i)	-{	50.73	3(a)(2)(ii)(A)		1.	50.73(a)(2)(viii)(A)					
				LICE	NSEE	CONT	ACT	FOR THIS I	.ER	(12)	12)				
NAME									TE	ELEPHONE NU	MBER (Incl	ude Ar	ea Co	de)	
Richard R	epshas						(920) 388-8217								
			ETE ONE	LINE FOR EA	<u>CH C</u>	OMPO	NENT	FAILURE	DES	SCRIBED IN T	HIS REPO	ORT (	13)		
CAUSE	CAUSE SYSTEN		PONENT	MANU- FACTURER	REPORTABL		: 10 	CAUSE	_	SYSTEM COMPO		ENT	FA	MANU- CTURER	REPORTABLE TO EPIX
	SU	IPPLEME	NTAL RE	PORT EXPECT	ED (1	4)				EXPECT	TED	MO	NTH	DAY	YEAR
YES (	If yes, compl	lete EXPE	CTED SUBMISSION DATE).				XII	0/	SUBMISSION DATE (15)						
ABSTRACT							<b>-</b>		-			<u> </u>			
On April 1 contain Fo Equipmen require a o modules v identified 1	8, 2006 a oxboro sig t powere classifica vere iden that that (	at 1200 gnal con d throug tion of s tified th did not l	central nditioni gh thes safety-r at did r have a	l standard t ng modules e relay rac elated for e not have a s safety-rela	ime ( s tha ks w lectr safet ted c	(CST t did as de ical t y-rela lassi	), re not l eclar boun ated ficat	lay racks have the ed inope dary and classific ion in RF	R re aral 1 no atio R-1	R-119 and quired saf ble. The s on safety- on in RR-1 20.	d RR-12 ety-rela signal c related 119 anc	20 w ited ondi for f f two	vere qua tioni unc o mo	identifie lity clas ing moo tion. Fo odules v	ed to sification. Jules our vere
The follow RR-120 (T valve outle ventilation	ring instru Train B): et temper damper	umental Reacto ature, p control	tion and r coola pressur	d equipmen nt system s izer power	it we subco oper	re de ooling ated	eclare g, rea relie	ed inope actor ves of valve c	rat sse outl	ble for rela el level ind let tempera	iy racks ication ature, a	s RR syst ind s	-119 em, shiel	9 (Train pressu d buildi	A) and rizer safety ng
The statio	n entered system l	d a 12-h being d	our Te eclarec	chnical Spe I inoperable	ecific e. Th	ation is TS	n (TS S was	6) action s exited a	sta at 1	atement fo 1611 CST	r both t on Apr	rains il 18	s of , 20	the shie 06 with	eld building the return

to service of RR-120. A seven day action statement for one train of the shield building ventilation system being inoperable was exited with RR-119 returned to service at 2128 CST on April 18, 2006.

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This event was reported under 10 CFR 50.72(b)(3)(v)(C) for any event that could have prevented the fulfillment of the safety function of systems needed to control the release of radioactive material and is considered a safety system functional failure.

NRC FOR	М :	366	A
(1-2001)			

## U.S. NUCLEAR REGULATORY COMMISSION

## LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION									
FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)				PAGE (3)			
Kewaunee Power Station	05000305	YEAR SEQUENTIAL REVIS		REVISION NUMBER	2 of 4				
		2006		002		00			
TEXT (If more space is required, use additional copies of NRC Form 366A) (17)									
On April 18, 2006 at 1200 central standard time (CST), relay [RLY] racks [RK] RR-119 and RR-120 were identified to contain Foxboro signal conditioning modules that did not have the required safety-related quality classification. Equipment powered through these relay racks was declared inoperable. The signal conditioning modules require a classification of safety-related for electrical boundary and non safety-related for function. Four modules were identified that did not have a safety-related classification in RR-119 and two modules were identified that did not have a safety-related classification in RR-119 and two modules were identified that did not have a safety-related classification in RR-120.									
The following instrumentation and equipment power (Train B) were declared inoperable: Reactor coolan system, pressurizer safety value outlet temperature f	ed through relay ra t system subcoolir TII. pressurizer po	acks Rf ng [TI], ower op	R-119 reacto erate	) (Trai or ves d relie	in A) ssel ef va	) and RR level [Ll] alve outle	-120 indication t		

temperature [TI], and shield building ventilation damper control [CDMP].

The station entered a 12-hour Technical Specification (TS) action statement for both trains of the shield building ventilation system being declared inoperable. This TS was exited at 1611 CST on April 18, 2006 with return to service of RR-120. A seven day action statement for one train of the shield building ventilation system being inoperable was exited with RR-119 returned to service at 2128 CST on April 18, 2006.

The relay racks were declared inoperable due to non safety-related fuses [FU] and cables [CBL] installed in six of the signal conditioning modules in these relay racks. The instruments associated with the six modules were not found in TS required instruments or alarms. The concern was that a downstream failure on the non safetyrelated modules could impact safety-related equipment since it did not have safety-related fault protection.

This event was reported under 10 CFR 50.72(b)(3)(v)(C) "Any event that at the time of discovery could have prevented the fulfillment of the safety function of systems that are needed to control the release of radioactive material." Event Notification Number 42509 was made on April 18, 2006 at 1922 CST.

An extent of condition was initiated to review all relay racks. Relay racks RR-101, RR-102, RR-103, RR-104, RR-105, RR-116, RR-117, RR-118, RR-119, and RR-120 were determined to have safety classification issues. Engineering evaluated if the equipment contained inside the relay racks was properly evaluated for the safety classification assignment. The purchase orders were reviewed for proper safety classification and the work history was reviewed for proper safety classification. All discrepancies were evaluated to determine the potential impact on safety related functions. Actions were taken as necessary to upgrade the applicable modules to the proper safety classification by either returning the module to the vendor for refurbishment and recertification or replacing the module. Further evaluation determined that none of the discrepancies impacted a safety-related function.

The Foxboro modules classified as non safety-related are maintained under the same vendor manuals, which use the same part numbers, as those classified as safety-related. All the parts purchased as spares are qualified as safety-related to avoid the possibility of putting non safety-related parts in safety-related applications. The power plug [CON] and cord set, chassis, fuse, and fuse holder are the same construction as all other Foxboro "H" line series of modules.

NRC FORM 366A			U.S. NUCLEAR REG	ULATORY CO	MMISSION				
(1-2001)		_ /							
LICENSEE EVENT REPORT (LER)									
TEXT CONTINUATION									
FACILITY NAME (1)	DOCKET NUMBER (2)		LER NUMBER (6)		PAGE (3)				
Kewaunee Power Station	05000305	YEAR	NUMBER	NUMBER	3 of 4				
		2006	002	00					
TEXT (If more space is required, use additional copies of NRC Form 366A) (17)									
Event Analysis and Safety Significance:									
		(D) ((A			4 h a t a a				
I his event is being reported in accordance with 10 C prohibited by the plant's Technical Specifications" at	of to CFB 50.73(a)(2)(I)	(B) "Any a)/2)(v)/	C) "Any even	condition t or condit	ion that				
could have prevented the fulfillment of the safety fun	nction of structures	s or syst	ems that are	needed to	control				
the release of radioactive material."									
	hat aculd matantia	lle ha la	-*	votoo of th	a abiald				
Equipment and instrumentation important to safety in building ventilation damper controls and accident inst	nat could potentia	lly de lo: e scena	rio would be f	rains or in for an inte	e snieiù mal				
electrical short to occur in a non safety-related Foxb	oro module in eac	h of rela	ay racks RR-1	19 and RI	R-120				
that could cause the entire loss of safety-related pov	ver to the relay rac	cks.	•						
Descention of the chiefd building continuing	nuctors in required	te este	blick contains	nont inton					
Proper functioning of the shield building ventilation s	system is required t be violated if the	re is fue	l in the reacto	r which ha	niy. 15 as been				
used for power operation, except whenever either of	the following con	ditions r	emains satisf	ied: (1) T	he reactor				
is in the cold shutdown condition with the reactor ves	ssel head installed	l, or (2)	The reactor is	s in the ref	ueling				
shutdown condition."	shutdown condition."								
To Table TO 2.5.6 contains the aposition for the instrumentation declared insperable. TO 2.5 c states:									
"The accident monitoring instrumentation in Table T	S 3.5-6 shall be o	berable	whenever the	plant is a	bove hot				
shutdown." The basis for this is to assure there is su	ufficient informatio	n availa	ble to aid the	operator i	n				
identification of an accident and assessment of plan	t conditions during	and fol	llowing an acc	cident. Alt	hough				
this event caused some of the 1S Table 1S 3.5-6 ins	strumentation to b	e inopei	rable, operatio	on was wit	nin the				
This is considered a safety system functional failure since this condition could have prevented the fulfillment of									
the safety function of systems that are needed to control the release of radioactive material.									
The safety significance associated with this event is minimal. The probabilistic risk model for Kewaupee									
analyzes for contributions to core damage and a large early release from containment. The shield building									
ventilation system is not a contributor to the core damage frequency or the large early release frequency,									
therefore the safety significance is minimal.									
Cause:									
I he initial results of the investigation determined that	t the causes of the	e relay r	ack equipmer	nt satety	stv-				
related modules in safety-related relay racks by the L	use of the asset da	atabase	information ir	n the deve	lopment				
of maintenance work orders.									

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NRC FORM 366A		U.S. NUCLEAR REGULATORY COM	AMISSION							
(1-2001)										
LICENSEE EVENT REPORT (LER)										
TEXT C	ONTINUATION									
FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)							
Kewaunee Power Station	05000305	YEAR SEQUENTIAL REVISION NUMBER NUMBER	4 of 4							
		2006 002 00								
TEXT (If more space is required, use additional copies of NRC Form 366A) (17)										
Corrective Actions:										
<ol> <li>The non safety-related signal conditioning modules for RR-119 and RR-120 were immediately replaced or unplugged.</li> </ol>										
<ol> <li>An extent of condition review was performed instrumentation and components powered th found.</li> </ol>	<ol> <li>An extent of condition review was performed to determine the safety-related functions of instrumentation and components powered through the relay racks and correct any discrepancies found.</li> </ol>									
<ol> <li>The necessary safety classification changes process of being changed.</li> </ol>	<ol><li>The necessary safety classification changes to the asset database were identified and are in the process of being changed.</li></ol>									
Similar Events:										
None.										

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