



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
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October 14, 2010

Mr. David A. Heacock
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**SUBJECT: KEWAUNEE POWER STATION – NRC PROBLEM IDENTIFICATION AND
RESOLUTION INSPECTION 05000305/2010006**

Dear Mr. Heacock:

On September 3, 2010, the U.S. Nuclear Regulatory Commission (NRC) completed a Problem Identification and Resolution (PI&R) team inspection at your Kewaunee Power Station. The enclosed report documents the inspection findings, which were discussed on September 3, 2010, with Mr. Stephen Scace and other members of your staff.

This inspection was an examination of activities conducted under your license as they relate to the identification and resolution of problems, and compliance with the Commission's rules and regulations and the conditions of your operating license. Within these areas, the inspection involved examination of selected procedures and representative records, observations of activities, and interviews with personnel.

On the basis of the sample selected for review, the team concluded that, in general, problems were properly identified, evaluated, and corrected. There were two findings identified during this inspection during our review of your investigations and corrective actions for previously identified NRC findings. One finding involved your failure to provide licensed operators with correct procedures and instructions for determining which valves are containment isolation valves. The other finding involved your failure to update the Updated Safety Analysis Report (USAR) to describe for each containment penetration, the penetration category, the type of leakage test required, and the applicable leakage test method. These findings were determined to be violations of NRC requirements. However, because of their very low safety significance and because they have been entered into your corrective action program, the NRC is treating these findings as non-cited violations (NCVs), in accordance with Section 2.3.2 of the NRC's Enforcement Policy.

If you contest the subject or severity of these NCVs, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission - Region III, 2443 Warrenville Road, Suite 210, Lisle, IL 60532-4352; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the Resident Inspector Office at the Kewaunee Power Station. In addition, if you disagree with the cross-cutting aspect assigned to any finding in this report, you should provide a response within 30 days of the date

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of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region III, and the NRC Resident Inspector at the Kewaunee Power Station.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Michael A. Kunowski, Chief
Branch 5
Division of Reactor Projects

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

Enclosure: Inspection Report 05000305/2010006
w/Attachment: Supplemental Information

cc w/encl: Distribution via ListServe

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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

Report No: 05000305/2010006

Licensee: Dominion Energy Kewaunee, Inc.

Facility: Kewaunee Power Station

Location: Kewaunee, WI

Dates: August 16, 2010, through September 3, 2010

Inspectors: J. Rutkowski, Senior Resident Inspector, Davis-Besse,
Team Lead
K. Barclay, Resident Inspector
C. Brown, Reactor Inspector, Electrical
D. Szwarc, Senior Reactor Inspector

Approved by: Michael A. Kunowski, Chief
Branch 5
Division of Reactor Projects

Enclosure

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SUMMARY OF FINDINGS

IR 05000305/2010006; 08/16/2010 – 09/03/2010; Kewaunee Power Station; Routine Biennial Problem Identification and Resolution Inspection; Effectiveness of Prioritization and Evaluation of Issues.

This inspection was performed by the Davis-Besse senior resident inspector, two NRC regional inspectors, and the Kewaunee resident inspector. Two Green findings were identified by the inspectors. The findings were considered non-cited violations of NRC regulations. 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 (SL) 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 4, dated December 2006.

Problem Identification and Resolution

On the basis of the sample selected for review, the team concluded that implementation of the corrective action program (CAP) at Kewaunee was generally good. The licensee had a low threshold for identifying problems and entering them in the CAP. Items entered into the CAP were screened and prioritized in a timely manner using established criteria; were properly evaluated commensurate with their safety significance; and corrective actions were generally implemented in a timely manner, commensurate with the safety significance. The team noted that the licensee reviewed operating experience for applicability to station activities. Audits and self-assessments were determined to be performed at an appropriate level to identify deficiencies. On the basis of interviews conducted during the inspection, workers at the site expressed freedom to enter nuclear safety concerns into the CAP and were encouraged to enter items.

A. NRC-Identified and Self-Revealed Findings

Cornerstone: Barrier Integrity

- **Green**. A finding of very low safety significance and associated non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," was identified by the inspectors for the failure to correct a condition adverse to quality. Specifically, the licensee failed to provide their licensed operators with correct procedures and instructions for determining which valves were containment isolation valves. The condition was previously identified on August 12, 2009, when the inspectors found MS-100A, the steam supply to the turbine-driven auxiliary feedwater pump, open without the capability to be remotely closed from the control room and without a technical specification entry for the containment isolation function. The licensee entered the issue, during the current inspection, into their corrective action program and took short-term corrective actions of placing a standing order in the control room directing operators to enter the appropriate containment isolation technical specifications for the valves in question.

The finding was determined to be more than minor, because, if left uncorrected, has the potential to lead to a more significant safety concern. The inspectors concluded this finding was associated with the Barrier Integrity Cornerstone. The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609,

“Significance Determination Process,” Attachment 0609.04, “Phase 1 - Initial Screening and Characterization of Findings,” Table 4a, for the Barrier Integrity Cornerstone. The inspectors answered “no” to the Barrier Integrity Cornerstone questions and screened the finding as having very low safety significance (Green). This finding has a cross-cutting aspect in the area of human performance within the resources component because the licensee did not maintain complete, accurate and up-to-date design documentation (H.2(c)). (Section 4OA2.1.b(2))

- Green SL IV. The inspectors identified a Severity Level IV, non-cited violation of 10 CFR 50.71(e), “Maintenance of Records, Making of Reports,” having very low safety significance. The inspectors found that the licensee failed to update the Updated Safety Analysis Report (USAR) to describe for each containment penetration, the penetration category, the type of leakage test required, and the applicable leakage test method. The licensee entered this into their corrective action program. The inspectors found the violation to be more than minor in accordance with the NRC Enforcement Policy, Section 6.1.d, Example 3, in that the failure to update the Final Safety Analysis Report (FSAR) would not have a material impact on safety or licensed activities. This issue was determined to be a Severity Level IV violation since it was similar to a Severity Level IV violation example in the NRC Enforcement Policy. Additionally, in accordance with the Enforcement Policy, this violation is categorized as Severity Level IV because the resulting changes were evaluated by the SDP as having very low safety significance (Green).

Violations of 10 CFR 50.71 are dispositioned using the traditional enforcement process instead of the significance determination process (SDP) because they are considered to be violations that potentially impede or impact the regulatory process. The underlying finding is evaluated under the SDP to determine the significance of the violation. In this case, the finding was determined to be more than minor because, if left uncorrected, it had the potential to lead to a more significant safety concern. The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, “Significance Determination Process,” Attachment 0609.04, “Phase 1 - Initial Screening and Characterization of Findings,” Table 4a, for the Barrier Integrity Cornerstone. The inspectors answered “no” to the Barrier Integrity Cornerstone questions and screened the finding as having very low safety significance (Green). The inspectors did not identify a cross-cutting aspect associated with the finding because the finding was not representative of current performance. (Section 4OA2.1.b(2))

B. Licensee-Identified Violations

No violations were identified.

REPORT DETAILS

4. OTHER ACTIVITIES

4OA2 Problem Identification and Resolution (71152B)

The activities documented in sections .1 through .4 constituted one biennial sample of problem identification and resolution as defined in IP 71152.

.1 Assessment of the Corrective Action Program Effectiveness

a. Inspection Scope

The inspectors reviewed the licensee's corrective action program (CAP) implementing procedures and attended CAP meetings to assess the implementation of the CAP by site personnel.

The inspectors reviewed risk and safety significant issues in the licensee's CAP since the last NRC Problem Identification and Resolution (PI&R) inspection in May and June 2008. The selection of issues ensured an adequate review of issues across NRC cornerstones. The inspectors used issues identified through NRC generic communications, department self-assessments, licensee audits, operating experience reports, and NRC documented findings as sources to select issues. Additionally, the inspectors reviewed issue reports generated as a result of facility personnel's performance in daily plant activities. In addition, the inspectors reviewed condition reports (CRs) and a selection of completed investigations from the licensee's various investigation methods, which included root cause, apparent cause, equipment apparent cause, common cause, and human performance investigations.

The inspectors selected one of the high-risk systems, the turbine building ventilation system, to review in detail. The inspectors' review was to determine whether the licensee staff were properly monitoring and evaluating the performance of this system through effective implementation of station monitoring programs. A five-year review on the system was also undertaken to assess the licensee staff's efforts in monitoring for system degradation due to aging. The inspectors also performed partial system walkdowns of the turbine building ventilation system, emergency diesel generators, component cooling water system, switchgear rooms, and service water system. The inspectors also reviewed the use of the station maintenance rule program to help identify equipment issues.

During the reviews, the inspectors determined whether the licensee staff's actions were in compliance with the facility's CAP and 10 CFR Part 50, Appendix B requirements. Specifically, the inspectors determined if licensee personnel were identifying plant issues at the proper threshold, entering the plant issues into the station's CAP in a timely manner, and assigning the appropriate prioritization for resolution of the issues. The inspectors also determined whether the licensee staff assigned the appropriate investigation method to ensure the proper determination of root, apparent, and contributing causes. The inspectors also evaluated the timeliness and effectiveness of corrective actions for selected issue reports, completed investigations, and NRC findings, including non-cited violations (NCVs).

b. Assessment

(1) Effectiveness of Problem Identification

Based on the information reviewed, the inspectors concluded that the threshold for initiating CRs was appropriate and was consistent with the plant procedural requirements. The inspectors concluded that the program was effective at identifying issues.

Findings

No findings were identified.

Observations

Identification of Issues

The inspectors generally found that issues were being identified and captured in the licensee's CR system. The licensee initiated about 8,000 to 9,000 CRs per year with most being relatively low significance (level 4 or level 3). Interviewed personnel indicated that they were expected to write CRs for issues and did write CRs although construction personnel and security personnel did not necessarily write CRs at the working level. However, all groups, including construction and security stated that bringing problems/issues to supervisors was effective. The inspectors did not identify any issues where it was clear that personnel should have written CRs and did not. Inspectors did question why Quality Surveillance Reports (QSRs) seemed to have identified issues but seldom did the reports indicate that CRs were written.

The inspectors were originally told that the surveillance issues were not "conditions adverse to quality." That did not appear to comply with section 3.1.1 of licensee procedure PI-AA-200, "Corrective Action." Specifically, the requirement to submit a CR for any issue or concern that does not meet specific requirements of procedures, policies, management expectations, or accepted industry practices. Subsequently, the licensee indicated that after QSR issues were discussed with departments, CRs were generated for many of the identified items, although this not shown on the QSRs.

The inspectors reviewed assessments associated with all of the licensee's major departments and also reviewed programs in addition to the CAP and the work order system. These included the Maintenance Rule process and use of operating experience (OE). Issues identified in those assessments and through those programs appeared to be appropriately captured in the CAP.

Review of Turbine Building Ventilation System

The inspectors performed a detailed review of issues entered into the CAP for the past five years for the turbine building ventilation system. As part of that effort, the resolution of NCV 05000305/2007006-20, "Inadequate Screen-House Ventilation Damper Maintenance," was reviewed. The inspectors interviewed the system engineer and determined that the resolution of the NCV appeared adequate but was difficult to follow using the documentation in the licensee's CR system. The inspectors also reviewed a root cause evaluation (RCE) on the failure of turbine building fan coil unit "A" to start in 2009 (RCE 970). That RCE did not identify a root cause because adequate

troubleshooting was not performed after the 2009 event. The licensee identified problems with inadequate troubleshooting which was also an issue during previous system failures in 2000 and 2007. The inspectors determined that the licensee had subsequently taken appropriate corrective actions to address the inadequacies identified with their troubleshooting methods. Review of effectiveness review EFR236 indicated that no similar troubleshooting issues had occurred since mid-2009.

(2) Effectiveness of Prioritization and Evaluation of Issues

Inspectors reviewed the classification of CRs for resolution ranging from “1,” for the most significant, to “4,” the least significant. Inspectors also attended the Condition Review Trending meetings to observe the management review of CR classification. All CRs were assigned appropriate prioritization and evaluation levels.

Findings

a. Failure to Correct the Classification of a Containment Isolation Valve

Introduction

The inspectors identified a finding of very low safety significance and associated NCV of 10 CFR Part 50, Appendix B, Criterion XVI, “Corrective Action,” for the failure to correct a condition adverse to quality. Specifically, the licensee failed to provide their licensed operators with correct procedures and instructions for determining which valves are containment isolation valves. The condition was previously identified on August 12, 2009, when the inspectors found MS-100A, the steam supply to the turbine-driven auxiliary feedwater pump (TDAFP), open without the capability to be remotely closed from the control room and without a technical specification entry for the containment isolation function.

Description

On August 12, 2009, the inspectors observed a post-maintenance test of MS-100A, the steam generator “1A” steam supply isolation valve to the TDAFP pump, after the control power transformer was replaced. The inspectors expected to find the valve closed prior to the start of the test, but when the inspectors arrived in the control room, the valve was open.

MS-100 is the first isolation valve outside of containment, in parallel with other isolation valves, for containment penetration 6W, the “A” main steam header penetration. Penetration 6W was described in Table 5.2-3 of the Updated Safety Analysis Report (USAR) as a Class 4 penetration. The USAR describes Class 4 penetrations as “normally operating incoming and outgoing lines which penetrate the Reactor Containment Vessel, and are connected to closed systems inside the Reactor Containment Vessel, and which have a low probability of being ruptured by the assumed accident.” The USAR stated that these lines are provided with at least one remotely-operated valve located outside the Reactor Containment Vessel. The inspectors were concerned because during the replacement of the control power transformer the valve was left open without the capability to be remotely closed from the control room.

The inspectors further reviewed the USAR and found that Table 5.2-3 did not list MS-100 as a containment isolation valve. The inspectors also found a statement that Table 5.2-3 was not intended to be an all-inclusive listing of containment isolation valves; only major components associated with each penetration were included. The inspectors' review determined that a comprehensive list of containment isolation valves did not exist in a procedure, instruction, or the USAR, and that no resources existed to provide the operators information on which valves were containment isolation valves.

The inspectors presented the information to the licensee, who agreed that they should have entered the containment isolation technical specification (TS) action requirement 3.6.b.3.c when MS-100A was inoperable. The inspectors documented an NCV of 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," in the 2009 third quarter integrated inspection report (05000305/2009004) for the licensee's failure to have adequate procedures to ensure TSs were entered and followed for containment isolation valves.

As part of this PI&R inspection, the inspectors reviewed the corrective actions from the violation in 2009 described above and found that the licensee had changed their position and now believed that the entire penetration did not have a containment isolation valve that was covered by the containment TSs. The inspectors interviewed two shift managers and asked how they would determine if a valve were a containment isolation valve. Both shift managers stated that they would review the in-service testing (IST) basis document for the valves in question and also rely on engineering support. The inspectors reviewed the IST basis, a non-controlled document, for MS-1 (main steam line isolation valve) and MS-2 (main steam isolation bypass valve) and found that both valves had been listed as containment isolation valves, which was inconsistent with the position presented to the inspectors by engineering. The inspectors inquired about the discrepancy; the licensee found that a corrective action to train the operators on using USAR Table 5.2-3 as the comprehensive source of containment isolation valves was documented as complete but never occurred because other training became more of a priority. The licensee subsequently entered this into the CAP and created a standing order that directed the operators to use USAR Table 5.2-3 as the resource for determining whether valves were containment isolation valves.

The inspectors then reviewed the licensee response to an NRC staff request for additional information (RAI) dated March 7, 2001, related to License Amendment Request 165a, and found that the licensee stated "Kewaunee has 14 penetrations with a single containment isolation valve." The licensee had provided in the response a table of the 14 penetrations. The inspectors discussed this 2001 document with the licensee and the licensee agreed that MS-100A and the valves associated with the penetrations listed in the RAI response were, in fact, containment isolation valves. The licensee entered this into the CAP and placed a new standing order in the control room directing operators to enter the appropriate containment isolation TS for the valves in question.

Analysis

The inspectors determined that failing to correct the problem in 2009, with the condition adverse to quality, was a performance deficiency. The finding was determined to be more than minor in accordance with Inspection Manual Chapter (IMC) 0612, "Power Reactor Inspection Reports," Appendix B, "Issue Screening," dated December 24, 2009, because, if left uncorrected, it had the potential to lead to a more significant safety

concern. Specifically, not entering the appropriate technical specification action requirement, when necessary, would result in not taking the appropriate actions when the containment valves were inoperable beyond the prescribed time limits. The inspectors concluded this finding was associated with the Barrier Integrity Cornerstone.

The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 - Initial Screening and Characterization of Findings," Table 4a, for the Barrier Integrity Cornerstone, dated January 10, 2008. The inspectors answered "no" to the Barrier Integrity Cornerstone questions and screened the finding as having very low safety significance (Green).

This finding has a cross-cutting aspect in the area of human performance within the resources component because the licensee did not maintain complete, accurate, and up-to-date design documentation. Specifically, the licensee failed to maintain a comprehensive list of containment isolation valves and the USAR did not identify the valves that applied to the containment isolation TS (H.2(c)).

Enforcement

Title 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances, are promptly identified and corrected. Contrary to this, from August 12, 2009, through June 2010, the licensee failed to promptly correct a condition adverse to quality with containment isolation valves. Specifically, the licensee failed to provide to operators procedures or instructions containing an accurate, comprehensive list of containment isolation valves; the licensee failed to correct USAR Table 5.2-3 and identify MS-100A as a containment isolation valve; and lastly, the licensee failed to train their operators to use USAR Table 5.2-3 as the comprehensive list of containment isolation valves. Because this violation was of very low safety significance and was entered into the licensee's CAP (as CR393475), this violation is being treated as an NCV, consistent with Section 2.3.2 of the NRC Enforcement Policy (NCV 05000305/2010006-01, Failure to Correct the Classification of a Containment Isolation Valve).

The licensee took short-term corrective action of placing a standing order in the control room directing operators to enter the appropriate containment isolation technical specifications for the valves in question.

b. Failure to Update the Updated Safety Analysis Report to Include Containment Penetration Leakage Testing Information

Introduction

The inspectors identified a finding of very low safety significance and an associated Severity Level IV, non-cited violation of 10 CFR 50.71(e), "Maintenance of Records, Making of Reports." Specifically, the inspectors found that the licensee failed to update the USAR to describe for each containment penetration, the penetration category, the type of leakage test required, and the applicable leakage test method.

Description

As part of this PI&R inspection, the inspectors reviewed the corrective actions from a 2009 NRC violation related to the licensee's classification of containment isolation valves. During that review, the inspectors noted that on December 1, 1986, the NRC approved the licensee's TS Amendment Request No. 52, titled "Appendix J to 10 CFR 50 Containment Leakage Testing," thereby, incorporating it into the Kewaunee license. In this request, the licensee stated that USAR Table 5.2-2, pertaining to containment penetrations, would be updated to include for each containment penetration, the penetration category, the type of leakage test required, and the leakage test method. However, the inspectors identified that Table 5.2-3 (the re-designated Table 5.2-2) had not been updated with this information. This issue was discussed with a licensee staff person who entered it into the CAP.

Analysis

The inspectors determined that the failure to update the USAR Table 5.2-2 to include the penetration category, the type of test required, and the applicable test method was a performance deficiency warranting a significance evaluation. The inspectors found the finding to be more than minor in accordance with the NRC Enforcement Policy, Section 6.1.d, Example 3, which addresses a failure to update the FSAR not having a material impact on safety or licensed activities. Specifically, the failure to include the penetration category, the type of test required, and the applicable test method in USAR Table 5.2-2 (now Table 5.2-3), would allow the licensee to remove or make changes to the type of test or test method without an appropriate safety evaluation or regulatory review. This issue was determined to be a Severity Level IV violation since it was similar to a Severity Level IV violation example in the NRC Enforcement Policy, dated September 30, 2010. Specifically, NRC Enforcement Policy, Section 6.1.d.3. states, "A failure to update the FSAR as required by 10 CFR 50.71(e) in cases where the erroneous information is not used to make an unacceptable change [i.e., one that results in a White, Yellow, or Red finding] to the facility or procedures."

Violations of 10 CFR 50.71 are dispositioned using the traditional enforcement process instead of the SDP because they are considered to be violations that potentially impede or impact the regulatory process. The underlying finding is evaluated under the SDP to determine the significance of the violation. In this case, the finding was determined to be more than minor in accordance with IMC 0612, "Power Reactor Inspection Reports," Appendix B, "Issue Screening," dated December 24, 2009, because, if left uncorrected, it had the potential to lead to a more significant safety concern. Specifically, containment isolation valves requiring leakage testing may have had their testing requirement improperly removed or methods of test improperly changed. The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 - Initial Screening and Characterization of Findings," Table 4a, dated January 10, 2008, for the Barrier Integrity Cornerstone. The inspectors answered "no" to the Barrier Integrity Cornerstone questions and screened the finding as having very low safety significance (Green).

In accordance with Section 6.1.d.3 of Section D.5 of Supplement I to the NRC Enforcement Policy, this violation is categorized as Severity Level IV because the resulting changes were evaluated by the SDP as having very low safety significance (i.e., Green finding).

The inspectors did not identify a cross-cutting aspect associated with the finding because the finding was not representative of current performance.

Enforcement

Title 10 CFR 50.71(e) requires, in part, that the licensee periodically update the USAR originally submitted as part of the application for the operating license to assure that the information included in the USAR contains the latest material developed. Contrary to this, since November 10, 1982, the licensee failed to update the USAR to describe, for each containment penetration, the penetration category, the type of leakage test required, and the applicable leakage test method. Because this violation was of very low safety significance, was not repetitive or willful, and was entered into the licensee's CAP (as CR392286 and CR393475), this violation is being treated as an NCV, consistent with Section 2.3.2 of the NRC Enforcement Policy (NCV 05000305/2010006-02, Failure to Update the Updated Safety Analysis Report to Include Containment Penetration Leakage Testing Information).

The finding is evaluated separately from the traditional enforcement violation and, therefore, the finding is being assigned a separate tracking number. (FIN 05000305/2010006-03, [Failure to Update the Updated Safety Analysis Report to Include Containment Penetration Leakage Testing Information]).

Observations

The inspectors briefly reviewed licensee prioritization of issues as reflected in an issue's assigned due date. While no specific issues were identified, the licensee advised the inspectors that there were approximately 270 items classified as long-term corrective actions. Forty-two of those items were over two years old. Nine of those items were identified as significance level 2 or 1. Many other items, with their assigned due date, will be in excess of three years old when completed. Some items, such as "NFPA 805 Transition Project," had a logical reason for its due date. The inspectors saw from performance indicators that the licensee had a number of long-term corrective actions with three or more deferrals, mostly in actions assigned to corporate engineering.

The inspectors also reviewed the number and status of items in the procedure change request database and the training defect database. Some of the items in those data bases were created from CR issues. Those CRs were closed in the CR database, in accordance with procedures, even though the items were probably not completed or corrected. While no specific issues were identified, the inspectors did note that those databases, in conjunction with open CRs and open work orders, including minor work orders, represented what appeared to the inspectors to be a large backlog of work.

The inspectors also noted that a significant number of Apparent Cause Evaluations (ACEs) that were accessed were downgraded, which was permitted by station procedures under specific conditions. The inspectors did not any identify any issue other than noting the percentage of downgrades.

The inspectors reviewed elements of Kewaunee Power Station's trending program, as well as available trend reports from 2009 and 2010. The inspectors also reviewed Nuclear Oversight (quality assurance) Assessment 10-07-K ("Performance Improvement and Learning"). That assessment concluded that "while the station trend program is providing statistical data, NOD (Nuclear Oversight Department) could not identify

tangible improvements as a result of the station trending program.” The assessment noted that 52 of the 58 potential adverse trend CRs were closed due to no adverse trend, no further action required, or closed to action already in progress as a result of the deficiency being previously identified by some other process. From interviews, the inspectors found that the trend coordinator has started the practice of independently reviewing 10 percent of the low level corrective actions (CAs) that were closed out and found several that required additional work to address the original CA cause. Closeout of CAs without addressing the original issue was an observation from the previous PI&R team inspection. The current inspection team did not identify any discrepancies in the site’s trending program.

(3) Effectiveness of Corrective Actions

In general, the licensee’s corrective actions for the samples reviewed were appropriate and appeared to have been effective. While the licensee identified in CRs several recurrences of issues, the inspectors did not identify any new issues of significance.

Findings

No findings were identified.

Observations

The inspectors reviewed numerous CRs and the associated CAs. Where either sufficient time had elapsed and/or the licensee had performed effectiveness reviews, the inspectors also looked at the effectiveness of the corrective actions. The inspectors did not identify any recurrence of issues beyond those identified by the licensee. However, while sampling corrective actions associated with CRs on previous NRC findings, the inspectors identified an instance of an ineffective evaluation and consequently ineffective corrective actions. The associated NCVs were discussed in the previous section of this report.

In reviewing the CRs, the inspectors had similar issues as the previous PI&R inspection team in following the trail of CRs and supporting documents. For many CRs, the inspectors had to use multiple links and on occasion, discussion with licensee personnel, to determine that an issue had been adequately addressed. In some cases, the plant staff that initially discussed the item with the inspectors had to talk with other staff to clarify the issues with the inspectors.

An example of this difficulty was the resolution of NCV 05000305/2007006-20, “Inadequate Screen-House Ventilation Damper Maintenance.” This issue was identified by the NRC during the 2007 component design basis inspection. During that inspection, the licensee generated CAP042281 to capture the NRC’s concerns related to station blackout operation coping even though the violation was written against the Maintenance Rule (10 CFR 50.65(b)(2)). A condition evaluation (CE19955) was generated to evaluate the coping strategy but did not state that anything was done to address the NCV. That condition evaluation referred to CA30854, which determined that no additional actions were required. The licensee issued another CR (CR14343) that captured receipt of the NCV and referred back to CAP042281 but did not resolve the underlying issue. The licensee ultimately determined in CR22492 that CAP042281 did

not adequately address the NCV and included CA19541, which added the closing function of the screenhouse dampers to be monitored under the Maintenance Rule.

The inspectors noted that for NRC findings there may be as many as four CRs originated to capture the issue. The licensee stated that they had plans to address this issue and reduce this to no more than about two for NRC issues. The licensee also explained that multiple documents potentially issued for a single issue was a design nuance of their system and processes. The licensee noted that their CR system incorporated a parent-child relationship between CRs and actions which could result in numerous documentation paths for one issue. Also, other CRs and actions, if relevant to an issue, could be linked within the CR system to facilitate a complete picture of an issue. When reviewing and printing documents for review, the licensee stated that all relevant documents may not be printed if there were embedded links to other CRs.

.2 Assessment of the Use of Operating Experience

Inspection Scope

The inspectors reviewed the licensee's Operating Experience (OE) program. Specifically, the inspectors reviewed implementing operating experience program procedures, attended CAP meetings to observe the use of OE information, and reviewed completed evaluations of OE issues and events. The inspectors' review was to determine whether the licensee was effectively integrating OE experience into the performance of daily activities, whether evaluations of issues were proper and conducted by qualified personnel, whether the licensee's program was sufficient to prevent future occurrences of previous industry events, and whether the licensee effectively used the information in developing departmental assessments and facility audits. The inspectors also assessed if corrective actions, as a result of OE experience, were identified and effectively and timely implemented.

Assessment

The inspectors concluded that the station appropriately considered industry and NRC OE information for applicability, and used the information for corrective and preventative actions to identify and prevent similar issues. The inspectors assessed that OE was appropriately applied and lessons-learned were communicated and incorporated into plant operations. In particular, OE information was discussed during Plan of the Day meetings and also incorporated into the work management process as part of pre-job briefs. The inspectors also observed that Dominion fleet internal OE and industry OE were discussed by licensee staff to support review activities and CAP investigations.

Findings

No findings were identified.

.3 Assessment of Self-Assessments and Audits

The inspectors assessed the licensee staff's ability to identify and enter issues into the CAP, prioritize and evaluate issues, and implement effective corrective actions through efforts from departmental assessments and audits.

Assessment

The inspectors concluded that self-assessments and audits were typically accurate, thorough, and effective at identifying issues and enhancement opportunities at an appropriate threshold level. The inspectors concluded that these audits and self-assessments were completed by personnel knowledgeable in the subject area. In many cases, these self-assessments and audits had identified issues that were not previously recognized by the station.

Findings

No findings were identified.

.4 Assessment of Safety-Conscious Work Environment

Inspection Scope

The inspectors assessed the licensee's safety-conscious work environment (SCWE) through the reviews of the facility's employee concerns program implementing procedures, discussions with coordinators of the employee concern program, interviews with personnel from various departments, and reviews of issue reports. The inspectors also reviewed the results from a 2008 Safety Culture Survey and partial results from a recently completed 2010 Safety Culture Survey.

The inspectors interviewed approximately 30 individuals from various departments to assess their willingness to raise nuclear safety issues. The individuals were selected to provide a distribution across the various departments at the site and included long-term contractors. The sample was of individuals predominantly at first-line supervision and below first-line supervision. In addition to assessing individuals' willingness to raise nuclear safety issues, the interviews also addressed the changes in the CAP and plant environment over the past two years. Other items discussed included:

- knowledge and understanding of the program;
- effectiveness and efficiency of the program;
- willingness to use the program;
- management's support of the program;
- feedback on issues raised; and
- ease of input to the system.

Assessment

Interviews indicated that licensee has an environment where people were free to raise issues without fear of retaliation. Documents provided to the inspectors addressing the 2010 safety culture assessment stated that Kewaunee Power Station maintained a healthy safety culture. From the inspectors' review of the data elements that were provided with that statement, although not disagreeing with the statement, the inspectors could not determine how the data supported the statement. The recent assessment identified four repeat component focus areas from the 2008 assessment. These areas were work control, resources, continuous learning environment, and organizational change management. There were no identified issues in either the 2008 assessment or the current assessment that directly influenced people's willingness to address nuclear

safety concerns. From the inspectors' review of the two assessments, it appeared that while some progress was achieved since the 2008 survey, overall progress was relatively flat, and on a few questions or areas there was some regression.

Findings

No findings were identified.

Observations

While interviewees expressed satisfaction with the CAP, there were two groups, despite licensee efforts, who did not actively write CRs at the craft level. Most of the individuals interviewed from those two groups said that if they had an issue they would talk to their supervisors and many times either they or the supervisor would write a CR. From the interviews, the inspectors concluded that plant staff viewed the processes for identifying and correcting issues as good. Several staff did voice an opinion that low-level issues needed to receive additional attention.

The inspectors' review of SCWE surveys/assessments identified what appeared to be a disconnect between what the surveys were saying and what the plant staff were saying in interviews. The survey assessments have identified issues that plant staff did not mention in interviews. The recent survey instrument indicated that less than 50 percent of survey respondents either agreed or strongly agreed to several positive statements including:

- a high level of trust exists in the organization;
- effective horizontal communication across departments is used to facilitate understanding and workflow; and
- resources are used effectively and there is a balance between assigned work and resources to perform it.

The licensee stated that they also noticed this inconsistency and were developing plans to explore the reasons for the differences. The licensee also reiterated their belief that a healthy safety culture exist at Kewaunee Power Station. They stated that survey respondents indicated nearly unanimous agreement in their ability and willingness to raise a nuclear safety concern. The licensee also stated that only 6 percent of survey respondents disagreed with the statement that management does not tolerate retaliation of any kind for raising concerns.

The licensee also stated that the survey response to the statement concerning trust in the organization was not validated by other reviews. However, the licensee has stated that they initiated actions to investigate the potential for any issue and to ensure any problems regarding trust were resolved. The licensee also stated that the survey areas that received the least positive responses were identified as improvement areas by station management. Those areas, they stated, involved predominantly process-based execution areas such as work management and change management.

4OA6 Management Meetings

Exit Meeting Summary

On September 3, 2010, the inspectors presented the inspection results to Mr. Stephen Scace and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

- M. Aulik, Manager Design Engineering
- J. Arnold, Motor-Operated Valve Engineer
- M. Bernsdorf, Chemistry Supervisor
- H. Fictum, Trending Coordinator
- J. Gadzala, Dominion Licensing
- S. Heironimus, Employee Concerns Program Specialist
- S. Hills, Operating Experience and Self-Assessment Coordinator
- A. House, Operations Trainer
- B. O'Connell, Ventilation System Engineer
- T. Olsowy, Station Root Cause Coordinator
- R. Repshas, Dominion Licensing
- M. Rosseau, Electrical and Instrument and Control Design Supervisor
- T. Schneider, Nuclear Engineer
- M. Sievert, Component Engineer
- J. Stafford, Manager Organizational Effectiveness
- K. Zastrow, Supervisor – Corrective Action

Nuclear Regulatory Commission

- R. Krsek, Kewaunee Senior Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

05000305/2010006-01	NCV	Failure to Correct the Classification of a Containment Isolation Valve
05000305/2010006-02	SL IV NCV	Failure to Update the Updated Safety Analysis Report to Include Containment Penetration Leakage Testing Information
05000305/2010006-03	FIN	Failure to Update the Updated Safety Analysis Report to Include Containment Penetration Leakage Testing Information

Discussed

None.

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

APPARENT CAUSE EVALUATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
000909	KEWA - NRC SRI Proposes Potential NCV with Cross-Cutting Aspects	0
13696	Evaluate Injury From Lead Blanket	04/04/08
13722	Worker in Area Posted As LHRA Without ED	04/19/08
14079	Train A Service Water Pump A2 Breaker Did Not Close	0
14080	Screen House Exhaust Fan B Failed to Operate	0
14080	Screen House Exhaust Fan B Failed to Operate	0
17830	CCW Surge Tank Level Decrease During CC Isolation to RXCP	0
17838	Inappropriate TS LCO Entry with MS-100A Disabled	06/29/09
17846	NCV Regarding Technique for Doing Liquid Penetrant Examinations	0
17856	Unexpected RHR/Cavity Dilution	04/21/10

CORRECTIVE ACTION DOCUMENTS CREATED DURING THE INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
CR391613	2010 PI&R Issue – Responses To Two Corrective Actions Were Swapped	08/17/10
CR391854	2010 PI&R Issue – USAR Inconsistency Identified	08/19/10
CR391992	2010 PI&R Issue – NRC Question Regarding MS-100A/B TS applicability	08/20/10
CR392194	2010 PI&R Issue – Control of Isolation Valves Credited for Mitigating DBAs	08/23/10
CR392267	2010 PI&R Issue – Blowdown Isolation Valves	08/24/10
CR392286	2010 PI&R Issue – Appendix J Testing Requirements Not Transferred to FSAR	08/24/10
CR392724	2010 PI&R Issue – Inadequate Corrective Action Identified During KPS Review of NRC Question	08/27/10
CR393475	2010 PI&R Issue – NRC Potential Violation for 2009 MS-100A NCV Corrective Actions	09/03/10
CR393476	2010 PI&R Issue – NRC URI for Bus 5&6 43 Switch Position Operation in Manual	09/03/10

CORRECTIVE ACTION DOCUMENTS REVIEWED DURING THE INSPECTION

Number	Description or Title	Date
CA029876	CDBI – NRC Concern With Transferring Safety-Related Buses to Alternate Sources	02/19/07
CA029877	CDBI – NRC Concern With Transferring Safety-Related Buses to Alternate Sources	02/19/07
CA030398	CDBI – NRC Concern With Transferring Safety-Related Buses to Alternate Sources	03/09/07
CA030628	CDBI – NRC Concern With Transferring Safety-Related Buses to Alternate Sources (Simulator)	03/20/07
CA031463	Create a Procedure to Load The EDGs Onto Their Buses and Remove the RAT/TAT	04/24/07
CA071771	Evaluate for Department Clock Reset	04/04/08
CA072901	Review Issue With Underground Cable Ground Fault Causing Forced Shutdown For Applicability to KPS	04/17/08
CA073038	Clock Reset for Worker in Area Posted as LHRA	04/19/08
CA074159	ACE 13698 Activity – Revise GNP-01.23.04, ALARA Program Implementation	05/02/08
CA075441	Revise RP-KW-006-114, Televue Operations	05/19/08
CA080289	2008 Outage Lessons Learned – Item #150 HP	08/04/08
CA080293	2008 Outage Lessons Learned – Item #507 HP	08/04/08
CA121081	Bus Transfer onto RAT	08/14/08
CA131564	NRC IN 2009-02, Biodiesel In Fuel Oil Could Adversely Impact Diesel Engine Performance	03/19/09
CA136102	Investigate and Determine the Feasibility of Purchasing and Using Test Equipment	05/13/09
CA137168	Review Licensing Basis Concerning Alignment of One Transformer to Buses 1-5 and 1-6	05/27/09
CA139490	Review Deficiency Issue w/AOP-SW-001 to Determine, Document and Revise, as Necessary, AOP-SW-001	06/24/09
CA140039	Finalize HEP Analysis & Determine if Time Critical Operator Action Training Is Required	07/01/09
CA141146	RP to Convert Crud Burst Control Plan RPJG to Procedure	07/15/09
CA145353	Review NRC IN 2009-14 for Applicability at KPS and Initiate CAs if needed	09/03/09
CA147562	Initiate TPR for Revision to OP-KW-OSP-SI-001, Diesel Generator Automatic Test	10/01/09
CA147563	Perform 4.0 Crew For Breaker 1-503 TAT to Bus 5 Reopened After Being Closed	10/01/09
CA147613	Review Use of Quick Disconnects for AOV Calibrations and Diagnostics	10/01/09
CA150725	Develop Procedure/Process for Controlling Painting of Plant Equipment	10/27/09
CA151755	Compile a Complete List of Containment Isolation Valves	11/05/09
CA151755	Compile a Complete List of Containment Isolation Valves	11/05/09

CORRECTIVE ACTION DOCUMENTS REVIEWED DURING THE INSPECTION

Number	Description or Title	Date
CA152537	Revise Blender Control Procedures and the Reactor Data Manual	11/12/09
CA152539	Develop and Perform Information Sharing	11/12/09
CA152541	Develop and Implement Guidance	11/12/09
CA153946	Evaluate and Make Recommendation to Improve Narrative Logging	11/30/09
CA156929	CR362894: KEWA - 2009 Refueling Lessons Learned	01/06/10
CA156934	2009 Refueling Outage Lessons Learned	01/06/10
CA160129	Present Potential Training Solution to OPS TRB for AC-1	02/10/10
CA161945	RP to Purchase a Tri-Nuke Capable of At Least 600 gpm for Use In The CA	03/03/10
CA164068	Review NOD Focused Assessment – Quality of ACEs	03/26/10
CA165742	Evaluate Operations Human Performance Six Months After Actions Are Completed	04/14/10
CA166414	Review the CR Data for the Last Year in the Area of High Standards	04/20/10
CA70685	Det, Doc, Initiate Actions Upon Completion of Calc C11450 for Voltage Issues	03/19/08
CA85801	Review Previous Recommendations to Determine if Additional Action Required – 2008 Safety Culture Assessment Results	10/07/08
CACC000364	RCE 989 CACC-5 Communicate to Members of the Dom ET Management Team	12/17/09
CACC135	CCA2 – Create and Implement Overhaul Procedures for AOV Control Valves	05/15/09
CAP035236	Condensation Buildup in Fan Coil Units	07/17/06
CAP041804	CDBI – NRC Concern With Transferring Safety-Related Buses to Alternate Sources	02/15/07
CAP042281	Question Regarding Adequacy of Guidance for SBO Coping	05/04/08
CAPR000384	Perform Additional Troubleshooting on TB FCU 1A	08/06/09
CAPR000401	Establish a Program/Process and Interface that Challenges Vendor Information	04/16/09
CCA 000126	Human Performance – Documentation H.2(c)	05/10/10
CE019955	Question Regarding Adequacy of Guidance for SBO	12/19/07
CR375505	EAL Bases Rev for SA2.1 Clarification Never Occurred But Documented as Complete	04/07/10
CR014319	NRC URI 2007-006-03 (CDBI): No Analysis for Out-of-Phase Fast Transfer	06/20/07
CR014343	NRC NCV 2007-006-20 (CDBI): Screen-House Ventilation Damper Maintenance	06/20/07
CR022492	NCV 2007-006-20 Not Being Adequately Addressed	10/15/07
CR0351046	Screenhouse Temperatures Could Drop Below Freezing In Winter Post-Accident	11/12/09

CORRECTIVE ACTION DOCUMENTS REVIEWED DURING THE INSPECTION

Number	Description or Title	Date
CR095676	Review Issue With Underground Cable Ground Fault Causing Forced Shutdown	04/15/08
CR095893	Worker in Area Posted As LHRA Without Electronic Dosimeter	04/17/08
CR097324	Install Bars or Metal Mesh Over Window in DR#321	04/30/08
CR097327	Security Needs to Verify the Gas Level in the Explosive Vapor Detectors (EVD's)	04/30/08
CR097522	Replaced Door# 321 With A Solid Metal Door	05/01/08
CR101671	No Procedural Guidance for Adding Chemicals to Emergency Diesel Generators	06/17/08
CR102916	Sodium Levels Greater Than the Limit for Refueling Water Storage Tank	07/03/08
CR107317	Gas Decay Tank Gas Concentration Is Greater Than the Acceptable Criteria	08/27/08
CR322103	Diesel Fuel Oil Sample Has Flash Point Below SP-10-225 Criteria	02/02/09
CR324805	Turbine Building Basement FCU A Fails to Start	02/26/09
CR327396	NRC IN 2009-02, Biodiesel In Fuel Oil Could Adversely Impact Diesel Engine Performance	03/18/09
CR328335	Procedure SP 10-225 Does Not Adequately Address FME When Sampling EDG Fuel Oil	03/24/09
CR33174	TS Requirements for Steam Line Low Pressure May Not be Met	04/16/09
CR334957	NRC NCV 2009-002-003: Application of Dedicated Operator	08/12/09
CR337970	Current Practice for Fuel Oil Sampling Does Not Match Original Practice	06/11/09
CR340002	Trending to Identify Aggregate Impacts	07/01/09
CR340121	CDBI Item – Clarify AOP-MDS-001 Flooding Areas	07/02/09
CR340135	CDBI-2009 Wrong Valve Used in AOP-MDS-001, Step 41	07/02/09
CR342040	C11450 Did Not Consistently Evaluate 440v Motors for Overvoltage	07/20/09
CR342547	CDBI 2009 Violation – C11450 Did Not Evaluate 440v Motors for Overvoltage	07/24/09
CR349866	Breaker 1-503 TAT to Bus 5 Reopened After Being Closed During OSP-SI-001	09/28/09
CR350543	Inservice Inspection Program NRC Concern	10/02/09
CR351046	Screenhouse Temperatures Could Drop Below Freezing in Winter Post-Accident	10/06/09
CR351923	Unexpected RHR Sample Results	10/10/09
CR352878	Bus 5 De-Energized Momentarily Due to TAT Lockout	10/15/09
CR353530	Unwanted Discharge in Armory	10/20/09
CR365109	Declining Trend in Performance of Long-Term Corrective Actions	01/13/10
CR366627	Calculation C11716 Error in Evaluating Charging Pump Control Circuits	01/27/10

CORRECTIVE ACTION DOCUMENTS REVIEWED DURING THE INSPECTION

Number	Description or Title	Date
CR366865	2010 Mod/50.59 Inspection: Calculation C11716 Extent of Condition Error	01/28/10
CR368704	2010 MOD/50.59 Inspection: NRC Non-Cited Violation with Cross-Cutting Aspect	02/16/10
CR371712	NRC NCV 2009-005-01: Failure to Perform Dye Penetrant Examinations	03/10/10
CR371714	NRC NCV 2009-005-03: Latching Pawl on Bus Tie Breakers Fails to Engage	03/10/10
CR371716	NRC NCV 2009-005-06: CCW Relief Valve and Lift and Surge Tank Level Drop	03/10/10
CR371721	NRC NCV 2009-006-01: Improper Application of 440Vac Rated Motors	03/10/10
CR371728	NRC NCV 2009-006-05: Inadequate Procedure For Battery Room Flooding	03/10/10
CR373437	NRC NCV 2010-007-01: Calc. Methodology Not Representative of Plant Configuration	03/24/10
CR373505	Corrective Action for an Apparent Cause Closed to Another Process	03/24/10
CR375592	Log Entry Review by NOD Finds CR Not Generated For Unexpected Condition	04/08/10
CR379986	1Q2010-Documentation of an Adverse Trend for Human Performance Failure Modes	05/05/10
CR379986	1Q2010 – Documentation of an Adverse Trend for Human Performance Failure Modes	05/05/10
CR384609	NRC NCV 2010-002-03: Incorrect Settings on Differential Relay - Loss of TAT	06/15/10
CR386451	Focus on Four Indicator 15 Long Term Corrective Action with ≥ 3 Extensions – RED	06/30/10
CR389996	QC Inspection Data for the Second Quarter of 2010	08/03/10
CR391859	1Q10 OR Trend Review PII OR.3-8 Human Performance	08/19/10
CR99396	NRC NCV Corrective Action Documentation in CAP Are Not Stand-Alone Records	05/17/08
OEE000631	IN 2009-02 Biodiesel In Fuel Oil Could Adversely Impact Diesel Engine Performance	04/16/09
OEE704	IN09-16 Spurious Relay Actuations Result In Loss Of Power to Safeguards Buses	10/13/09
OEE813	IN09-29 Potential Failure Of Fire Water Supply Pumps To Automatically Start Due to a Fire	02/01/10
OPEX001988	IN 2009-02, Biodiesel In Fuel Oil Could Adversely Impact Diesel Engine Performance	04/16/09
OPEX2445	IN09-14 Painting Activities And Cleaning Agents Render Emergency Diesel Generators And Other Plant Equipment Inoperable	12/22/09

EFFECTIVENESS REVIEWS

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
EFR000049	Determine Overall Effectiveness in Identifying Potential Equipment Issues	08/10/07
EFR000088	EFR-2 RCE 67 Perform Review of Industry Response to NRC Concerns	04/17/08
EFR000235	Determine Overall Effectiveness of RCE 2009-0967: EDG A and B Considered Inoperable	11/05/09
EFR000236	Turbine Building Basement FCU A fails to start	04/08/10
EFR031228	Perform Effectiveness Review of ODM030393	04/14/07
KPS-SA-07-09	Maintenance Rule Program Periodic Assessment	07/25/07
MRE007341	MRE for Breaker Failing to Close	11/24/08
NOA 10-07-K	Performance Improvement and Learning	03/23/10
ODM030393	CDBI – NRC Concern With Transferring Safety-Related Buses to Alternate Sources	03/09/07

PROCEDURES

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
DNAP-1801	Internal Auditing and Oversight	3
GMP-266	Application Procedure for Non QA-1 Coatings	7
OP-KW-AOP-MDS-001	Abnormal Operation of Miscellaneous Drains and Sumps	2
OP-KW-AOP-SW-001	Abnormal Service Water System Operation	5
OP-KW-ARP-47052-E	Screenhouse Air Temp High/Low	1
OP-KW-NOP-CVC-001	Boron Concentration Control	24
OP-KW-OSP-SI-001	Diesel Generator Automatic Test	4
PI-AA-100-1004	Formal Self-Assessments	4
PI-AA-100-1005	Informal Self-Assessments	4
PI-AA-100-1007	Operating Experience Program	3
PI-AA-200	Corrective Action	12
PI-AA-200-2001	Trending	2
PI-AA-300-3001	Root Cause Evaluation	1
PI-AA-300-3002	Apparent Cause Evaluation	2
PI-AA-300-3003	Common Cause Evaluation	0
QP-14.05.02	Quality Surveillances	11

ROOT CAUSE EVALUATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
RCE 2009-0967	EDG A and B Considered Inoperable	04/29/09
RCE 968	OD-160/Degraded Grid Under-voltage Relays	01/28/09

ROOT CAUSE EVALUATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
RCE 970	Turbine Building Fan Coil Unit A Failed to Start	0
RCE 973	Tech Spec Requirement for Steam Line Low Pressure Settings May Not be Met	4/17/09
RCE 989	TAT Lockout	1
RCE 990	Security Weapon Discharge in the Armory	0

SELF-ASSESSMENT REPORTS AND AUDITS

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
	Corrective Action Program – 4 th Quarter 2009 Assessment	01/07/10
	Corrective Action Program – 3rd Quarter 2009 Assessment	10/05/09
	Corrective Action Program – 2nd Quarter 2009 Assessment	07/06/09
	Corrective Action Program – 4th Quarter 2008 Assessment	01/22/09
Audit 08-04	Operations and Kewaunee & Surry Refueling Activities	07/02/08
Audit 09-07	Corrective Action and Independent Review Activities	07/23/09
Audit 10-02	Emergency Preparedness	04/22/10
NOS 10-07-K	Performance Improvement and Learning	03/23/10
SAR1017	Package Readiness and Content	06/29/10
SAR253	System Engineering	10/15/08
SAR253	System Engineering	10/15/08
SAR347	Formal Self-Assessment – Mock PI&R Inspection	05/02/08
SAR402	Self Assessment of the Operating Experience Program	02/26/09
SAR420	NRC Inspection Readiness Review/Baseline Compliance Review	06/23/08
SAR424	Informal Self-Assessment - Implementation of WinCDMS or OpenCDM	02/19/09
SAR469	Kewaunee Power Station Maintenance Rule (a)(3) Formal Self-Assessment	02/06/09
SAR493	Review of All Security-Related NRC Baseline Inspection Procedures Versus Current Protection Services Processes	04/08/08
SAR498	Assessment of Selected Corrective Action Program Activities	06/26/08
SAR512	Kewaunee Safety Culture Assessment 2008	09/23/08
SAR714	Evaluation of New Employee Training (Chemistry)	05/21/09
SAR715	KPS Readiness Self-Assessment	03/12/10
SAR717	Equipment Reliability Program Effectiveness	07/21/10
SAR726	Informal Self-Assessment – Operability Determination	08/14/09
SAR740	Problem Identification & Resolution Self-Assessment	04/22/10
SAR761	Informal Self-Assessment – Training Dept. Use of Corrective Action Program	01/08/09
SAR864	Initial Licensed Operator Examination Issues	05/27/09

MISCELLANEOUS DOCUMENTS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Proposed Kewaunee Technical Specification Amendment No. 23	01/04/77
	Proposed Kewaunee Technical Specification Amendment No. 52	11/10/82
	USAR Table 5.2-3: Reactor Containment Vessel Penetrations	22
	USAR Table 5.2-3: Reactor Containment Vessel Penetrations	22.01
	Current Status USAR Pages for Section 5	07/01/87
	Trend Report, Kewaunee, 1 st Quarter 2010	
	Spreadsheet of Open Long-Term Corrective Actions	08/30/10
	Overview Report – 1Q2010 QC Inspection Data Analysis	
	Overview Report – 2Q2010 QC Inspection Data Analysis	
	Spreadsheet of Open Procedure Change Requests	Aug2010
	Meeting Minutes – Quarterly OR Trend Review	05/10/10
	Open Training Defects Report	08/18/10
	ECP Review – 2 nd Quarter 2010	
	ECP 1stQuarter Statistical Summary	04/30/10
	ECP End of 2009 Statistical Summary	01/28/10
	2010 Culture Survey Questions - Final	
	Quality Surveillance Reports #s 223, 239, 245, 269, 271, 282, 283 ,284, 285, 288, 289	Various
9068-K	Nuclear Safety or Quality Concern Resolution Follow-Up Summary	01/20/10
9070-K	Nuclear Safety or Quality Concern Resolution Follow-Up Summary	12/28/09
9071-K	Nuclear Safety or Quality Concern Resolution Follow-Up Summary	03/15/10
97-010	USAR Change Request	09/02/97
Calc C11874	Determination of Ramp Acceptance Curves for Steam Pressure Lead/Lag Dynamic Box Calibrations	04/17/09
CM-AA-SAR-101	SAR Change Request for CA159527	06/22/10
DCR 3760	MCC Control Circuit Changes to Improve Required Voltage	0
DCR 3763	Screenhouse Exhaust Fan A Control Circuit Changes	0
ECP 2010-002	Work Environment Assessment – Nuclear Training	07/07/10
NRCNI – 362.1	Adequacy of Station Electric Distribution Systems Voltages	10/11/79
OD 000160	Evaluation for Reliance On Minimum Switchyard Voltage	05/03/08
OD 000254	Support Operability of Degraded Grid Undervoltage Relays	01/29/09
OD/RAS Periodic Review	OD-254 / Support Operability of Degraded Grid Undervoltage Relays	08/25/09
RFT030629	CDBI – NRC Concern With Transferring Safety-Related Buses to Alternate Sources (Training)	03/20/07

DRAWINGS

Number	Description or Title	Revision
E -240	Circuit Diagram 4160V & 480V Power Sources	AW
E-3137	Plan & Sections – Underground Conduit Run From Screenhouse to Diesel Room	F
E-351	Plan & Sections Underground Conduit-Trans. Area	J
Fig. 8.2-6	Interlock Diagram – Diesel Generator Electric Systems	24
OP-KW-NOP-EHV-001	4160V AC Supply and Distribution System	4

LIST OF ACRONYMS USED

ACE	Apparent Cause Evaluation
ADAMS	Agencywide Document Access Management System
CA	Corrective Action
CACC	Corrective Action for Contributing Cause
CAP	Corrective Action Program
CAPR	Corrective Action to Prevent Recurrence
CE	Condition Evaluation
CFR	Code of Federal Regulations
CR	Condition Report
FSAR	Final Safety Analysis Report
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	Inspection Report
IST	In-Service Testing
MSIV	Main Steam Isolation Valve
NCV	Non-Cited Violation
NRC	U.S. Nuclear Regulatory Commission
OE	Operating Experience
PARS	Publicly Available Records System
PI&R	Problem Identification and Resolution
QSR	Quality Surveillance Report
RAI	Request for Additional Information
RCE	Root Cause Evaluation
RCS	Reactor Coolant System
SCWE	Safety-Conscious Work Environment
SDP	Significance Determination Process
SL	Severity Level
TDAFP	Turbine-Driven Auxiliary Feedwater Pump
TS	Technical Specification
USAR	Updated Safety Analysis Report

D. Heacock

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of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region III, and the NRC Resident Inspector at the Kewaunee Power Station.

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Sincerely,

/RA/

Michael A. Kunowski, Chief
Branch 5
Division of Reactor Projects

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Letter to D. Heacock from M. Kunowski dated October 14, 2010

SUBJECT: KEWAUNEE POWER STATION – NRC PROBLEM IDENTIFICATION AND
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