January 17, 2001

Mr. M. Reddemann Site Vice President Kewaunee and Point Beach Nuclear Plants Nuclear Management Company, LLC 6610 Nuclear Road Two Rivers, WI 54241

SUBJECT: KEWAUNEE INSPECTION REPORT 50-305/00-21(DRP)

Dear Mr. Reddemann:

On December 31, 2000, the NRC completed an inspection at your Kewaunee Nuclear Power Plant. The enclosed report presents the results of that inspection, which were discussed on January 4, 2001, with you, Mr. K. Hoops, and other members of your staff.

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

No findings of significance were identified.

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

Sincerely,

Original signed by Roger D. Lanksbury

Roger D. Lanksbury, Chief Reactor Projects Branch 5

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

Enclosure: Inspection Report 50-305/00-21(DRP)

See Attached Distribution

M. Reddemann

cc w/encl: K. Weinhauer, Assistant Site Vice President, Kewaunee Plant D. Graham, Director, Bureau of Field Operations Chairman, Wisconsin Public Service Commission State Liaison Officer January 17, 2000

Mr. M. Reddemann Site Vice President Kewaunee and Point Beach Nuclear Plants Nuclear Management Company, LLC 6610 Nuclear Road Two Rivers, WI 54241

SUBJECT: KEWAUNEE INSPECTION REPORT 50-305/00-21(DRP)

Dear Mr. Reddemann:

On December 31, 2000, the NRC completed an inspection at your Kewaunee Nuclear Power Plant. The enclosed report presents the results of that inspection, which were discussed on January 4, 2001, with you, Mr. K. Hoops, and other members of your staff.

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

No findings of significance were identified.

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

Sincerely,

/s/Roger D. Lanksbury

Roger D. Lanksbury, Chief Reactor Projects Branch 5

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

Enclosure: Inspection Report 50-305/00-21(DRP)

See Attached Distribution

DOCUMENT NAME: G:\KEWA\KEW00-21.WPD

To receive a copy of this document, indicate in the box:"C" = Copy without enclosure "E"= Copy with enclosure"N"= No copy

OFFICE	RIII	RIII		
NAME	Kunowski:dtp	Lanksbury		
DATE	01/ /01	01/ /01		

OFFICIAL RECORD COPY

M. Reddemann

cc w/encl: K. Weinhauer, Assistant Site Vice President, Kewaunee Plant D. Graham, Director, Bureau of Field Operations Chairman, Wisconsin Public Service Commission State Liaison Officer

ADAMS Distribution: DFT JGL1 (Project Mgr.) J. Caldwell, RIII G. Grant, RIII B. Clayton, RIII SRI Kewaunee C. Ariano (hard copy) DRP DRS PLB1 JRK1 BAH3

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: License No:	50-305 DPR-43
Report No:	50-305/00-21(DRP)
Licensee:	Nuclear Management Company, LLC
Facility:	Kewaunee Nuclear Power Plant
Location:	N 490 Highway 42 Kewaunee, WI 54216
Dates:	November 10 through December 31, 2000
Inspectors:	J. Lara, Senior Resident Inspector Z. Dunham, Resident Inspector
Approved By:	Roger D. Lanksbury, Chief Reactor Projects Branch 5

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

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness
- Occupational
- Public

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: <u>http://www.nrc.gov/NRR/OVERSIGHT/index.html.</u>

SUMMARY OF FINDINGS

IR 05000305-00-21, on 11/10-12/31/2000, Nuclear Management Company, LLC, Kewaunee Nuclear Power Plant, Unit 1. Resident Inspector Report.

The inspection was conducted by resident inspectors. There were no findings identified during the inspection.

REPORT DETAILS

<u>Summary of Plant Status:</u> The unit was operated at approximately 96 percent power during the inspection period. From November 18 to 22, 2000, the unit was operated at approximately 74 percent power to facilitate off-site 345 kilovolt line maintenance and to support quarterly scheduled main turbine stop and control valve testing.

1. **REACTOR SAFETY**

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, and Emergency Preparedness

1R01 Adverse Weather Protection

a. <u>Inspection Scope</u>

During this inspection period, the inspectors evaluated and verified the licensee's design features and implementation of procedures to protect mitigation systems from freezing weather conditions. The inspectors conducted walkdowns of the screenhouse and the technical support diesel generator room. Specifically, the inspectors verified that space heaters in those areas were functional and that the areas were adequately protected from freezing conditions. Additionally, the inspectors reviewed the maintenance history of the circulating water (CW) recirculation pump and the technical support diesel generator. Applicable sections of the Updated Safety Analysis Report (USAR) and the following documents were reviewed:

- RCC 417, "Emergency Diesel Generators and Technical Support Center Diesel Generator Cooling Water Sampling, Sample Specifications, and Chemical Addition," Revision B
- PMP 04-03, "CW Recirculating Pump and Circulating Water Chlorine Monitoring Water Pump Maintenance (QA-2)," Revision H
- PMP 67-02, "TSC Building HVAC Equipment QA-2 Fan and Motor Maintenance," Revision F
- ICP 04-10, "CW Recirculating Flow DPI 11654 Calibration," Revision E
- N-CW-04, "Circulating Water System," Revision V
- b. Findings

No findings of significance were identified.

- 1R04 Equipment Alignment
- a. Inspection Scope

During this inspection period, the inspectors conducted a walkdown of the turbine driven auxiliary feedwater (AFW) pump and the "B" motor driven AFW pump and their associated support systems while the "A" motor driven AFW pump was out-of-service for routine surveillance testing. The inspectors verified the correct valve positions using the system piping and instrumentation drawings and the system lineup checklist; observed that instrumentation valve configurations and appropriate pressure and flow meter indications were acceptable; and verified proper installation of hangers and supports, observed proper control room switch positions and local breaker positions for the system, and reviewed abnormal system operating procedures. The following documents were reviewed in addition to applicable system schematic diagrams:

- N-FW-05B-CL, "Auxiliary Feedwater System Prestartup Checklist," Revision AH
- N-MS-06-CL, "Main Steam and Steam Dump Prestartup Checklist," Revision AB
- USAR, Section 6.6, "Auxiliary Feedwater System"
- Technical Specification (TS) 3.4.b, Auxiliary Feedwater System

b. Findings

No findings of significance were identified.

- 1R05 <u>Fire Protection</u>
- .1 Annual Fire Drill
- a. Inspection Scope

On December 3, 2000, the inspectors observed an unannounced fire drill conducted at the facility. The source of the simulated fire was an oil leak on the keep warm oil system of the "B" train diesel generator which then ignited. The inspectors verified that a sufficient number of personnel responded to the simulated fire as the fire team and that fire fighting gear was properly donned. Additionally, the inspectors verified that fire hoses were properly laid out and simulated pressurized, that proper fire fighting techniques were utilized during the drill, and that fire fighting strategies were properly utilized. The inspectors also verified that effective smoke removal operations were simulated. The inspectors observed the licensee's post drill critique.

b. Findings

No findings of significance were identified.

- 2. Area Walkdowns
- a. Inspection Scope

The inspectors performed walkdowns of the following areas:

- AFW pump rooms
- A and B train diesel generator rooms and fuel oil day tank rooms
- A and B train 480 volt safety bus rooms
- Auxiliary building
- Control rod motor generator set equipment room and cable spreading room

The inspectors verified that all observed transient combustibles were being controlled in accordance with the licensee's administrative procedures; that fire hoses were installed at their designated locations; that the physical condition of the hoses was satisfactory and that access to the hoses was unobstructed; and that the passive fire protection features were properly installed and in good physical condition. In addition, the inspectors observed the physical condition of fire detection devices, such as overhead sprinklers, and verified that any observed deficiencies did not impact the operational effectiveness of the system; observed the physical condition of portable fire fighting equipment, such as portable fire extinguishers, and verified the equipment was located appropriately and that access to the extinguishers was unobstructed; and observed the physical condition of passive fire protection features such as fire doors, ventilation system fire dampers, fire barriers, fire zone penetration seals, and fire retardant structural steel coatings.

In addition to the areas inspected, the inspectors reviewed the licensee's testing of fire dampers. The inspectors reviewed PMP 08-22, "FP-Operability Test of Fire Dampers (Fusible Linked Style)," Revision F, and the associated vendor manual.

b. Findings

No findings of significance were identified.

1R06 Flood Protection Measures

- .1 <u>Auxiliary Building and Diesel Generator Rooms</u>
- a. <u>Inspection Scope</u>

On December 18, 2000, the inspectors conducted an inspection of the auxiliary building to assess the overall readiness of barriers and seals which served as flood protection measures. The inspectors verified that floor drains were clear and free from obstructions, that the assumptions and analysis as stated in the licensee's internal flood analysis, "Safe Shutdown Assessment of Internal Flood Levels Due to Postulated Moderate Energy Piping Failures," May 1990, were valid, and that there were no additional flooding sources which the internal flood analysis had not taken into account.

b. Findings

No findings of significance were identified.

- .2 Turbine Building Basement and Screenhouse
- a. Inspection Scope

On December 19, 2000, the inspectors conducted an inspection of the turbine building basement and the screenhouse to assess the overall readiness of barriers and seals which served as flood protection measures. The inspectors verified that floor drains were clear and free from obstructions, that the assumptions and analysis as stated in the licensee's internal flood analysis, "Safe Shutdown Assessment of Internal Flood

Levels Due to Postulated Moderate Energy Piping Failures," May 1990 were valid, and that there were no additional flooding sources which the internal flood analysis had not taken into account. Additionally, the inspectors reviewed PMP 04-02, "CW-CW System Main Steam Condenser Inspection/Cleaning," Revision K, which included a requirement to inspect the exterior of the rubber expansion joints, which connected the discharge piping of the CW pumps to the condenser, for cracking or deterioration which could result in possible leakage.

b. Findings

No findings of significance were identified.

1R07 Heat Sink Performance

a. Inspection Scope

On December 4, 2000, the inspectors observed the licensee conduct performance monitoring on the "B" residual heat removal (RHR) pump pit fan coil unit. The inspectors verified that the test acceptance criteria were acceptable and that the test results met the acceptance criteria. Additionally, the inspectors observed that the testing frequency was sufficient to detect degradation prior to exceeding design basis values and that the test results incorporated test instrument inaccuracies. The inspectors also reviewed Calculation C11037, "The RHR Pump Pits Fan Coil Units Performance Evaluations," Revision 0.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation

a. <u>Inspection Scope</u>

The inspectors reviewed the licensee's implementation of the maintenance rule requirements to ensure that component and equipment failures were identified, entered, and scoped within the maintenance rule and that select structures, systems, or components were properly categorized and classified as (a)(1) or (a)(2) in accordance with 10 CFR 50.65. The inspectors also verified that issues were identified at an appropriate threshold and entered in the corrective action program.

Specific components or system problems evaluated were:

- Auxiliary Building Special Ventilation and Steam Exclusion Trains
- RHR Pump Pit Fan Coil Units
- Main Steam Safety Valves SD-1B1 and SD-1B2 Lift Failures
- Pressurizer Safety Valves PR-3A and PR-3B Lift Failures

The inspectors reviewed various Kewaunee Assessment Process (KAP) documents in addition to the following documents:

- Nuclear Administrative Directive (NAD) 8.20, "Maintenance Rule Implementation," Revision A
- General Nuclear Procedure (GNP) 8.20.1, "Maintenance Rule Scoping and Performance Criteria," Revision A
- GNP 8.20.2, "Maintenance Rule Data Evaluation and Goal Setting," Revision A

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessment and Emergent Work Control

- .1 Configuration Risk Management
- a. Inspection Scope

On December 6, 2000, the inspectors evaluated licensee procedures NAD 8.2, "Work Request/Work Order," Revision D, and GNP 8.21.01, "Risk Assessment for Plant Configurations," Revision A. The licensee had implemented GNP 8.21.01 in order to comply with 10 CFR 50.65(a)(4) which had recently been issued to require that licensees utilize configuration risk management tools to minimize risk to the plant and public prior to conducting risk significant maintenance activities. The inspectors evaluated the licensee's bounding probabilistic risk analysis of NAD 8.2 and GNP 8.21.01. The inspectors utilized the licensee's recently implemented on-line safety monitor to evaluate hypothetical maintenance configurations to ensure that the licensee's procedural controls of risk were conservative. The inspectors also reviewed KAP Work Order (WO) 00-004388 which the licensee had written to document inspector concerns that both NAD 8.2 and GNP 8.21.01 may not bound the licensee's most recent probabilistic risk analysis.

b. Findings

No findings of significance were identified.

- .2 Off-Site 345 Kilovolt Line Maintenance
- a. Inspection Scope

The inspectors reviewed the licensee's evaluation of plant risk, scheduling, and configuration control during planned maintenance associated with an off-site 345 kilovolt transmission line. During the maintenance, the licensee reduced reactor power to approximately 74 percent to minimize the risk of potentially overloading an on-site transformer and a subsequent reactor trip. The inspectors verified that the licensee's planning and management of on-line risk were adequate. The inspectors also verified that licensee actions to address increased on-line risk during these periods were in accordance with approved administrative procedures. The inspectors reviewed USAR, Section 8, "Electrical Systems," TSs, NAD 8.2, "Work Request/Work Order," Revision D, and reviewed the licensee's Individual Plant Examination, Section 5.0, "Core Damage Frequency Quantification."

b. <u>Findings</u>

No findings of significance were identified.

.3 Rod Control Logic Power Supply Failure

a. Inspection Scope

The inspectors reviewed the licensee's evaluation of plant risk, scheduling, and configuration control during emergent work associated with the failure of a 24 volt direct current power supply. This power supply provided a redundant power source for logic control of the rod control system. The inspectors verified that the licensee's planning and management of on-line risk were adequate and that licensee actions to address increased on-line risk during these periods were in accordance with approved administrative procedures. The inspectors reviewed KAP Work Request 00-004609, USAR, Section 7, "Instrumentation and Control," TSs, interviewed licensee personnel, reviewed NAD 8.2, "Work Request/Work Order," Revision D, and reviewed the licensee's Individual Plant Examination, Section 5.0, "Core Damage Frequency Quantification." Additionally, the inspectors observed the replacement of the power supply.

b. Findings

No findings of significance were identified.

- 1R14 Nonroutine Plant Evolutions
- a. <u>Inspection Scope</u>

On November 20, 2000, the inspectors reviewed the licensee's performance during a scheduled surveillance test of the main turbine stop and control valves. 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. Documents reviewed included Surveillance Procedure (SP) 54-086, "Turbine Stop and Governor Valve Operability Test," Revision AC. The inspectors also verified plant equipment operated as designed during the test.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations

.1 Removal of Live Load Packing

a. Inspection Scope

The inspectors reviewed the licensee's controls and evaluations for removing live load packing on Valves SI-7A and SI-7B. These valves were the discharge isolation valves for the safety injection pumps. The technical adequacy of the licensee's documented evaluation for removal of the live load packing was reviewed in addition to the associated work requests and design change package. The inspectors also interviewed licensee personnel and reviewed KAP WO 00-004274. The licensee had written KAP WO 00-004274 to document inspector concerns that following removal of the live load packing on Valves SI-7A and SI-7B, revisions to both an affected drawing and general maintenance procedure to reflect the removal of the live load packing and new body to bonnet torque values had not been implemented approximately 6 months after the completion of the work.

b. Findings

No findings of significance were identified.

- .2 Outstanding and Incomplete 2000 Refueling Outage Leak Checks
- a. Inspection Scope

The licensee identified that the American Society of Mechanical Engineers code examinations, specifically VT2 visual leak check exams, had not been completed for several maintenance activities which had occurred during the 2000 refueling outage 4 months prior. The technical adequacy of the associated operability evaluations was reviewed to ensure that system operability was properly justified and the system remained available, such that no unrecognized increase in risk occurred. The following documents and the licensee's corrective actions to address the missed VT2 exams were also reviewed:

- KAP WO 99-217246
- KAP WO 00-001301
- KAP WO 99-217242
- KAP WO 00-000287

b. Findings

No findings of significance were identified.

.3 Reduced Service Water (SW) Flow Measured During Containment Fan Coil Unit Testing

a. Inspection Scope

The licensee measured reduced SW flow to the "C" and "D" containment fan coil units during routine performance monitoring. The inspectors reviewed the licensee's operability evaluation as documented in KAP 00-004423 to verify the technical adequacy of the evaluation concluding that the "C" and "D" containment fan coil units were operable. The licensee subsequently determined that the reduction in flow was due to an error in the test methodology and performed the test again with satisfactory results.

b. Findings

No findings of significance were identified.

.4 (Closed) Unresolved Item (URI) 305/2000002-02: Potential Undersized Diesel Generator Jacket Water Heat Exchangers.

This URI was opened pending the inspectors review of the licensee's determination of past diesel generator operability considering historical SW inlet temperature. The details of the licensee's review were documented in Licensee Event Report (LER) 305/2000-010-00 (see Section 4OA3.3). The inspectors did not identify any issues of significance during the review.

1R16 Operator Work-Arounds

a. Inspection Scope

The inspectors evaluated whether there were any operator work-arounds which had not been identified by the licensee. On December 6, 2000, the inspectors evaluated whether a failed "A" reactor coolant pump bearing temperature indicator impacted control room operations or event response such that an operator work-around was warranted. The inspectors reviewed the facility's emergency and abnormal operating procedures, interviewed reactor operators, and reviewed applicable portions of the USAR. Additionally, the inspectors reviewed KAP Work Request 00-004451 which documented that the failed instrument had been indicating approximately 30 degrees Fahrenheit lower than normal for over a week prior to control room operators recognizing the discrepancy.

b. <u>Findings</u>

No findings of significance were identified.

1R19 Post-Maintenance Testing

a. Inspection Scope

During post-maintenance testing activities, 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 were 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 the test acceptance criteria were satisfied. Following the completion of the test, the inspectors observed that test equipment was removed and that the equipment was returned to a condition in which it could perform its safety function. Post-maintenance test activities were observed for the following components:

- Bus 1-1 4 Kilovolt Voltage and Frequency Test and Calibration
- Design Change Request 3075, Volume Control Tank Level Transmitter Replacement
- SW Pump 1A2 Strainer Inspection and Lubrication

The inspectors reviewed applicable component drawings and schematics, TSs, and the facility USAR in addition to the following documents:

- SP 39-021A, "Bus 1-1 4KV Voltage and Frequency Test and Calibration," Revision I
- Design Change Request 3075, Volume Control Tank Level Transmitter Replacement
- KAP WO 99-217775
- KAP WO 00-004371
- KAP WO 00-004375
- PMP 02-04, "Service Water System Strainer Inspection, Lubrication and Packing Replacement (QA-1)," Revision M
- b. Findings

No findings of significance were identified.

- 1R22 Surveillance Testing
- a. Inspection Scope

The inspectors observed and reviewed surveillance testing on risk-significant equipment and verified that the equipment was capable of performing its intended safety function and that the surveillance tests satisfied the requirements contained in TSs, the USAR, and licensee procedures. During the surveillance tests, 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 was clear. The inspectors also verified that the test was performed as written and all testing prerequisites were satisfied and that the test data were complete, appropriately verified, and met the requirements of the testing procedure. Following the completion of the test, the inspectors observed that the test equipment was removed and that the equipment was returned to a condition in which it could perform its safety function. The following surveillance testing on risk significant equipment were observed:

- SP 06-077, "Main Steam Safety Valve Test," Revision W
- SP 54-086, "Turbine Stop and Governor Valve Operability Test," Revision AC
- SP 38-102A, "Station Battery BRA 101 Load Test," Revision A

b. <u>Findings</u>

No findings of significance were identified.

1R23 <u>Temporary Plant Modifications</u>

a. Inspection Scope

On November 20, 2000, the inspectors reviewed Temporary Change Request 00-011, Replace Reactor Coolant System Flow Transmitter FT-412. The modification was to replace the transmitter which was manufactured out of cast iron with an aluminum transmitter. The inspectors reviewed the safety evaluation, the seismic and loading evaluations, KAP 00-1175, and KAP 00-1139. The inspectors also reviewed the facility USAR, TS, and Regulation Guide 1.97 "Accident Monitoring Instrumentation."

b. Findings

No findings of significance were identified.

- 1EP6 Drill Evaluation
- a. <u>Inspection Scope</u>

On November 14, 2000, the inspectors observed the licensee's annual on-site emergency preparedness drill. The inspectors observed the licensee's classification and notification of the simulated event, and protective action recommendation development. The inspectors reviewed the following documents:

- Emergency Plan Implementing Procedure (EPIP) AD-02, "Emergency Class Determination," Revision Z
- EPIP AD-04, "KNPP Response to Alert or Higher," Revision AB
- EPIP AD-07, "Initial Emergency Notifications," Revision AL
- EPIP AD-19, "Protective Action Guidelines," Revision P

The inspectors attended and observed the licensee's post drill critique.

b. <u>Findings</u>

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification

.1 <u>Safety System Unavailability - Heat Removal System</u>

Cornerstone: Mitigating Systems

a. Inspection Scope

The inspectors reviewed the licensee's performance indicator data collection process and historical data through the third quarter of 2000. This performance indicator measured the unavailability of the facility's AFW system. The following documents were reviewed:

- NAD-3.18, "NRC Performance Indicators," Revision A
- "Guideline for Data Collection and Reporting NRC Performance Indicators" dated June 22, 2000
- Nuclear Energy Institute 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0
- Reactor Operator and Shift Supervisor Logs
- KAP WO 97-001340

b. Findings

No findings of significance were identified.

4OA3 Event Follow-up

.1 (Closed) Licensee Event Report (LER) 305/2000-007-00: Plugged Recirculation Line from Circulating Water Discharge to Forebay.

The inspectors reviewed the licensee's corrective actions as documented in KAP 00-001781 and LER 2000-007-00. No findings of significance were identified. This event did not constitute a violation of NRC requirements.

.2 (Closed) LER 305/2000-008-00: High Head Recirculation Outside Design Basis of Plant.

The inspectors reviewed the licensee's corrective actions as documented in LER 2000-008-00. The licensee entered the issue into the corrective action program as KAP 00-001776. No findings of significance were identified. This event did not constitute a violation of NRC requirements.

.3 (Closed) LER 305/2000-010-00 and LER 305/2000-010-01: Testing and Evaluation Determine the Service Water System has a Lower Design Basis Temperature Than Previously Believed.

The inspectors reviewed the licensee's corrective actions as documented in LER 2000-010-00, LER 2000-010-01, and KAP 00-001825. No findings of significance were identified. This event did not constitute a violation of NRC requirements.

4OA6 Management Meetings

Exit Meeting Summary

On January 4, 2001, the inspectors presented the inspection results to Mr. M. Reddemann, Mr. K. Hoops, and other members of the Kewaunee 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

Nuclear Regulatory Commission - RIII

R. Lanksbury, Branch Chief, DRP, Branch 5

Nuclear Management Company, LLC

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

ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Opened</u>

None

<u>Closed</u>

50-305/2000002-02	URI	Potential Undersized Diesel Generator Jacket Water Heat Exchangers (1R15.4)
50-305/2000-007-00	LER	Plugged Recirculation Line from Circulating Water Discharge to Forebay (40A3.1)
50-305/2000-008-00	LER	High Head Recirculation Outside Design Basis of Plant (40A3.2)
50-305/2000-010-00 50-305/2000-010-01	LER	Testing and Evaluation Determine the Service Water System has a Lower Design Basis Temperature Than Previously Believed (4OA3.3)

Discussed

None

LIST OF ACRONYMS USED

AFW	Auxiliary Feedwater
CFR	Code of Federal Regulations
CW	Circulating Water
DRP	Division of Reactor Projects, Region III
EDG	Emergency Diesel Generator
EPIP	Emergency Plan Implementing Procedure
GNP	General Nuclear Procedure
KAP	Kewaunee Assessment Process
KNPP	Kewaunee Nuclear Power Plant
LER	Licensee Event Report
NAD	Nuclear Administrative Directive
NRC	Nuclear Regulatory Commission
PDR	Public Document Room
RHR	Residual Heat Removal
SP	Surveillance Procedure
SW	Service Water
TS	Technical Specification
URI	Unresolved Item
USAR	Updated Safety Analysis Report
WO	Work Order