



AUG 17 2007

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

Serial No. 07-0544
KPS/LIC/JG: RO
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
LICENSEE EVENT REPORT 2007-008-00

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. 50-305/2007-008-00

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. Jack Gadzala at (920) 388-8604.

Very truly yours,

Leslie N. Hartz
Site Vice President, Kewaunee Power Station

Attachment

Commitments made by this letter: NONE

JE22

MRR

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

Mr. P. D. Milano
Project Manager
U.S. Nuclear Regulatory Commission
Mail Stop O-8C2
Washington, DC 20555-0001

NRC Senior Resident Inspector
Kewaunee Power Station

NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION (6-2004)	APPROVED 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 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 Power Station	DOCKET NUMBER (2) 05000305	PAGE (3) 1 of 3
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TITLE (4) Inadequate Emergency Diesel Generator Testing when Redundant Emergency Diesel Generator was Inoperable

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	
06	19	2007	2007	-- 008	-- 00	08	17	2007	FACILITY NAME	DOCKET NUMBER	
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR : (Check all that apply) (11)								
POWER LEVEL (10)		100	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 Jack Gadzala	TELEPHONE NUMBER (Include Area Code) (920) 388-8604

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)		
YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO				

ABSTRACT

On June 19, 2007, Dominion Energy Kewaunee was verbally informed that NRC staff determined that a load test of the emergency diesel generator (EDG) was needed for demonstrating compliance with Technical Specification (TS) 3.7.b.2. This determination was made in response to a review of past operating practice at Kewaunee Power Station (KPS) regarding performance of a daily test of the redundant (other) EDG required by TS 3.7.b.2 when one EDG is inoperable.

Historically, a start test of the redundant (other) EDG was performed to satisfy the daily test required by TS 3.7.b.2. However, the recent communications with NRC staff indicated that a start test of an EDG was insufficient for demonstrating compliance with TS 3.7.b.2. Rather, a load test in addition to a start test should have been performed.

A record review identified two recent instances where daily surveillance testing of the redundant (other) EDG required by TS 3.7.b.2 had been performed (May 31 and July 26, 2006). This daily testing did not include a load test. However, subsequent monthly start and load testing performed per TS 4.6.a.1 confirmed that the EDGs had been operable.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1) Kewaunee Power Station	DOCKET NUMBER (2) 05000305	LER NUMBER (6)			PAGE (3) 2 of 3
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		2007	- 008	- 00	

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

Event Description:

On June 19, 2007, Dominion Energy Kewaunee was verbally informed that NRC staff determined that a load test of the emergency diesel generator (EDG) [DG] was needed for demonstrating compliance with Technical Specification (TS) 3.7.b.2. This determination was made in response to a review of past operating practice at Kewaunee Power Station (KPS) regarding performance of a daily test of the redundant (other) EDG required by TS 3.7.b.2 when one EDG is inoperable.

TS 3.7.b.2 states "One diesel generator may be inoperable for a period not exceeding 7 days provided the other diesel generator is tested daily to ensure OPERABILITY and the engineered safety features associated with this diesel generator are OPERABLE."

Historically, a start test of the redundant (other) EDG was performed to satisfy the daily test required by TS 3.7.b.2. However, recent communications with NRC staff indicated that a start test of an EDG was insufficient for demonstrating compliance with TS 3.7.b.2. Rather, a load test in addition to a start test should have been performed.

A record review identified two recent instances where daily surveillance testing of the redundant (other) EDG required by TS 3.7.b.2 had been performed (May 31 and July 26, 2006). This daily testing did not include a load test. However, subsequent monthly start and load testing performed per TS 4.6.a.1 confirmed that the EDGs had been operable.

A related event, regarding failure to perform the required test within the 24 hour period, was reported on September 11, 2006 (LER 2006-008-00) in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications."

Event and Safety Consequence Analysis:

On July 25, 2006, SW [BI] train B was declared inoperable. Each SW train supports its associated EDG by providing cooling water. With one train of SW inoperable, components supported by that train are also considered inoperable. Consequently, EDG B was also declared inoperable (cascading TS).

KPS TS do not contain an allowance analogous to Standard TS LCO 3.0.6 wherein only the support system LCO actions are required to be entered (except where explicitly stated). When one train of SW is inoperable at KPS, components supported by that train are inoperable, which includes the associated EDG. Such a condition requires entry into TS 3.7.b.2 for the inoperable EDG. TS 3.7.b.2 states "One diesel generator may be inoperable for a period not exceeding 7 days provided the other diesel generator is tested daily to ensure OPERABILITY and the engineered safety features associated with this diesel generator are OPERABLE."

With one EDG that has become or was rendered inoperable, KPS TS require that the other EDG be tested to ensure operability as a condition of the seven day allowance for continued operation. This testing is intended to assure that the other EDG has not become inoperable due to a common cause failure. TS 3.7.b.2 does not specify what test must be performed to fulfill the testing requirement.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Kewaunee Power Station	05000305	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 of 3
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Based on the historically understood intent of the TS when the plant was licensed, previous communications with the NRC, and industry experience with EDG operability, the KPS staff considered a start test of the EDGs to be an appropriate daily test to "ensure OPERABILITY."

Existing industry guidance describes that a load test to satisfy TS 3.7.b.2 reduces EDG availability because such a test renders both EDGs inoperable longer than necessary to demonstrate the operability of the DG.

In summary, testing of the operable EDG by starting the engine (without load testing) was considered appropriate for satisfying the requirement of KPS TS 3.7.b.2 and was consistent with industry practice for maintaining EDG reliability and in accordance with NUREG-1431. Therefore, only a start test of the OPERABLE EDG had been performed in the past.

There were no events or conditions that could have prevented the fulfillment of the safety function of systems (opposite train equipment was operable) associated with this condition. Since EDG A was subsequently proven operable by starting and loading, there was no safety significance associated with this event.

Cause:

The cause for only performing a start test rather than a load test was due to longstanding perception and practice that a start test was appropriate for fully satisfying the requirements of TS 3.7.b.2.

Based on the historically understood intent of the TS when the plant was licensed, previous communications with the NRC, and industry experience with EDG operability, the KPS staff considered a start test of the EDGs to be an appropriate daily test to "ensure OPERABILITY."

In addition to the industry guidance discussed previously, KPS staff believed a load test was not required based on previous correspondence. NRC Inspection Report 79-02 issued a Notice of Violation (NOV) to KPS for making the other EDG inoperable during a daily operability test that included a load test. The KPS response to the NOV stated that operating instructions prohibiting load testing of a DG, while the second DG was out of service, had been issued to prevent reoccurrence. The NRC acknowledged this corrective action in their NOV closeout letter dated November 21, 1979, and considered it to be adequate.

Therefore, based on industry guidance and previous correspondence, KPS' procedures did not require a load test of the remaining operable DG.

Corrective Actions:

1. The KPS Technical Requirements Manual (TRM) was revised to require performance of the surveillance requirement specified in TS 4.6.a.1 to satisfy the LCO requirements of TS 3.7.b.2. Performance of this testing would render both EDGs inoperable and require entry into TS LCO 3.0.c, "Standard Shutdown Sequence". However, the time required to perform this test is sufficiently short such that it would normally not require initiation of a TS required plant shutdown.
2. As long term corrective action, a license amendment request is being prepared to propose revising the KPS TS to allow testing of the EDGs consistent with NUREG-1431, Standard Technical Specifications.

Similar Events:

LER 2006-008-00, Diesel Generator Operability Testing Interval Exceeded