

June 16, 2000

EA-00-15

Mr. Mark L. Marchi
Site Vice President
Kewaunee Plant
Wisconsin Public Service
Corporation
Post Office Box 19002
Green Bay, WI 54307-9002

SUBJECT: KEWAUNEE INSPECTION REPORT 50-305/2000007(DRP) AND
EXERCISE OF ENFORCEMENT DISCRETION

Dear Mr. Marchi:

On May 22, 2000, the NRC completed an inspection at your Kewaunee Nuclear Power Plant. The results of this inspection were discussed on May 24, 2000, with Mr. K. Hoops and other members of your staff. The enclosed report presents the results of that inspection.

This inspection was an examination of activities conducted under your license as they relate to reactor safety, event followup, and compliance with the Commission's rules and regulations and with the conditions of your license. Within those areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel.

The NRC identified three issues that were evaluated under the risk significance determination process and were determined to be of very low significance (Green). These issues have been entered into your corrective action program, as appropriate, and are discussed in the summary of findings and in the body of the attached report. Of the three issues identified, two were determined to involve a violation of NRC requirements. However, one of the violations was not cited due to the very low safety significance of the issue. If you contest this Non-Cited Violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, Region III; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Kewaunee facility.

The remaining violation was the subject of a request for technical assistance from Region III to the Office of Nuclear Reactor Regulation. The response to the technical assistance request is enclosed. In accordance with the response, the NRC is exercising enforcement discretion in accordance with Section VII.B.6 of the Enforcement Policy and is not issuing a Notice of Violation for a potential Severity Level IV violation involving a failure to test reactor coolant

system pressure isolation valves in accordance with Technical Specifications. Discretion was warranted because of a potential lack of clarity in the requirement.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available **electronically** for public inspection in the NRC Public Document Room **or** from the *Publicly Available Records (PARS) component of NRC's document system (ADAMS)*. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Melvyn N. Leach, Chief,
Reactor Projects Branch 2

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

- Enclosures:
1. Inspection Report
50-305/2000007(DRP)
 2. Closeout of Task Interface Agreement 99-029, Kewaunee Testing of Pressure Isolation Valves Prior to Reaching Cold Shutdown Mode

cc w/encls:

- K. Weinbauer, Manager, Kewaunee Plant
- B. Burks, P.E., Director, Bureau of Field Operations
Chairman, Wisconsin Public Service Commission
State Liaison Officer

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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

Report No: 50-305/2000007(DRP)

Licensee: Wisconsin Public Service Corporation

Facility: Kewaunee Nuclear Power Plant

Location: N 490 Highway 42
Kewaunee, WI 54216

Dates: April 2 through May 22, 2000

Inspectors: J. Lara, Senior Resident Inspector
Z. Dunham, Resident Inspector
P. Krohn, Resident Inspector, LaSalle
M. Kurth, Resident Inspector, Duane Arnold

Approved By: Melvyn N. Leach, Chief
Reactor Projects Branch 2
Division of Reactor Projects

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

| Reactor Safety | Radiation Safety | Safeguards |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| <ul style="list-style-type: none">● Initiating Events● Mitigating Systems● Barrier Integrity● Emergency Preparedness | <ul style="list-style-type: none">● Occupational● Public | <ul style="list-style-type: none">● Physical Protection |

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW, or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and

increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

SUMMARY OF FINDINGS

Kewaunee Nuclear Power Plant NRC Inspection Report 50-305/2000007(DRP)

The report covers a 7-week period of resident inspection. The significance of issues is indicated by their color (green, white, yellow, and red) and was determined by the Significance Determination Process in Inspection Manual Chapter 0609.

Cornerstone: Mitigating Systems

- Green. During a walkdown of the containment building, the inspectors identified that portable fire extinguishers were not located in the containment basement at the beginning of the plant refueling outage. Additionally, site fire protection procedures required that responsible fire protection personnel perform inspections of selected plant areas to ensure that the quantity of combustible material was minimized. However, the procedure did not list the containment as an area to be inspected and the procedures did not require the placement and location of portable fire suppression equipment inside containment during the refueling outage. Due to a low number of work activities ongoing at the time, this issue was screened as Green (very low risk significance). (Section 1R05)
- Green. The licensee identified that two Raychem electrical cable splices utilized in environmentally qualified (EQ) safety-related equipment had not been installed in accordance with EQ requirements. These splices were associated with pressurizer level transmitters and were installed in 1984. The licensee subsequently performed extensive EQ testing of the splices to determine the qualification of the splices' as-found configurations. Test results indicated that the splices would have been able to perform their intended function in a harsh environment inside containment. This issue was considered to be of low safety significance based on the successful EQ testing of the as-found splices' configurations and was screened as Green (very low risk significance). One non-cited violation was identified. (Section 1R20.2)
- Green. The NRC determined that the licensee's practice of testing reactor coolant system pressure isolation Valve SI-22B prior to entering the cold shutdown condition was contrary to Technical Specification requirements 4.2.a.3.a. Technical Specification 4.2.a.3.a required that periodic leakage testing of Valve SI-22B be accomplished prior to reaching operating mode after the plant was placed in cold shutdown. This issue was considered to be of low safety significance because of a subsequent successful valve test and was screened as Green (very low risk significance). Enforcement discretion was applied to this item in accordance with Section VII.B.6 of the Enforcement Policy. (Section 4OA4)

Report Details

Summary of Plant Status: The unit operated at approximately 97 percent power until April 22, 2000, when the unit was taken off-line to begin the 2000 refueling outage. The refueling outage continued at the end of this inspection period.

1. REACTOR SAFETY

1R04 Equipment Alignment

.1 Inspection of 'A' Diesel Generator (DG) and Support Systems While 'B' DG Out-of-Service

a. Inspection Scope

On April 15, 2000, the inspectors performed a partial walkdown of the 'A' DG and its associated support systems while the 'B' DG was out-of-service due to the performance of a quarterly surveillance test. The inspectors verified the correct valve position for the 'A' DG air and fuel oil valves using the system piping and instrumentation drawings (P&ID) and system checklist. Instrumentation valve configurations and appropriate meter indications were also observed. The inspectors periodically observed proper installation of hangers and supports, verified operational status of support systems by direct observation of various parameters, observed proper control room switch positions for the system, and discussed abnormal operating procedures with the operators. The inspectors also evaluated other conditions such as adequacy of housekeeping, the absence of ignition sources, and proper labeling.

The inspectors reviewed the following documents:

- N-DGM-10A, "Diesel Generator A Manual Operation," Revision F
- A-DGM-10A, "Abnormal Diesel Generator A Operation," Revision B
- N-DGM-10-CLA, "Diesel Generator A Prestartup Checklist," Revision D
- Updated Safety Analysis Report, Section 8.2.3
- Drawing E-1621, "Integrated Logic Diagram Diesel Generator Mechanical System," Revision AK
- Drawing E-1622, "Integrated Logic Diagram Diesel Generator Mechanical System," Revision V
- Drawing OPM-213-3, "Flow Diagram Station and Instrument Air System," Revision E
- Drawing OPM-213-9, "Flow Diagram Diesel Generator Startup Air Compressor A & B and Fish Screen Air," Revision B
- Drawing OPM-220, "Flow Diagram Fuel Oil Systems," Revision AF

b. Issues and Findings

There were no findings.

.2 Train 'B' of Engineered Safety Features Equipment

a. Inspection Scope

On May 2, 2000, the inspectors performed a partial inspection of Train 'B' engineered safety features systems and components following the loss of normal power to safety-related 4160 Volt Bus 5 (Train 'A'). The Train B components were selected for review since at the time of the event, the 'A' DG was also out-of-service for maintenance.

The inspectors reviewed the following documents as part of this walkdown:

- N-DGM-10-CLB, "Diesel Generator B Prestartup Checklist," Revision F
- N-RHR-34, "Residual Heat Removal System Operation [RHR]," Revision AN

b. Issues and Findings

There were no findings identified.

1R05 Fire Protection

a. Inspection Scope

The inspectors performed walkdowns of various elevations within the auxiliary building (basement, mezzanine, and fan floor), the containment building, and the safeguards alley. These areas were selected due to the extended work activities during the refueling outage. The following documents were reviewed:

- Fire Plan Procedure (FPP) 08-07, "Control of Ignition Sources," Revision D
- FPP 08-08, "Control of Transient Combustibles," Revision A
- FPP 08-12, "Fire Prevention Tour," Revision B
- FPP 08-14, "Fire Protection Shutdown Policy," Original Revision

b. Issues and Findings

The inspectors identified that portable fire extinguishers were not located in the containment basement at the beginning of the plant refueling outage. Other elevations within the containment had portable fire extinguishers near stairways and general access areas. Procedure FPP 08-14 required that responsible fire protection personnel perform inspections of selected plant areas to ensure, in part, that the quantity of combustible material was minimized. However, the inspectors noted that the procedure did not list the containment as an area to be inspected. Additionally, the above procedures did not require the placement and location of portable fire suppression equipment inside containment during the refueling outage. Although work activities had not commenced in the containment building, the inspectors concluded that the lack of procedure requirements resulted in not having fire suppression capability in the containment basement. The inspectors discussed this issue with plant fire protection personnel. After inspector questioning, and subsequent to the end of the inspection period, the licensee entered the issue into the corrective action via Kewaunee

assessment process (KAP) form 00-002170. During the course of the various plant inspections, the inspectors identified no un-safe conditions.

The inspectors used the significance determination process (SDP) to evaluate the risk significance of this issue. The inspectors utilized the Fire Protection SDP to evaluate fire suppression defense-in-depth elements. The lack of a procedural requirement to place fire suppression equipment within containment and the unavailability of portable fire suppression equipment in the containment basement were evaluated under the Phase 1 screening methodology. Due to the low number of work activities at the time of the finding and other fire suppression equipment located in other areas of the containment, these findings were of low safety significance (Green).

1R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors reviewed the licensee implementation of the maintenance rule requirements for the service water system. The service water system was selected based upon recent performance problems and the risk significance classification of the system in the maintenance rule program. The inspectors independently verified the licensee's implementation of the maintenance rule for this system by verifying that the system was properly scoped within the maintenance rule in accordance with 10 CFR 50.65 and that select structures, systems, or components (SSCs) were properly categorized and classified as (a)(1) or (a)(2) in accordance with 10 CFR 50.65. The inspectors also verified that identified issues were identified at an appropriate threshold and entered in the corrective action program.

The service water (SW) system was evaluated, with focus on Valves SW-901-A1, SW-901-B1, SW-901-C1 and SW-901-D1, to determine whether they were properly scoped within the licensee's maintenance rule program. These valves were relied upon to open during a design basis accident to ensure adequate cooling flow to the containment fan coil units and had a recent history of un-predictable performance.

b. Issues and Findings

There were no findings identified.

1R13 Maintenance Risk Assessments and Emergent Work Control

a. Inspection Scope

The inspectors reviewed the licensee's evaluation of plant risk, scheduling, configuration control and performance of planned maintenance during the planned work activities listed below. In particular, the inspectors reviewed the licensee's program for conducting maintenance risk safety assessments and verified the licensee's planning, risk management tools, and the assessment and management of online risk. The inspectors also verified that licensee actions to address increased online risk during these periods, such as establishing compensatory actions, minimizing the duration of the activity, obtaining appropriate management approval, and informing appropriate

plant staff, were accomplished when online risk was increased due to maintenance on risk-significant SSCs. The inspectors reviewed appropriate sections of the USAR and Technical Specifications (TS), and interviewed licensee personnel.

- The inspectors reviewed DCR 3149, Adding an Access Opening in the North Wall of Auxiliary Building. The licensee added the access opening to facilitate replacement of the spent fuel pool heat exchanger during the upcoming refueling outage. This DCR was selected for review based on the impact on safety-related systems such as the steam exclusion and special ventilation systems. Additionally the DCR affected fire protection and security boundaries.
- Eddy-current testing and preventive maintenance of the 'A' and 'B' component cooling water heat exchangers.

b. Issues and Findings

There were no findings identified.

1R14 Personnel Performance During Non-Routine Plant Evolutions and Events

.1 Reactor Shutdown and Cooldown

a. Inspection Scope

On April 21 and 22, 2000, the inspectors observed licensee performance during the unit shutdown and cooldown for the 2000 refueling outage. The inspectors evaluated the performance and interactions between the reactor operators, control room supervisor, and shift supervisor. Additionally, the inspectors evaluated adherence to the licensee's communications and alarm response operations standards.

b. Issues and Findings

There were no findings identified.

.2 Loss of 4160 Volt Electrical Bus 5

a. Inspection Scope

The inspectors observed the licensee's activities in the control room shortly following a loss of the safeguards electrical Bus 5 on May 2, 2000. The inspectors evaluated the performance and interactions between the reactor operators, control room supervisor, and shift supervisor. Based on operator interviews and reviews of operator logs, and computer alarm printouts, the inspectors also evaluated the operators performance in identifying abnormal plant conditions and implementing contingency actions to mitigate the consequences of the event. This event was selected for review since the loss of power to Bus 5 also resulted in the momentary loss of the Train 'A' residual heat removal pump which was providing shutdown cooling. At the time of the event, the reactor refueling cavity was filled and no measurable increase in reactor coolant system

temperature was observed. The inspectors reviewed KAP 00-001276 which the licensee used to enter this event into the corrective action program.

b. Issues and Findings

There were no findings identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed the technical adequacy of operability evaluations (OEs) to ensure that the system operability was properly justified and the system remained available, such that no unrecognized increase in risk occurred.

The inspectors reviewed the following operability evaluations:

- KAP 00-001111, "RC-45B Failure to Open During Shutdown Operation." Valve RC-45B was required to be opened during the venting of the reactor coolant system (RCS) in accordance with operations department procedures.
- KAP 00-000829, "SI-351B Backseat Incident During Motor Operated Valve Testing." Valve SI-351B was opened against the backseat as a result of not removing an electrical jumper during maintenance activities.

b. Issues and Findings

There were no findings identified.

1R16 Operator Workarounds

a. Inspection Scope

The inspectors reviewed operator workarounds (OWAs) to identify any potential affect on the function of mitigating systems, or the operators' ability to respond to an event and implement abnormal and emergency operating procedures.

On April 15 the inspectors reviewed the circumstances surrounding the erratic operation of Valve SW-1306A, a flow control valve which normally automatically controls the component cooling water heat exchanger A outlet temperature. The inspectors evaluated whether the erratic operation created an undue challenge to the plant and control room operators which would constitute an operator workaround. The inspectors interviewed plant operators and reviewed the following documents:

- USAR, Section 9.3.2, "Component Cooling System"
- Operations Department Instruction, "Operator Workarounds," April 22, 1999
- N-CC-31, "Component Cooling System Operation," Revision Q

b. Issues and Findings

There were no findings identified.

1R17 Permanent Plant Modifications

.1 Safety Injection (SI) Relief Valve Design Change

a. Inspection Scope

The inspectors reviewed DCR 2552, "Install SI Pump Suction Relief Valves," associated with the installation of relief valves on the suction piping of the SI pumps. These relief valves were installed to prevent over-pressurization of SI pump suction piping following the switchover from the injection phase to long term recirculation due to check valve back-leakage. The inspectors reviewed the DCR documentation, including the safety evaluation and drawings, and appropriate sections of the USAR.

b. Issues and Findings

There were no findings identified.

.2 DG Jacket Water Cooler Replacement

a. Inspection Scope

The inspectors reviewed the activities associated with replacement of the DG jacket water coolers. The coolers had previously been identified as potentially undersized and susceptible to excessive corrosion. The inspectors conducted interviews with engineering personnel and reviewed DCR 3139, "Diesel Generator Jacket Water Heat Exchanger Replacement," and the associated calculations and safety evaluation.

b. Issues and Findings

There were no findings identified.

1R19 Post-Maintenance Testing

a. Inspection Scope

During post-maintenance testing observations, the inspectors verified that the test was adequate for the scope of the maintenance work which had been performed, and that the testing acceptance criteria was clear and demonstrated operational readiness consistent with the design and licensing basis documents. The inspectors also verified that the impact of the testing had been properly characterized during the pre-job briefing; the test was performed as written and all testing prerequisites were satisfied; and that the test data was complete, appropriately verified, and met the requirements of the testing procedure. Following the completion of the test, the inspectors verified that the test equipment was removed and that the equipment was returned to a condition in which it could perform its safety function.

On May 11 the inspectors reviewed the post-maintenance test activities associated with the replacement of the 'A' DG jacket water coolers as specified by DCR 3139, "Diesel Generator Jacket Water Heat Exchanger Replacement" as well as test activities following the overhaul of the 'B' DG.

b. Issues and Findings

There were no findings identified.

1R20 Refueling and Outage Activities

.1 Plant Shutdown and Refueling Activities

a. Inspection Scope

The inspectors observed work activities associated with the unit refueling outage which began on April 22, 2000. The inspectors assessed the adequacy of operations activities during the plant cooldown, and other outage-related activities such as configuration management, clearances and tagouts, and RCS reduced inventory operations. Additionally, the inspectors also performed reviews and inspections of refueling operations for risk management, conformance to approved site procedures, and compliance with TSs. The following major activities were observed:

- outage planning meetings
- transition to shutdown cooling using RHR
- draining the RCS for midloop operations
- fuel handling activities
- other general outage activities

The following documents were reviewed:

- N-0-04, "35% Power to Hot Shutdown Condition," Revision U
- N-0-05, "Plant Cooldown from Hot Shutdown to Cold Shutdown Condition," Revision AM
- N-RC-36E, "Draining the Reactor Coolant System," Revision Y
- N-RHR-34CL, "Requirements for Entering Reduced Inventory Checklist," Revision E
- Nuclear Administrative Directive-02.07, "Kewaunee Refueling Operations," Revision B

b. Issues and Findings

There were no findings identified.

.2 Electrical Cable Splice Deficiencies

a. Inspection Scope

The inspectors reviewed the licensee's identification of cable splices which were installed in an un-qualified configuration to meet environmental qualification (EQ) requirements.

b. Issues and Findings

Discussion

On May 16, 2000, the licensee identified that several Raychem electrical cable splices utilized in EQ, safety-related equipment located within containment were not installed in accordance with equipment qualification requirements. The most significant non-conforming conditions were associated with the Raychem splices for pressurizer level transmitters 24031 and 24032. The outer heat shrink was not properly shrunk over the breakout legs to ensure an environmentally qualified seal.

The affected splices were originally installed in 1984, and although the splices were shown on plant drawings, various splice walkdowns and inspections performed by the licensee since 1984 had not ensured they were inspected for qualified installation. The licensee initiated Kewaunee Assessment Process Work Requests 00-001604 and 00-001644 to document these splice issues and other examples of lesser safety significance.

Significance Determination Process

The licensee subsequently performed extensive EQ testing of the splices to determine the qualification of the splices' as-found configurations. Test results indicated that the splices would have been able to perform their intended function in a harsh environment inside containment. The inspectors used the SDP to evaluate the risk significance of this issue. This issue was considered to be of minor safety significance based on the successful EQ testing of the as-found splices' configurations. This issue screened out during the Phase 1 evaluation (Green).

Requirements

Criterion V, Instructions, Procedures, and Drawings, of 10 CFR Part 50 required, in part, that activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with those instructions or procedures. General Maintenance Procedure (GMP)-214, "Heat Shrink Splices," Revision E, required that heat shrink splices be installed in accordance with vendor installation instructions and GMP requirements. These documents required the installation of NPKV splice heat shrink material to allow for the outer sleeve to cover the breakout legs to ensure environmental qualification. The failure to follow GMP 214 was identified as a violation of 10 CFR Part 50, Appendix B. However, this Severity Level IV violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A.1

of the NRC Enforcement Policy (NCV 50-305/200007-01, Failure to Install Raychem Heat Shrink Material In Accordance With Procedure Requirements).

1R22 Surveillance Testing

a. Inspection Scope

The inspectors observed surveillance testing on risk-significant equipment and verified that the SSCs selected were capable of performing their intended safety function and that the surveillance tests satisfied the requirements contained in Technical Specifications, the Updated Safety Analysis Report, and licensee procedures. During both surveillance testing observations, the inspectors verified that the test was adequate to demonstrate operational readiness consistent with the design and licensing basis documents, and that the testing acceptance criteria were clear. The inspectors also verified that the test was performed as written and all testing prerequisites were satisfied and that the test data was complete, appropriately verified, and met the requirements of the testing procedure. Following the completion of the test, the inspectors verified that the test equipment was removed and that the equipment was returned to a condition in which it could perform its safety function.

The inspectors observed and reviewed the performance of the following surveillance testing on risk significant equipment:

- SP-02-138, "Service Water Pump and Valve Test - IST," Revision AQ
- SP-05B-283, "Motor Driven AFW Pumps Full Flow Test - IST," Revision J
- SP-34-204A, "SI-22B Leak Rate Measurement," Revision D
- SP-33-297, "Safety Injection to Loop Cold Legs Check Valve Leakage Measurement," Revision B

b. Issues and Findings

There were no findings identified.

4. OTHER ACTIVITIES

OA4 Other

(Closed) Unresolved Item (URI) 50-305/99012-01: Technical Specifications Interpretation for Pressure Isolation Valves

This issue pertained to the licensee's identification that Valve SI-22B had historically been leak tested prior to entering cold shutdown during previous refueling outages. Technical Specification 4.2.a.3.a required that periodic leakage testing of Valve SI-22B be accomplished prior to reaching operating mode after the plant was placed in cold shutdown. Further NRC review of the issue concluded the licensee's practice of testing the valve prior to entering the cold shutdown condition was incorrect. This issue was the subject of a request for technical assistance from Region III to the Office of Nuclear Reactor Regulation. The response to the technical assistance request is include as an

enclosure to the cover letter of this report. In accordance with the response, the NRC is exercising enforcement discretion in accordance with Section VII.B.6 of the Enforcement Policy and is not issuing a Notice of Violation for a potential Severity Level IV violation involving a failure to test reactor coolant system pressure isolation valves in accordance with Technical Specifications. Discretion was warranted because of a potential lack of clarity in the requirement.

The inspectors used the SDP to evaluate the risk significance of this issue. This issue was considered to be of minor safety significance based on the successful leakrate testing of Valve SI-22B (Green).

OA5 Meetings, Including Exit

On May 24, 2000, the inspectors presented the inspection results to the plant manager and members of his staff. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Wisconsin Public Service Corporation

D. Braun, Assistant Plant Manager - Operations
D. Cole, Manager, Assessments
K. Evers, Manager, Nuclear Support Services
K. Hoops, Plant Manager, Kewaunee Plant
G. Harrington, Plant Licensing Supervisor
B. Koehler, Superintendent, Plant Quality Programs
M. Marchi, Vice President - Nuclear
J. Mortonson, Assistant Plant Manager - Maintenance
M. Reinhart, Superintendent, Radiation Protection
J. Schweitzer, Manager, Engineering and Technical Support
J. Stoeger, Superintendent, Operations
T. Webb, Nuclear Licensing Director
K. Weinhauer, General Manager, Kewaunee Plant

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

| | | |
|-------------------|-----|----------------------------------------------------------------------------------------------------|
| 50-305/2000007-01 | NCV | Failure to Install Raychem Heat Shrink Material In Accordance With Procedure Requirements (1R20.2) |
|-------------------|-----|----------------------------------------------------------------------------------------------------|

Closed

| | | |
|-----------------|-----|------------------------------------------------------------------------------|
| 50-305/99012-01 | URI | Technical Specifications Interpretation for Pressure Isolation Valves (4OA4) |
|-----------------|-----|------------------------------------------------------------------------------|

| | | |
|-------------------|-----|----------------------------------------------------------------------------------------------------|
| 50-305/2000007-01 | NCV | Failure to Install Raychem Heat Shrink Material In Accordance With Procedure Requirements (1R20.2) |
|-------------------|-----|----------------------------------------------------------------------------------------------------|

Discussed

None

LIST OF BASELINE INSPECTIONS PERFORMED

The following inspectable area procedures were used to perform inspections during the report period. Documented findings are contained in the body of the report.

| | |
|----------|----------------------------------------------------------------------|
| 71111.04 | Equipment Alignment |
| 71111.05 | Fire Protection |
| 71111.12 | Maintenance Rule Implementation |
| 71111.13 | Maintenance Risk Assessments and Emergent Work Control |
| 71111.14 | Personnel Performance During Non-Routine Plant Evolutions and Events |
| 71111.15 | Operability Evaluations |
| 71111.16 | Operator Workarounds |
| 71111.17 | Permanent Plant Modifications |
| 71111.19 | Post-Maintenance Testing |
| 71111.20 | Refueling and Outage Activities |
| 71111.22 | Surveillance Testing |

LIST OF ACRONYMS USED

| | |
|------|------------------------------------------|
| CFR | Code of Federal Regulations |
| DCR | Design Change Request |
| DG | Diesel Generator |
| DRP | Division of Reactor Projects, Region III |
| EQ | Environmental Qualification |
| FPP | Fire Plan Procedure |
| GMP | General Maintenance Procedure |
| IP | Inspection Procedure |
| IR | Inspection Report |
| KAP | Kewaunee Assessment Process |
| NCV | Noncited Violation |
| NRC | Nuclear Regulatory Commission |
| PDR | Public Document Room |
| RCS | Reactor Coolant System |
| RHR | Residual Heat Removal |
| SDP | Significance Determination Process |
| SI | Safety Injection |
| SP | Surveillance Procedure |
| SW | Service Water |
| TS | Technical Specification |
| URI | Unresolved Item |
| USAR | Updated Safety Analysis Report |