



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

November 1, 2012

Mr. David A. Heacock
President and Chief Nuclear Officer
Dominion Energy Kewaunee, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

**SUBJECT: KEWAUNEE POWER STATION, NRC PROBLEM IDENTIFICATION AND
RESOLUTION INSPECTION REPORT 05000305/2012008**

Dear Mr. Heacock:

On September 28, 2012, the U.S. Nuclear Regulatory Commission (NRC) completed a Problem Identification and Resolution inspection at your Kewaunee Power Station. The enclosed inspection report documents the inspection results, which were discussed at an exit meeting on September 28, 2012, with Mr. A. Jordan and other members of your staff.

The inspection examined 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. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

On the basis of the samples selected for review, the team concluded that, overall, the Corrective Action Program at Kewaunee Power Station was effective in identifying, evaluating and correcting issues. The licensee had a low threshold for identifying issues and entering them into the Corrective Action Program. Issues entered in the Corrective Action Program were prioritized and evaluated based on plant risk and uncertainty. Corrective actions were generally implemented in a timely manner, commensurate with their safety significance. Operating experience was entered into the Corrective Action Program and appropriately evaluated. The use of operating experience was integrated into daily activities and found to be effective in preventing similar issues at the plant. In addition, self-assessments, audits, and effectiveness reviews were found to be conducted at appropriate frequencies with sufficient depth for all departments. The assessments reviewed were thorough and effective in identifying site performance deficiencies, programmatic concerns, and improvement opportunities. On the basis of the interviews conducted, the inspectors did not identify any impediment to the establishment of a safety conscious work environment at Kewaunee Power Station. Licensee staff was aware of and generally familiar with the Corrective Action Program and other station processes, including the Employee Concerns Program, through which concerns could be raised.

Although implementation of the Corrective Action Program was determined to be effective overall, based on the samples reviewed, one finding of very low safety significance (Green) was identified during this inspection. The finding was also determined to involve a violation of NRC requirements. However, because of its very low safety significance and because the issue was entered into your Corrective Action Program, the NRC is treating this as non-cited violation in accordance with Section 2.3.2 of the NRC Enforcement Policy. In addition, the team identified several issues that were either minor in nature and/or represented potential weakness of your program, warranting your attention.

If you contest the subject or severity of a 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 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 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 (PARS) component of the NRC's Agencywide Documents Access and Management 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/

Kenneth Riemer, Chief
Branch 2
Division of Reactor Projects

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

Enclosure: Inspection Report No. 05000305/2012008
w/Attachment: Supplemental Information

cc w/encl: Distribution via ListServ™

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-305
License Nos: DPR-43

Report Nos: 05000305/2012008

Licensee: Dominion Energy Kewaunee, Inc.

Facility: Kewaunee Power Station

Location: Kewaunee, WI

Dates: September 10 through September 28, 2012

Team Leader: R. Ng, Project Engineer

Inspectors: K. Barclay, Resident Inspector
R. Winter, Reactor Engineer
J. Neurauter, Reactor Inspector

Approved by: K. Riemer, Chief
Branch 3
Division of Reactor Projects

Enclosure

TABLE OF CONTENTS

SUMMARY OF FINDINGS	1
REPORT DETAILS	3
4. OTHER ACTIVITIES.....	3
4OA2 Problem Identification and Resolution (71152B).....	3
4OA6 Management Meetings	12
SUPPLEMENTAL INFORMATION	1
KEY POINTS OF CONTACT.....	1
LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED	1
LIST OF DOCUMENTS REVIEWED.....	2

SUMMARY OF FINDINGS

Inspection Report 05000305/2012008; 09/10/2012 – 09/28/2012; Kewaunee Power Station; NRC Problem Identification and Resolution.

This inspection was performed by three region-based inspectors and the Kewaunee Resident Inspector. One finding of very low safety significance (Green) was identified by the inspectors. The finding was determined to involve a Non-Cited Violation (NCV) of NRC requirements. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process." Assigned cross-cutting aspects were determined using Inspection Manual Chapter 0310, "Components Within the Cross-Cutting Areas." Findings for which the Significance Determination Process does not apply may be Green or be assigned a severity level 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.

Identification and Resolution of Problems

On the basis of the samples selected for review, the team concluded that, overall, the Corrective Action Program at Kewaunee Power Station was effective in identifying, evaluating and correcting issues. The licensee had a low threshold for identifying issues and entering them into the Corrective Action Program. Issues entered in the Corrective Action Program were prioritized and evaluated based on plant risk and uncertainty. Corrective actions were generally implemented in a timely manner, commensurate with their safety significance. Operating experience was entered into the Corrective Action Program and appropriately evaluated. The use of operating experience was integrated into daily activities and found to be effective in preventing similar issues at the plant. In addition, the licensee's self-assessments, audits, and effectiveness reviews were found to be conducted at appropriate frequencies with sufficient depth for all departments. The assessments reviewed were thorough and effective in identifying site performance deficiencies, programmatic concerns, and improvement opportunities. On the basis of the interviews conducted, the inspectors did not identify any impediment to the establishment of a safety conscious work environment at Kewaunee Power Station. Licensee staff was aware of and generally familiar with the Corrective Action Program and other station processes, including the Employee Concerns Program, through which concerns could be raised.

Although implementation of the Corrective Action Program was determined to be effective, overall, one finding of very low safety significance (Green) was identified by the inspectors. The finding was also determined to involve non-cited violation of NRC requirements. In addition, the inspectors identified several issues that were either minor in nature and/or represented potential weakness of the program.

A. NRC-Identified and Self-Revealed Findings

Cornerstone: Mitigating Systems

- Green: The inspectors identified a finding of very low safety significance (Green) and an associated non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," because the licensee failed to ensure that the configuration of the safeguards battery racks was in accordance with the design basis Seismic Category I qualification. Specifically, the Seismic Category I qualification specified that the battery rack end rails be snug against the battery. The inspectors found gaps greater than 1/8 inch and up to approximately 3/8 inch. The vendor instructions directed that the rails should be within 1/8 inch. The licensee entered this into the Corrective Action Program as CR489958 and CR487875 and took short term corrective actions to adjust the battery rack end gaps to within 1/8 inch, and assigned an apparent cause evaluation, which was not complete at the end of the inspection period.

The finding was determined to be more than minor because the finding was associated with the Mitigating Systems Cornerstone attribute of protection against external factors and affected the cornerstone objective to ensure the availability, reliability, and Corrective Action Programability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, the licensee failed to ensure that the batteries were constrained from sliding along the rack to avoid over stressing the battery terminals, battery casing, or rack ends. The inspectors determined the finding could be evaluated using the Significance Determination Process in accordance with Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 0609.04, "Initial Characterization of Findings," dated June 19, 2012, and Appendix A, "The Significance Determination Process for Findings At-Power," dated June 19, 2012, Exhibit 2, Mitigating Systems Screening Questions. The inspectors answered "Yes" to question 1, and screened the finding as having very low safety significance (Green). The inspectors did not assign a cross-cutting aspect because the installation of the battery racks occurred in 2008, and was not representative of current performance. (Section 4OA2.1.b.1.ii)

B. Licensee-Identified Violations

None.

REPORT DETAILS

4. OTHER ACTIVITIES

4OA2 Problem Identification and Resolution (71152B)

This inspection constituted one biennial sample of Problem Identification and Resolution as defined by Inspection Procedure 71152, "Problem Identification and Resolution." Documents reviewed are listed in the Attachment to this report.

.1 Assessment of the Corrective Action Program Effectiveness

a. Inspection Scope

The inspectors reviewed the procedures and processes that described the Corrective Action Program at Kewaunee Power Station to ensure, in part, that the requirements of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," were met. The inspectors observed and evaluated the effectiveness of meetings related to the Corrective Action Program, such as the Condition Report Review Team meeting, the Corrective Action Assignment Review Team meeting and the Corrective Action Review Board meeting. Selected licensee personnel were interviewed to assess their understanding of and their involvement in the Corrective Action Program.

The inspectors reviewed selected condition reports across all seven Reactor Oversight Process cornerstones to determine if problems were being properly identified and entered into the licensee's Corrective Action Program. The majority of the risk-informed samples of condition reports reviewed were issued since the last NRC biennial Problem Identification and Resolution inspection completed in September of 2010. The inspectors also reviewed selected issues that were more than five years old.

The inspectors assessed the licensee's characterization and evaluation of the issues and examined the assigned corrective actions. This review encompassed the full range of safety significance and evaluation classes, including root cause evaluations, apparent cause evaluations, and common cause evaluations. The inspectors assessed the scope and depth of the licensee's evaluations. For significant conditions adverse to quality, the inspectors evaluated the licensee's corrective actions to prevent recurrence and for less significant issues, the inspectors reviewed the corrective actions to determine if they were implemented in a timely manner commensurate with their safety significance.

The inspectors selected the Emergency Diesel Generator system to review in detail since the Emergency Diesel Generator system was a risk-significant Maintenance Rule system. The primary purpose of this review was to determine whether the licensee was properly monitoring and evaluating the performance of Maintenance Rule systems through effective implementation of station monitoring programs. A 5-year review of Emergency Diesel Generator issues was performed to assess the licensee's efforts in monitoring for system degradation due to aging. The inspectors also performed walkdowns, as needed, to verify the resolution of issues.

The inspectors examined the results of self-assessments of the Corrective Action Program completed during the review period. The results of the self-assessments were

compared to self revealed and NRC-identified findings. The inspectors also reviewed the corrective actions associated with previously identified non-cited violations and findings to determine whether the station properly evaluated and resolved those issues. The inspectors performed walkdowns, as necessary, to verify the resolution of the issues.

b. Assessment

(1) Identification of Issues

Based on the results of the inspection, the inspectors concluded that, in general, the station was effective in identifying issues at a low threshold and entering them into the Corrective Action Program. The inspectors determined that the station was appropriately screening issues from both NRC and industry operating experience at an appropriate level and entering them into the Corrective Action Program when applicable to the station. The inspectors also noted that deficiencies were identified by external organizations (including the NRC) that had not been previously identified by licensee personnel. These deficiencies were entered into the Corrective Action Program for resolution.

The inspectors determined that the station was generally effective at trending low level issues to prevent larger issues from developing. The licensee also used the Corrective Action Program to document instances where previous corrective actions were ineffective or were inappropriately closed.

The inspectors performed a five year historical review of the emergency diesel generator system. As part of this review, the inspectors interviewed the current and prior emergency diesel generator system engineers, reviewed a sample of emergency diesel generator system health reports, condition reports, operating experience, and an apparent cause evaluation. In addition, the inspectors walked down the emergency diesel generator area to visually inspect recent emergency diesel generator related modifications and to verify that identified concerns were tagged and entered into the Corrective Action Program. The inspectors concluded that emergency diesel generator related concerns were identified and entered into the Corrective Action Program at a low threshold, and concerns were resolved in a timely manner commensurate with safety.

i) Observations:

Untimely Corrective Actions to Restore 10 CFR 50, Appendix R Lighting

The inspectors identified a minor violation of license condition 2.C(3), which required the licensee to implement and maintain, in effect, all provisions of the approved fire protection program as described in the licensee's Fire Plan, and as referenced in the Updated Safety Analysis Report, and as approved through Safety Evaluation Reports dated November 25, 1977, and December 12, 1978, and supplement dated February 13, 1981. The Kewaunee Power Station Fire Protection Plan states that fire protection corrective actions will be identified and addressed in accordance with the Dominion Corrective Action Program. Procedure PI-AA-200, "Corrective Actions," Attachment 6, "Corrective Action Prioritization", would assign a corrective action due date of 180 days for low priority items.

Contrary to the above, from 2007 through 2012, a non-conformance with 10 CFR 50, Appendix R, III, J, "Emergency Lighting," was not corrected. Specifically, the licensee erected scaffolding in the north penetration room in preparations for a permanent modification to provide safe platforms for the operators to access the elevated valves. The initial construction of the scaffold occurred in 2007 and blocked the emergency lighting required by 10 CFR 50, Appendix R, III, J. The inspectors found that the permanent modification was eventually cancelled, due to its complexity and expense, and no corrective actions were created to restore the blocked lighting and compliance with 10 CFR 50, Appendix R. This violation is minor because the licensee had an active fire protection system impairment and had compensatory measures in place, which consisted of having the operators obtain flashlights prior to conducting required actions. The licensee documented this in their Corrective Action Program as CR489875.

ii) Findings:

Battery Rack Configuration Not in Accordance with Design Bases

Introduction: The inspectors identified a finding of very low safety significance (Green) and an associated non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," because the licensee failed to ensure that the configuration of the safeguards battery racks was in accordance with the design basis Seismic Category I qualification. Specifically, the Seismic Category I qualification specified that the battery rack end rails be snug against the battery. The inspectors found gaps greater than 1/8 inch and up to approximately 3/8 inch. The vendor instructions directed that the rails should be within 1/8 inch.

Description: On September 12, 2012, while the inspectors toured the safeguards battery rooms, they observed that the gaps between the batteries and the battery rack rails appeared excessive. The inspectors reviewed the licensee's seismic qualification calculation QR 2268581, Revision 1, "Seismic Qualification Report of 125 Volt DC LCR 25 Batteries, 2 Step Battery Racks & Single Row Spare Cell Rack," and found that it described the battery end rails as "snug to the batteries". The inspectors informed the licensee of their concern, who agreed with the inspectors' observations. The licensee found that the gaps on the Train A battery were within the 1/8 inch vendor requirement. However, gaps on the Train B battery exceeded the vendor requirement. The licensee readjusted the end rails for Train B battery and restored the battery racks to their design basis configuration. The licensee evaluated the as-found condition of the battery racks and determined that the batteries were operable but non-conforming. The inspectors reviewed the work order that replaced the battery in 2008 and found that the work order contained a note and a caution stating the front and end rails should be within 1/8 inch; however, the step to install the rails did not contain any acceptance criteria for end rail installation. The inspectors reviewed the administrative procedure WM-AA-101, "Work Order Planning," and found that the procedure instructed that notes not be used to define limitations or special circumstances governing a job step. The procedure also specified that warnings, caution, and notes, do not contain hidden actions. The inspectors concluded that the acceptance criteria for the battery end rail installation should have been contained in the step itself.

Analysis: The inspectors determined that the failure to ensure that safeguards battery racks were in accordance with its design basis seismic qualification was contrary to 10 CFR Part 50, Appendix B, Criterion III, "Design Control," and was a performance deficiency.

The finding was determined to be more than minor because the finding was associated with the Mitigating Systems Cornerstone attribute of protection against external factors and affected the cornerstone objective to ensure the availability, reliability, and Corrective Action Programability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, the licensee failed to ensure that the batteries were constrained from sliding along the rack to avoid over stressing the battery terminals, battery casing, or rack ends.

The inspectors determined the finding could be evaluated using the Significance Determination Process in accordance with Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 0609.04, "Initial Characterization of Findings," dated June 19, 2012, and Appendix A, "The Significance Determination Process for Findings At-Power," dated June 19, 2012, Exhibit 2, "Mitigating Systems Screening Questions." The inspectors answered "Yes" to question 1, and screened the finding as having very low safety significance (Green). The inspectors did not assign a cross-cutting aspect because the installation of the battery occurred in 2008, and was not representative of current performance.

Enforcement: Title 10 CFR Part 50, Appendix B, Criterion III, "Design Control," requires, in part, that measures shall be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, between October 19, 2007 and April 23, 2008, the licensee failed to translate the safeguards battery rack design basis into procedures and instructions. Specifically, in Work Order 07007948, the licensee did not specify in a job step to place the front and end restraints within 1/8 inch of the battery. Because this violation was of very low safety significance, and the licensee entered it into the Corrective Action Program as CR489958 and CR487875, this violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the NRC Enforcement Policy. The licensee took short term corrective actions and adjusted the battery rack end gaps to be within 1/8 inch, and assigned an apparent cause evaluation, which was not complete at the end of this inspection period. **(NCV 05000305/2012008-01: Battery Rack Configuration Not In Accordance With Design Basis)**

(2) Prioritization and Evaluation of Issues

Based on the results of the inspection, the inspectors concluded that the station was effective at prioritizing and evaluating issues commensurate with the safety significance of the identified issue, including an appropriate consideration of risk.

The inspectors determined that the Condition Report Review Team meeting, the Corrective Action Assignment Review Team meeting and the Corrective Action Review Board meeting were generally thorough and maintained a high standard for evaluation quality. Members of the Corrective Action Review Board discussed the issues

presented in sufficient detail and challenged presenters regarding their conclusions and recommendations.

The inspectors performed a detailed review of issues entered into the Maintenance Rule (a)(1) category covering roughly the past five years. The review included the longest standing (a)(1) issue, a significant structure, system, and components entered (a)(1) status and returned to (a)(2) and a recent (a)(1) entry. The Inspectors reviewed action plans approved by the expert Panel, associated cause evaluations, Maintenance Rule evaluations, and condition reports. The inspectors' noted that the licensee generally showed no reluctance in placing structure, system, and components into Maintenance Rule (a)(1) status. A detailed review of structure, system, and components performance after appropriate corrective actions, addressing preventative maintenance inadequacies or structure, system, and components modifications generally occurred before returning structure, system, and components to (a)(2) status.

The inspectors determined that the licensee usually evaluated equipment functionality requirements adequately after a degraded or non-conforming condition was identified. In general, appropriate actions were assigned to correct the degraded or non-conforming condition.

The inspectors identified two minor violations of licensee's procedures as described in the observations below.

i) Observations:

Assigned Reactivity Event Classification Levels Not In Accordance with Reactivity Management Procedure

The inspectors identified two examples of reactivity management events that were not screened at the significance levels prescribed in procedure OP-AP-300, "Reactivity Management." The inspectors found that one event, which occurred on August 30, 2011, was related to a control rod exceeding its control bank insertion limits for a longer period of time than allowed by the Technical Specifications. The licensee screened the event as a Significance Level 4 event. However, the inspectors reviewed procedure OP-AP-300 and found examples listed under Significance Level 2 event, Item 2.14, "Entry into Reactivity Related TS Action Statement and not Corrected Within TS Time requirements." The inspectors also reviewed the definition of a Significance Level 2 event, which is, "A Reactivity Management Event that places the plant outside of the Design, Analysis, or Licensing Basis or significant events that compromise fuel related limits, or directly result in fuel failure. The licensee made a report for the control rod insertion limit event, per 10 CFR 50.73, for condition prohibited by the plant's Technical Specifications. Therefore, the inspectors concluded that the plant was outside of its licensing basis and the event should have been screened as a Reactivity Significance Level 2 event.

The second example was an unintentional boron dilution that occurred in the 2009 outage, which the licensee reported, per 10 CFR 50.73, as condition prohibited by the plant's Technical Specifications. At the time, the licensee moved fuel after obtaining sample results that showed the boron concentrations were below the minimum requirement. The inspectors were concerned about the incorrect reactivity event

classifications because the reactivity classification determines the condition report significance per procedure PI-AA-200, "Corrective Actions." Condition reports documenting Reactivity Significance Level 2 events should be screened as Significance Level 1 under the Corrective Action Program and would typically receive a root cause evaluation. The inspectors found that the licensee did not screen the condition reports documenting these two examples as Significance Level 1, nor did they perform a root cause evaluation. The licensee entered this into the Corrective Action Program as CR489442.

Condition Report Significance Assignments Inconsistent with Procedure Guidance

The inspectors identified two examples of condition reports where the significance level assigned were inconsistent with procedure PI-AA-200, "Corrective Actions," Attachment 4, "CR Significance Determination." The inspectors found that CR467560, "NRC Question on SR 3.6.3.3," which concluded that the licensee missed a TS surveillance requirement, was assigned a Significance Level 3, instead of a Significance Level 2. The inspectors also identified that CR470789, "Identified Leak on N31/N35 Detector Cable (1RI087R)," which was later determined to be reportable, per 10 CFR 50.73, for any condition prohibited by the plant's Technical Specifications, was assigned a Significance Level 3, instead of a Significance Level 2. The inspectors found that the two examples were both situations where a follow-up evaluation or assessment was needed to conclude whether a missed Technical Specification surveillance or a reportable condition existed. The inspectors found that the licensee's Corrective Action Program did not have a mechanism to reassess a condition report's significance when future follow-up actions concluded that criteria existed that warranted a higher condition report significance level. The licensee entered this issue into the Corrective Action Program as CR489462.

ii) Findings:

No finding was identified.

(3) Effectiveness of Corrective Action

Based on the results of the inspection, the inspectors concluded that the licensee was effective in implementing corrective actions in a timely manner to address identified deficiencies, commensurate with their safety significance, including an appropriate consideration of risk. Problems identified using root or apparent cause methodologies were resolved in accordance with the Corrective Action Program and applicable procedural requirements. Corrective actions designed to prevent recurrence were generally comprehensive, thorough, and timely. The inspectors sampled corrective action assignments for selected NRC documented violations and determined that actions assigned were generally effective and timely.

The inspectors also identified that there were over 2900 open corrective action items at the time of the inspection. More than 180 of these open corrective action items were greater than three years old. The inspectors reviewed a sample of these corrective action items and determined that most of the remaining actions were minor non-conformances or enhancements and the due dates for the actions had been extended a number of times due to resource limitations or other emergent issues. While some of

these action items were considered long term corrective actions by the licensee, they represented a significant increase (more than four times) from what was observed during the last Problem Identification and Resolution Inspection two years ago. The inspectors verified that the sampled condition reports were evaluated and actions assigned appropriately. The inspectors regarded this aging corrective action issue as an improvement opportunity since the outstanding actions, even when some were considered enhancements, could potentially affect the licensee's focus on more important safety issues and complicate resource utilization.

i) Observations:

Untimely Implementation of Corrective Action to Prevent Recurrence

The inspectors identified one example of untimely implementation of corrective actions to prevent recurrence. This subject corrective action to prevent recurrence was to replace 43 high risk service water dead leg piping runs. These actions were being performed to address a service water supply piping leak in 2006 that rendered the "B" emergency diesel generator inoperable and resulted in a unit shutdown.

The licensee determined that the root cause of this event was the failure to implement a robust program to monitor and protect service water dead leg piping. Inadequate program guidance existed for chemical treatment as well as decisions and actions when the inspection program identifies under-deposit corrosion and microbial induced corrosion degradation. Consequently, timely action was not taken to avoid adverse impacts on plant operation.

In November 2007, the licensee developed procedure guidance to identify piping for replacement and created an inspection plan using guided wave inspection technology for these dead leg piping as corrective actions to prevent recurrence. In September 2008, the licensee determined that the guided wave inspection technology was not suitable to detect microbial induced corrosion and there were no reliable methods for detection. The licensee subsequently changed the corrective action to prevent recurrence to replace 43 high risk service water dead leg piping runs preemptively with a target completion date of December 2013.

By December 2010, 15 of the 43 sections of service water piping were replaced. Engineering management at the time concluded that the replacement process was not sufficient and performed a new walkdown to support rescreening of the lines. However, no replacement was performed since December 2010 and no replacement schedule had been approved at the time of the inspection. The licensee stated that this delay was due to turnover in engineering and not presenting the problem and recovery option to the Corrective Action Review Board for revision.

The inspectors determined that the delay in replacing the service water dead leg piping was a missed opportunity for the licensee to address a significant condition adverse to quality in a more timely manner. This was particularly disappointed considering the root cause of the leak was the failure to implement a robust program to monitor and protect service water dead leg piping which led to untimely action to avoid adverse impacts on plant operation. The inspectors determined that this was not a violation of NRC

regulation as the initial timeline for the correction action still could be met. The licensee entered this issue into the Corrective Action Program as CR489877.

ii) Findings:

No finding was identified.

.2 Assessment of the Use of Operating Experience

a. Inspection Scope

The inspectors reviewed the licensee's implementation of the Operating Experience program. Specifically, the inspectors reviewed the Operating Experience program implementing procedures, and completed evaluations of operating experience issues and events. The inspectors determined whether the licensee was effectively integrating operating 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 operating experience information in developing departmental assessments and facility audits. The inspectors also assessed if corrective actions, as a result of operating experience, were identified and implemented in an effective and timely manner.

b. Assessment

Based on the results of the inspection, the inspectors concluded that in general, operating experience was effectively utilized at the station. The inspectors observed that operating experience was discussed as part of the daily and pre-job briefings. Industry operating experience was effectively disseminated across plant departments and no issues were identified during the inspectors' review of licensee operating experience evaluations.

The inspectors reviewed in detail the licensee's evaluation of external operating experience related to laminar cracks identified in the shield building at the Davis-Besse Nuclear Power Station. This was performed due to the extensive degradation of the shield building at Davis-Besse and the similarity of the structure with Kewaunee's shield building. The inspectors reviewed associated external operating experience evaluation documents, a Kewaunee reactor building design drawing, and interviewed Kewaunee engineers that evaluated the operating experience for applicability to Kewaunee. The licensee concluded that the Kewaunee reactor building shield wall is not susceptible to laminar cracking identified at Davis-Besse since there is no inherent stress concentration needed to generate the radial stress magnitude to initiate laminar crack. The inspectors determined the licensee appropriately evaluated external operating experience for Davis-Besse shield building laminar cracking.

c. Findings

No finding was identified.

.3 Assessment of Self-Assessments and Audits

a. Inspection Scope

The inspectors reviewed selected formal and informal self-assessments, root cause effectiveness reviews, and Nuclear Oversight audits. The inspectors evaluated whether these audits and self-assessments were effectively managed, adequately covered the subject areas, and properly captured identified issues in the Corrective Action Program. In addition, the inspectors interviewed licensee personnel regarding the implementation of the audit and self-assessment programs.

b. Assessment

Based on the results of the inspection, the inspectors concluded that self-assessments and audits were typically accurate, thorough, and effective at identifying issues and enhancement opportunities at an appropriate threshold. 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 numerous issues that were not previously recognized by the station. These issues included weaknesses in management oversight of the Corrective Action Program.

c. Findings

No finding was identified.

.4 Assessment of Safety Conscious Work Environment

a. Inspection Scope

The inspectors interviewed selected Kewaunee Station personnel to determine if there were any indications that licensee personnel were reluctant to raise safety concerns, both to their management and the NRC, due to fear of retaliation. In addition, the inspectors discussed the implementation of the Employee Concern Program with the Employee Concern Program coordinators, and reviewed Employee Concern Program activities to identify any emergent issues or potential trends. The inspectors also assessed the licensee's safety conscious work environment through a review of Employee Concern Program implementing procedures, discussions with Employee Concern Program coordinators, interviews with personnel from various departments, and reviews of condition reports. The inspectors also reviewed the effectiveness of the licensee's promotion of the Corrective Action Program and Employee Concern Program. The inspectors reviewed the licensee's safety culture surveys to assess if there were any organizational issues or trends that could impact the licensee's safety performance.

b. Assessment

The inspectors did not identify any issues that suggested conditions were not conducive to the establishment and existence of a safety conscious work environment at Kewaunee Power Station. Licensee staff was aware of and generally familiar with the Corrective Action Program and other station processes, including the Employee Concern Program, through which concerns could be raised. In addition, a review of the types of

issues in the Employee Concern Program indicated that site personnel were appropriately using the Corrective Action Program and Employee Concern Program to identify issues. The staff also indicated that management had been supportive of the Corrective Action Program by providing time and resources for employee to generate their own condition reports.

The staff also expressed a willingness to challenge actions or decisions that they believed were unsafe. All employees interviewed noted that any safety issue could be freely communicated to supervision and safety significant issues were being corrected. Some employees indicated a number of low level items were not being corrected in a timely manner. The inspectors determined that the timeliness of the planned corrective actions for the examples given were commensurate with their safety significance.

c. Findings

No findings were identified.

4OA6 Management Meetings

a. Exit Meeting Summary

On September 28, 2012, the inspectors presented the inspection results to Mr. A. Jordan, 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

A. Jordan, Site Vice President
R. Simmons, Plant Manager
D. Lawrence, Operations Director
J. Stafford, Safety & Licensing Director
S. Yuen, Engineering Director
J. Grau, Maintenance Manager
R. Repshas, Licensing Supervisor
D. Shannon, Radiation Protection Supervisor
K. Zastrow, Organizational Effectiveness Manager
D. Anderson, Nuclear Oversight

NRC

K. Riemer, Branch Chief
R. Krsek, Senior Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

05000305/2012008-01	NCV	Battery Rack Configuration Not In Accordance With Design Basis (Section 4OA2.1.b.1.ii)
---------------------	-----	--

Closed

05000305/2012008-01	NCV	Battery Rack Configuration Not In Accordance With Design Basis (Section 4OA2.1.b.1.ii)
---------------------	-----	--

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.

Condition Reports

CAP032653	Calc Reviews for Containment sump Recirculation	April 4, 2006
CAP039039	RWST Setpoint Changes Proposed Do Not Consider Affect on Calculations	November 2, 2006
CR017882	Evaluate Requirement to Load D/G if Running Unloaded for Extended Time	August 14, 2007
CR016958	Penetration Calculation Between Relay Room and Cable Spreading Room Has Errors	July 31, 2007
CR017520	Results of EDG Tiger Team Assessment	August 8, 2007
CR017520	Results of EDG Tiger Team Assessment	August 8, 2007
CR017882	Evaluate Requirement to Load D/G if Running Unloaded for Extended Time	August 14, 2007
CR018611	Lack of Emergency Lighting for Appendix R Manual Actions	August 24, 2007
CR019727	Maintenance Rule (a)(1) Evaluation – Diesel Generators	September 12, 2007
CR019727	Maintenance Rule (a)(1) Evaluation – Diesel Generators	September 12, 2007
CR020848	50.59 May Be Needed For Scaffold Construction in North Penetration Room	September 25, 2007
CR022459	Turbine Building Service Water Header B Air Accumulator Pressure Low	October 15, 2007
CR040650	RWST Setpoint Changes Proposed Do Not Consider Affect on Calculations	January 16, 2007
CR090910	NRC NCV 2007-011-01: Inadequate Extent of Condition for Fuel Leak	February 11, 2008
CR090910	Inadequate Extent of Condition for Fuel Leak	February 11, 2008
CR092231	NRC raises Concerns about Operability Basis of CR91924	March 3, 2008
CR092231	NRC Raises Concerns about Operability Basis of CR91924	March 3, 2008
CR094687	Corrective Action Program 040650 Place Keeper	April 6, 2008
CR098421	Results of EFR024016 (RCE000726) on Service Water Inspection Program	May 8, 2008
CR111174	NRC URI 2008-003-03: Diesel Generator Siphon Line Not Functioning as Designed	September 25, 2008

CR321056	NRC Informed KPS Both EDGs Are Inoperable	January 23, 2009
CR335070	NRC NCV 2008-005-002: EDG Room Cooling Fan Testing Deficiencies	April 15, 2009
CR337579	2009 INPO AFI ER. 1-2 Circuit Breakers	June 9, 2009
CR339015	45 Gallons of Oil Added to DG "A" after only 15.6 Hours of Operation	June 22, 2009
CR339015	45 Gallons of Oil Added to DG "A" after Only 15.6 Hours of Operation	June 22, 2009
CR340907	Request for Work Order(s) to generated For DCR3754 – North Penetration Platform	July 9, 2009
CR356229	Discrepancies in Containment Purge Fan Flow Rate between Different Documents	November 3, 2009
CR357997	Received TLA-9 (Core Exit TC tilts) and TLA-2 (RCS Subcooling HIGH/LOW)	November 14, 2009
CR357997	Received TLA-9 (Core Exit TC tilts) and TLA-2 (RCS Subcooling HIGH/LOW)	November 14, 2009
CR380584	MA-AA-105, Rev 4, "Scaffolding" contains 10 CFR50.59 Review Deficiencies	May 10, 2010
CR380584	MA-AA-105, Rev 4, "Scaffolding" contains 10 CFR50.59 Review Deficiencies	May 10, 2010
CR381113	NRC URI 2009-005-08 Changes to EAL CU1 and SU5 Debriefed as Potential Violation	May 13, 2010
CR381342	Fire Door 265 Found Propped Open	May 15, 2010
CR381342	Fire Door 265 Found Propped Open	May 15, 2010
CR381701	Chemical Control Procedure, CY-AA-CTL-510 Was Not Implemented As Written	May 19, 2010
CR389292	Different Bases Used in the Tech Spec and ODCM for Radwaste Systems	July 27, 2010
CR389292	Different Bases Used in the Tech Spec and ODCM for Radwaste Systems	July 27, 2010
CR390889	Proposed NRC Violation for Inadequate NRC Approval for Change Made to EALs	August 10, 2010
CR391429	Incomplete Corrective Actions re CR109043	August 16, 2010
CR391985	NRC Identified Violation Concerning Radiation Worker with Cross Cutting Aspect	August 20, 2010
CR391985	NRC Identified Violation Concerning Radiation Worker with Cross Cutting Aspect	August 20, 2010
CR393910	C11723 Minimum Batter Design Voltage Limit Not Properly Applied	September 8, 2010
CR393971	While Restoring Air on W.O. KW100674232 SW-4A Opened	September 8, 2010
CR393971	While Restoring Air on W.O. KW100674232 SW-4A Opened	September 8, 2010
CR396638	2010 KPS Safety Culture Survey Results	September 27, 2010
CR396649	Step Erroneously Marked N/A By Operator During Performance of SP-47-316A	September 27, 2010

CR398265	SI-208 and SI-209 Need to be Added to the Single Point Vulnerability Program	October 7, 2010
CR399711	Incorrect Lubricant Added to Turbine Outboard Bearing on TDAFW Pump	October 19, 2010
CR399711	Incorrect Lubricant Added to Turbine Outboard Bearing on TDAFW Pump	October 19, 2010
CR400976	Engineering DSEM – Procedure Use and Adherence	October 27, 2010
CR400985	Engineering DSEM – Emerging Issues Management	October 27, 2010
CR402383	Impact of DG Start-up Air Compressor Functionality on DG Operability	November 4, 2010
CR403997	While Performing SP-55-155A Page 7 Was Missed	November 17, 2010
CR404991	Engineering DSEM – Declining Trend – DCR Status	November 24, 2010
CR405592	Engineering DSEM – performance Improvement “Peer Review”	November 30, 2010
CR405603	Engineering DSEM – Communication	November 30, 2010
CR407315	CR Zone SV A Has Failed Charcoal Lab Test Results for Radioiodine Test	December 13, 2010
CR407315	CR Zone SV A Has Failed Charcoal Lab Test Results for Radioiodine Test	December 13, 2010
CR407939	Unexpected Voltage found on MOC Switch for 1-504BKR	December 17, 2010
CR408259	Engineering DSEM – Procedure Use and Adherence	December 21, 2010
CR409336	Three Cross-Cutting Aspects in Area of Human Performance – Documentation H.2(c)	January 4, 2011
CR411577	Engineering DSEM – Performance Improvement – PI Analysis	January 26, 2011
CR414092	Potential Degraded Condition Resulting from Fast Transfer	February 16, 2011
CR414560	Engineering DSEM – Performance Improvement – Condition Reporting and Resolution	February 21, 2011
CR414572	Engineering DSEM – Performance Improvement Area – Procedure use and Adherence	February 21, 2011
CR415050	EP Drill Reports Not Filed in Vault as Required	February 25, 2011
CR415074	C11450 R2 Identified Control Circuit Pickup Relays	February 25, 2011
CR415112	C11450 R2 Identifies RCP Starting Restrictions	February 25, 2011
CR415164	C11450 R2 Identifies Potential Overloads from Weld Receptacles	February 26, 2011
CR416884	Stopped DG A and Placed to Pullout Per Step 5.8.17 of OSP-DGE-004A	March 9, 2011
CR418173	AFW-201B Wired Incorrectly	March 18, 2011
CR418537	RCS Drain Down to 60% Pressurizer Level Stopped	March 21, 2011
CR419075	Recommendation from Emergency Preparedness NOD – Audit 11-02	March 24, 2011

CR419235	S-11A Breaker Found ON with Plant in Mode 3	March 24, 2011
CR420986	Core Exit Thermocouple Failed Low during Heatup	April 6, 2011
CR422948	Engineering DSEM – Gap to Excellence – Assertive Engineering and Technical rigor	April 18, 2011
CR427343	Engineering DSEM – Performance Improvement – Operability Determinations	May 16, 2011
CR427344	Engineering DSEM – Performance Improvement – Modification Turnover	May 16, 2011
CR427345	Engineering DSEM – Gap to Excellence – Action Plans for red/Yellow Systems, Components & Programs	May 16, 2011
CR429587	Audit Deficiency: Improper Significance Level Assigned to CRs	June 3, 2011
CR430865	RC-423 Red/Green Indication Indicates Mid Position	June 14, 2011
CR435018	NRC Non-Cited Violations Identified During 6/30/11 NRC Exit Meeting	July 20, 2011
CR435966	Failure to Report medical Condition at Time of NRC License Application	July 28, 2011
CR436673	PNR-4, SN 2234 Found Under Responding >20% During Calibration	August 3, 2011
CR438991	Extensions Requested and Approved in CRS BY Same Person	August 23, 2011
CR450684	Two Badges Were Not Deactivated According to Procedure	October 31, 2011
CR451698	Breaker 1-603 (D/G B Output Breaker) Closed Unexpectedly	November 7, 2011
CR451698	Breaker 1-603 (D/G Generator B Output Breaker) Closed Unexpectedly	November 7, 2011
CR453295	Changes to OP Procedures OP-KW-OSP-DGE-003A & B and OP-KW-OSP-DGE-004A & B	November 18, 2011
CR453295	Changes to Operating Procedures OP-KW-OSP-DGE-003A & B and OP-KW-OSP-DGE-004A & B	November 11, 2011
CR453612	TI 2515/177 NRC Inspection - Procedure Attachment/Graph Incorrect	November 21, 2011
CR456666	Level 1 Personnel Contamination Event	December 19, 2011
CR458126	Some Significance Level 2 Actions Are Not Being Reviewed By CARB As Required	January 5, 2012
CR460168	Place OP-KW-OSP-TAV-002A&B on Admin Hold	January 24, 2012
CR463265	EDG A Vent Damper Air Supply Leakage	February 19, 2012
CR463434	Engineering DSEM – Gap to Excellence – CA Timeliness	February 20, 2012
CR463936	10CFR50.54(q) Program Evaluation and Effectiveness review Not Performed Requirement	February 24, 2012
CR463976	Review Outstanding KPS Appendix R Issues Due to LAR 250 (NFPA 805) Withdrawal	February 24, 2012
CR466479	Received TLA-11 (Reactor Thermal Power High) for 15 Min Average at 1772 Mwth	March 16, 2012
CR466854	Engineering DSEM – Gap to Excellence – Operability Determinations	March 19, 2012

CR466856	Engineering DSEM – Gap to Excellence – Appendix R Resolution	March 19, 2012
CR466858	Engineering DSEM – Performance Improvement – Configuration Management and Design Control	March 19, 2012
CR467353	Security Procedures Need Updating	March 22, 2012
CR467365	NOD Audit 12-02: Emergency Preparedness (Recommendation)	March 22, 2012
CR46956 7	Oil Leak on Diesel Generator B Lube Oil Cooler	April 7, 2012
CR472811	QC Hold Point Missed during Work Activity	April 29, 2012
CR474251	Engineering Gap to Excellence – ACE Quality	May 8, 2012
CR476483	SAR 1934 - PI&R - Sig Level and CARB Review not added after Revision	May 24, 2012
CR476511	SAR 1934 - PI&R - Inappropriate Closure of a Corrective Action	May 24, 2012
CR476569	SAR 1934 - PI&R TSC EDG KVAR Erratic Response	May 25, 2012
CR477079	Incorrect Motor Untermid	May 30, 2012
CR479377	IER L3-12-49, Man Scram Caused By a Weakness In The Single 0-Pt Vulnerability	June 20, 2012
CR481178	Worker With Expired Rad Worker Qual Performed Work in RCA	July 9, 2012
CR481430	Can Not Measure CO2 at Levels Necessary to Evaluate EAL HA3.1	July 11, 2012
CR481556	Inadequate Compensatory Measure	July 12, 2012
CR482401	Received TLA-11, Rx Thermal Power High	July 20, 2012
CR485962	CARB Rejection of ACE 19163	August 24, 2012
CR487342	ANI Inspector Concerned with Rad Material Storage in 'B' SGR Building	September 7, 2012
CR487875	NRC Identified Gaps Between the Battery Cells and the End Rails on BRA and BRB 101	September 12, 2012

Corrective Action Documents

CA014043	CA to Eng recovery to Revise Calculation C11101	August 1, 2007
CA016112	CA to Eng to Resolve Lack of 8-Hour Battery-Powered Emergency Lighting	August 28, 2007
CA018152	CA to Rapid Response Engineering to Complete 50.59 Evaluation for Scaffolding	September 28, 2007
CA021357	CA to Component Engineering to Track Removal of Exhaust Ports	October 15, 2007
CA023828	Champion the Modification Request for Installing Catwalks in North Penn Room	May 18, 2009
CA023976	Track Completion of Repair to SW-301B	May 30, 2006
CA023977	CAPR – Upgrade SW Inspection and Mitigation Plan	May 30, 2006

CA023978	CAPR – Prepare GL-89-13 Gap Analysis to Actions I and III	May 30, 2006
CA023979	CAPR – Prepare Annual Inspection Plans	May 30, 2006
CA023984	Determine Why Corrective Action Failed (Ref OTH-1492)	May 30, 2006
CA023985	Reinforce to KPS Staff that Deviations from Procedural and/or Program Requirement Must be Documented in CAP	May 30, 2006
CA023986	Consider Removal of SW Piping Insulation	May 30, 2006
CA023987	Evaluate New Inspection Technologies – Potential for G-Wave UT	May 30, 2006
CA023988	Assess Adequacy of Resources for SW/MIC and Other Engineering Programs	May 30, 2006
CA023988	Improve Execution of Radiography	May 30, 2006
CA023990	Prepare a Pre-Packaged Design for a ASME Code Case N-513-1 Repair	May 30, 2006
CA023991	Complete a Pre-Packaged Design for Non-Code Temporary Repair	May 30, 2006
CA024057	OE Sharing of B SW Supply Line Leak to B Diesel Generator	June 2, 2006
CA024282	Chemical Wet Layup of SW Replaced Deadlegs	June 16, 2006
CA030064	Initiate Solution to RWST Level Instrument Accuracy Issue	February 28, 2007
CA030065	Review the Other IPEOP Setpoint Changes to Determine if Similar Concern are Found	February 28, 2007
CA030066	Update USAR to Explicitly State the RWST Level Setpoints Used in the Safety Analyses	February 28, 2007
CA030067	Cross-Reference the IPEOP Setpoints with Their Inputs and Outputs	February 28, 2007
CA030072	Present Lessons Learned to the CAP Screen Team	February 28, 2007
CA031523	Reference Calculation 404 in the Applicable System Functional Matrices and Design Basis Documents	April 25, 2007
CA071737	T-Track DCR032531 Tracking Action	April 4, 2008
CA074422	T-Track CA023828 Tracking Action	May 5, 2008
CA074977	Publish Inspection Plan from 4 th CAPR (RCE000720)	May 13, 2008
CA084648	Track Completion of Dead Leg Service Water Replacement and Limited Inspection	September 24, 2008
CA140733	CA to Track ACE017635 AC-2 Circuit Breaker Action Plan in CRS	July 10, 2009
CA143420	Complete Refurbishment of 4kV Safety Related Breaker	August 10, 2009

CA151735	CR356229 Discrepancies in Containment Purge Fan Flow Rate between Different Documents: Evaluate if Flow Blockers Used to Remain and Make Recommendations	November 5, 2009
CA151735	CR356229 Discrepancies in Containment Purge Fan Flow Rate between Different Documents: CR356229 Discrepancies in Containment Purge Fan Flow Rate between Different Documents:	November 5, 2009
CA161406	CR356229 Discrepancies in Containment Purge Fan Flow Rate between Different Documents: Track Changes of OPERM-602	February 25, 2010
CA161411	CR356229 Discrepancies in Containment Purge Fan Flow Rate between Different Documents: Revise OCDM Table 2.2	February 25, 2010
CA161413	CR356229 Discrepancies in Containment Purge Fan Flow Rate between Different Documents: Revise SP-32B-116	February 25, 2010
CA161417	CR356229 Discrepancies in Containment Purge Fan Flow Rate between Different Documents: EP to Review and Revise EP Procedures	February 25, 2010
CA169256	CR381113 NRC URI 2009-005-08 Changes to EAL CU1 and SU5 Debriefed as Potential Violation: Determine, Document and Resolve Issue Regarding Potential Decrease in Effect of E-plan	May 19, 2010
CA169517	Determine Requirements, at the Fleet Level, and Update Procedure as Determined Appropriate	May 21, 2010
CA169518	Resolve Issue With Storage Codes	May 21, 2010
CA169519	Resolve Issue with Label Printing Program	May 21, 2010
CA175158	Review and Document the Regulatory Impact of this Situation and Initiate Action	August 2, 2010
CA176144	CR390889 Proposed NRC Violation for Inadequate NRC Approval for Change Made to EALs: Develop Preliminary Causal Analysis and EP Manager to Present Findings to Resident Inspector	August 12, 2010
CA176764	Det. Doc. and Resolve the Closure of CR109043 Without Performing the CA	August 19, 2010
CA176919	CR356229 Discrepancies in Containment Purge Fan Flow Rate between Different Documents: EP to Track Issuance of EAL Technical Basis Revision 7	August 20, 2010
CA178477	INNS Eng to Revise C11723	September 13, 2010
CA178478	INNS Eng to Correct ITS Bases	September 13, 2010
CA178480	INNS Eng to Revise C11724	September 13, 2010
CA178481	Systems Eng to Revise Battery Tests	September 13, 2010
CA179477	Submit FIP's For Affected Ops Procedures, PMP, and GMP	September 22, 2010

CA179478	Revise Affected Operations Procedures Which Have Been Placed On Admin Hold	September 22, 2010
CA180093	KEWA – 2010 Safety Culture Survey Results: Roll-out Department Specific results to Design Engineering Department	September 29, 2010
CA180130	KEWA – 2010 Safety Culture Survey Results: Create Department Specific Action Plan to Address Opportunities for Improvement	September 29, 2010
CA180448	CR390889 Proposed NRC Violation for Inadequate NRC Approval for Change Made to EALs: Revise EP-AA-102	October 1, 2010
CA180449	CR390889 Proposed NRC Violation for Inadequate NRC Approval for Change Made to EALs: Document EP Presentation of Discussion and Lessons Learned	October 1, 2010
CA181287	Det. Doc. and Resolve SI-208 and SI-209 May Need to be Added to the SPV Program	October 11, 2011
CA182375	Eval Adding Incorrect Lubricant as a Station HU Clock Reset per PI-AA-5001	October 21, 2010
CA182377	Eval Adding Incorrect Lubricant as a HU Department Clock Reset	October 21, 2010
CA183072	Track Revision of PMP-33-06 To Incorporate ETE-KW-2010-0007	October 28, 2010
CA183073	Track Revision of GMP-239-A1 To Incorporate ETE-KW-2010-0007	October 28, 2010
CA183158	Engineering DSEM – Procedure Use and Adherence: Review Issues Identified and Benchmark with Site HUDCs and Fleet	October 29, 2010
CA183159	Engineering DSEM – Emerging Issues Management: Determine, Document and Initiate Actions in regards to Managing of Emergent Issues	October 29, 2010
CA184690	Ensure 5% Design Margin is Included in Calc C11723	November 15, 2010
CA186124	Engineering DSEM – Declining Trend-DCR Status: Determine, Document and Resolve with Plan and Initiate Actions	November 30, 2010
CA186527	Engineering DSEM – Performance Improvement “Peer Review:” Briefing Sheet for Peer Reviews	December 3, 2010
CA187553	Evaluate Appropriate Stocking Levels and Submit MMSR As Appropriate	December 15, 2010
CA187554	O&P to Review for Scheduling of Separate Trains of Filter Testing	December 15, 2010
CA187555	Evaluate Margin Issue, Recommend Priority, and Present Priority to Management	December 15, 2010
CA188146	Discuss with the Planner and Design Engineering (CD) the circuitry and Reasoning	December 21, 2010
CA188372	Engineering DSEM – Procedure Use and Adherence: Review Items Listed and Determine Focused Area for Improvement	December 27, 2010
CA188908	Generate a Standing Order to Direct Shift Supervision to Review All Steps Marked	January 5, 2011

CA188909	Supervisor Nuclear Shift Operations to Provide Reinforcement of Section 3.10	January 5, 2011
CA188910	Request for Training on the Interactions Between the Inputs to Steam Generator	January 5, 2011
CA188911	Generate a Standing Order to Set Expectations for Discussing All Operator Actions	January 5, 2011
CA190032	Engineering DSEM – Declining Trend-DCR Status: Engineering Design to Turn Over and Close Out DC 3524 and DC 3525	January 20, 2011
CA190038	Engineering DSEM – Declining Trend-DCR Status: Engineering Design to Turn Over and Close Out DC 3680 – Tritium Sampling	January 20, 2011
CA190046	Engineering DSEM – Declining Trend-DCR Status: Engineering Design to Turn Over and Close Out 3631-2 Spare GSU Pad	January 20, 2011
CA190053	Have Each SRO Perform a Focused Observation of Placekeeping	January 1, 2011
CA190054	Evaluate Procedure Use and Adherence Six Months After Actions are Completed	January 20, 2011
CA190055	Pursue a DLA For The Operations Department in the Area of Placekeeping	January 20, 2011
CA190735	Determine, Document, and Resolve Need For Vendor Manual Updates	January 1, 2011
CA190740	Engineering DSEM – Performance Improvement – PI Analysis: Determine, Document and Resolve Necessary Improvement to Performance Analysis:	January 28, 2011
CA192981	Engineering DSEM – Performance Improvement – Condition Reporting and Resolution: Provide Briefing Material for Engineering in Regards to Procedural Requirements	February 23, 2011
CA192982	Engineering DSEM – Performance Improvement – Condition Reporting and Resolution: Process Request for Training on Engineering Performance Improvement Item - Condition Reporting and Resolution	February 23, 2011
CA193175	Procurement to Brief on the Expectations for Accepting Vendor Letters As Basis	February 25, 2011
CA193176	Procurement To Revise IEE 1000008907 To Remove Acceptability of Standoffs	February 25, 2011
CA193177	Reassess Actions Required To Address CR116535	February 25, 2011
CA193233	EP Drill Reports Not Filed in Vault as Required	February 27, 2011
CA193235	Revise Procedures for RCP Start (Mode 4 Restraint)	February 27, 2011
CA193236	Take Actions as Appropriate for C11450 R2	February 27, 2011
CA193249	Engineering DSEM – Performance Improvement – Condition Reporting and Resolution: Conduct Performance Analysis on Condition Reporting and Resolution	February 28, 2011

CA193283	Det. Doc. and Resolve C11450 R2 Identifies Control Circuit Pickup Delays	February 28, 2011
CA193404	I&C to Track Implementation of Changes to SP-47-316A and SP-47-316D	March 1, 2011
CA193409	Performed Focused Observations Related to PJBs Between Ops and Other Crafts	March 1, 2011
CA193460	Det. Doc. and Initiate Actions as Appropriate for C11450	March 1, 2011
CA195413	I&C to Track Implementation of Changes to SP-47-316A and SP-47-316D	March 22, 2011
CA195808	Consider Revising Program Control for Review of Letters of Agreement	March 26, 2011
CA197240	Engineering DSEM – Procedure Use and Adherence: Training	April 8, 2010
CA198510	Review Actions Developed from ACE18552 and Determine Additional Actions	April 20, 2011
CA199433	Include the Information and Causal Factors Related To This Event Within Outage	April 27, 2011
CA199434	RFT For Utilization of AOP-RCS-002 “Abnormal Refueling Level”	April 27, 2011
CA199435	Reinforce Proper Documentation and Initiation of Condition Reports	April 27, 2011
CA199436	RFT For Recognition and Cause of Gas Formation During Pressure/Temperature	April 27, 2011
CA200266	Initiate a Procedure Change Request for SP-33-297A/B	May 4, 2011
CA200268	Review SP-33-297A/B for Accuracy of Execution in Mode 4	May 4, 2011
CA200269	Conduct a Briefing with Control Room Operators to Reinforce Operations Standards	May 4, 2011
CA201486	Engineering DSEM – Performance Improvement – Operability Determinations: Determine, Document and Resolve Why Service Water System Was Not Discussed in OD-413	May 18, 2011
CA201487	Engineering DSEM – Performance Improvement – Operability Determinations: Include OD-413 and CR423665 as OE for Operability Training	May 18, 2011
CA201488	Engineering DSEM – Performance Improvement – Modification Turnover: Training for Document Approvals Required	May 18, 2011
CA201600	Engineering DSEM – Gap to Excellence – Action Plans for Red/Yellow Systems, Components and Programs: Review Red and Yellow Programs and Ensure the Appropriate Action Plans Are in Place	May 19, 2011
CA201601	Engineering DSEM – Gap to Excellence – Action Plans for Red/Yellow Systems, Components and Programs: Review Red and Yellow Programs and Ensure the Appropriate Action Plans Are in Place	May 19, 2011

CA202253	Engineering DSEM – Performance Improvement – Operability Determinations: Conduct Performance Analysis for Issue Described in CA201487	May 26, 2011
CA202255	Engineering DSEM – Performance Improvement – Modification Turnover: Conduct Performance Analysis for Issue Described in CA201488	May 26, 2011
CA205314	Develop a Dynamic Learning Activity (DLA) / Post Turnover	June 30, 2011
CA205425	Field Training Officers To Conduct A Proper Post Turnover With All Officers	June 30, 2011
CA205429	Perform Dynamic Learning Activity – Post Turnover	June 30, 2011
CA205430	Review of Dynamic Learning Activities	June 30, 2011
CA205431	Effectiveness Review Of Corrective Actions From CCA 198	June 30, 2011
CA206468	Develop and Implement a Requirement For a Multidisciplined Challenge Board	July 14, 2011
CA207312	Perform A Potential Missed Opportunity Evaluation In Accordance With NOD-GL-1	July 22, 2011
CA210827	CA to Update System Trend plans for MR Unavailability as Required	August 29, 2011
CA220421	Evaluate Levels And Submit Changes to the Procedures with the New Graph	November 29, 2011
CA221254	Perform A Potential Missed Opportunity Evalaution in Accordance with NOD-GL-1	December 7, 2011
CA221257	Review Preliminary Cause and Crosscutting Aspect with Licensing or Organization	December 7, 2011
CA221271	Repress DCR-3754”Install Platform in North Penetration Room” Mod to PHWG	December 7, 2011
CA223837	CA to Develop REA to Determine Options for Resolving Issues – Midloop Operation	January 13, 2012
CA225028	Identify Procedures Where Voltage Checks Performed	January 26, 2012
CA225683	Conduct Performance Analysis Using the Performance Analysis/Performance Improvements	February 2, 2012
CA225686	Conduct Performance Analysis Using the Performance Analysis/Performance Improvement	February 2, 2012
CA227610	Engineering DSEM – Gap to Excellence – CA Timeliness: Develop Action Plan to Resolve Gap to Excellence in CA Timeliness	February 22, 2012
CA228015	Determine, Document and Resolve Issue of 10 CFR 50.54(q) Program Evaluation Effect Review	February 28, 2012
CA228092	Engineering DSEM – Gap to Excellence – Appendix R Resolution: Perform Evaluation and Extent of Condition Review of Outstanding 10 CFR 50 Appendix R Issues	February 28, 2012
CA228466	Present Revision to OP-AA-102, Operability Determination, to Remove Section 3.4	March 2, 2012

CA230055	Engineering DSEM – Gap to Excellence – Operability Determinations: Develop Action Plan to Resolve Gap to Excellence in Operability Determinations	March 21, 2012
CA230057	Engineering DSEM – Performance Improvement – Configuration Management and Design Control: Determine Action Plan to Address Performance Improvement Area in Configuration Management and Design Control	March 21, 2012
CA230283	Track Procedure Revision for NOP-RHR-002	March 23, 2012
CA230330	Track Procedure Revision for NOP-RHR-002	March 23, 2012
CA230547	Ops to Evaluate For Missed Surveillance	March 27, 2012
CA230552	Evaluate Procedure Revision Process to Address Procedural Inconsistencies	March 27, 2012
CA230553	Update Security Implementing Procedures 30.04	March 27, 2012
CA230554	Evaluate Establishing Exposure Rate (mR/hr) That Correlates RCS Sample Dose	March 27, 2012
CA231664	Revise LER 2011-005-00 Based on Failure Analysis Report for SBV System Standoff	April 6, 2012
CA231665	Review Repair Report and Update ACE 18531 As Required	April 6, 2012
CA232271	CA to Security to Update Security Implementing Procedures 40.04	April 14, 2012
CA232272	CA to Security to Update Security Implementing Procedure GO-KW-0106	April 14, 2012
CA234766	Engineering DSEM – Gap to Excellence – ACE Quality: Create Action Plan to Address ACE Quality to Excellence	May 10, 2012
CA237166	Perform a Review of USAR Chapter 5 Table 5.2-3	June 7, 2012
CA238458	Review the Procedure that Document the Performance of the Surveillance Require	June 26, 2012
CA238789	Revise OP-AA-102, Step 3.7	June 28, 2012
CA240372	Determine, Document, and Initiate Actions More Permanent Solution for VBS Temporary Barrier	July 20, 2012
CA241790	Develop Guidance to Plan For Work Activities That Impact Security	August 10, 2012
CA241792	Revise Security Implementing Procedures 30.04	August 10, 2012
CA241795	Security Training Agenda to Address “Equivalent Barriers”	August 10, 2012
CA241799	Revise Security Lesson Plans To Address Compensatory Measures	August 10, 2012
CA241800	Evaluate Current Protection Services Pre-Job Brief Processes	August 10, 2012
CA414693	Radiation Area Posting on the Wrong Side of the Door	February 22, 2011

LTR000472	LTR to Licensing to Review reportability of 1/2011 SBV Servo Board Issue	June 6, 2011
-----------	--	--------------

Apparent Cause Evaluations

ACE000787	Turbine Building Service Water Header B Air Accumulator Pressure Low	November 15, 2007
ACE003367	RWST Setpoint Changes Proposed Do Not Consider Affect on Calculations	January 22, 2007
ACE017635	ACE to Evaluate 2009 INPO AFI ER.1-2 Circuit Breakers	July 23, 2009
ACE017856	Unexpected RHR/Cavity Dilution	April 21, 2010
ACE018301	NRC Violation for Inadequate NRC Approval	May 27, 2011
ACE018339	Proposed Non-Cited Violation for Ineffective Corrective Actions	January 19, 2011
ACE018344	SW-4A Open Causing Unexpected Entry into Action Statement	July 12, 2012
ACE018474	NRC Proposed Non-Cited Violation and Cross-Cutting Aspect for Procedure Use	March 22, 2011
ACE018489	CR Zone SV A Has Failed Charcoal Lab Test Results for Radioiodine Test	February 16, 2011
ACE018531	Failed Standoffs Used to Mount SBV Servo Boards	May 3, 2011
ACE018552	Failure to Include Fast Bus Transfer Study Calculation C11721 in design Approval Documents	February 14, 2012
ACE018578	Diesel Generator 'A' Hunting During Hot Fast Start Test	July 25, 2011
ACE018594	SI-11A Breaker Found ON with Plant in Mode 3	March 26, 2011
ACE018594	SI-11A Breaker Found ON with Plant in Mode 3	May 25, 2011
ACE018595	Reactor Vessel Head Voiding During RCS Draining	August 22, 2011
ACE018698	Potential Finding for OD 413 Technical Evaluation	November 3, 2011
ACE018711	RC-423 Red/Green Indication Indicates Mid Position	June 14, 2011
ACE018773	Violation for SBV Past Operability	October 27, 2011
ACE018790	Non-Safety Related Parts Installed in Safety Related Application	October 31, 2011
ACE018980	TI 2515/177 NRC Inspection – Gas Void Inspection NRC Violation	April 6, 2012
ACE019003	Operability Evaluation for ACC-15 and ACC-16 Not Addressing Compensatory Measures	March 29, 2012
ACE019013	EDG "B" Breaker 1-603 Closed Unexpectedly	June 14, 2012
ACE019051	Operation of Sandpiper Pump Resulting in Spraying Contaminated Water	February 15, 2012

ACE019130	NRC Non-Cited Violation for Inadequate Controls in Procedure OSP-CCI-004	July 5, 2012
ACE019132	NCV for Failure to Revise LER 2011-005	June 13, 2012
ACE019143	Leak in N31/N35 Detector Cable 1RI087R	June 26, 2012
ACE019202	Worker with Expired Radiation Worker Training Entered RCA	October 17, 2012
ACE019204	Inadequate Compensatory Measure	September 13, 2012

Common Cause Evaluations

CCA000162	Multiple Procedure Use and Adherence Issues in 2010	January 24, 2011
CCA000175	Three Cross-Cutting Aspects in Area of Human Performance – Documentation H.2(c): Review Findings	January 6, 2011
CCA000198	Multiple Missed Patrol/Tour Events	July 1, 2011

Audits, Assessments and Self-Assessments

Audit 11-02	Emergency Preparedness	April 13, 2011
Audit 11-03	M&TE and Kewaunee Refueling	June 9, 2011
Audit 11-05	Corrective Action & Independent Review	July 25, 2011
Audit 11-13	Maintenance	January 13, 2011
Audit 12-02	Emergency Preparedness	April 2, 2012
SAR000730	Assess the Operations Department Awareness of Operator Fundamentals	January 20, 2010
SAR000995	Chemical Control Program, CY-AA-CTL-510	April 5, 2011
SAR001002	Formal Self-Assessment - Breaker Maintenance	January 28, 2011
SAR001191	Post Job Comments Incorporated into Pre-job Briefing Database Maintenance Mech	April 7, 2011
SAR001235	Informal Self Assessment Report: Emergency Response Organization (ERO) Activation (Including On-Shift staffing and Staff Augmentation)	December 14, 2011
SAR001341	Assess Command and Control in the Operations Department at KPS	February 14, 2011
SAR001471	Kewaunee Power Station Annual Force on Force Readiness and Protective Strategy Evaluation	April 26, 2011
SAR001486	Informal Self-Assessment, M&TE Program Adherence/Effectiveness	October 10, 2011
SAR001506	Informal Self-Assessment – NRC Inspection – Equipment Performance, Testing, Maintenance, and PA Security Performance Index	June 29, 2011

SAR001598	Informal Self-Assessment on Conservative Decision Making	September 29, 2011
SAR001606	Self-Assessment Report: KPS EWS Design Requirements and Maintenance Procedures	September 8, 2011
SAR001612	Formal Self-Assessment - Maintenance Rule	March 30, 2011
SAR001647	Self-Assessment Report: Diesel Generator (DG) Mechanical (M) and Electrical (E) (System 10/EGM and 42/DGE) System Health	January 24, 2012
SAR001829	Force on Force Readiness and Protective Strategy Evaluation	March 22, 2012
SAR001834	Formal Self-Assessment - Problem Identification and Resolution	May 21, 2012
SAR001984	Kewaunee Power Station's 2012 Mid-Cycle Review Assessment	
SAR014161	Fleet Wide Operator Fundamentals	September 12, 2011
SAR016904	KPS-SA-07-02 – Formal Self Assessment – NRC CDBI Pre-Inspection Self-Assessment	February 27, 2007
N/A	Presentation Slides: Engineering Department Self Evaluation Meeting	August 2012

Miscellaneous

A1G000206	ICCMS System 50 (a)(1) Action Plan	April 10, 2009
A1G000230	ICCMS System 50 (a)(1) Action Plan	April 10, 2009
A1G000250	Core Exit Thermocouples System 50 (a)(1) Action Plan	January 8, 2010
A1G000330	System 40 – ELV (480VAC) Protection Relays	May 23, 2013
AFR000018	Audit Finding No. 11-05-02K Condition Reports were Not Issued to Initiate MRE	July 8, 2011
Calculation C10690	OCDM Setpoint Calculation	Revision 2
Calculation QA-2268581	Seismic Qualification Report of 125 Volt DC LCR 25 Batteries, 2 Step Battery Racks & Single-Row Spare Cell Rack	Revision 1
Condition Report List	List of Condition Reports with Procedure Adherence Hot Buttons Assigned	July 2007-September 2012
DCR 3687, Att B	C&D Technologies, #RS-1476, Section 12-800; Standby Battery Vented Cell Installation and Operating Instructions	Revision 0
DCR032531	Modification to Improve TLE of RWST Level Instruments L-920 and L-921	August 24, 2007
Drawing E-1419	S/D MCC 1-62E Motor 1-421 MCC 1-62H Motor 1-150	Revision X
Drawing E-2032	Integrated Logic Diagram Safety Injection System	Revision Z

Drawing OPERM-601	Flow Diagram Turbine & Auxiliary Bldg Ventilation	Revision DH
Drawing OPERM-604	Flow Diagram Auxiliary Building Zone SV Vent & Air Conditioning	Revision DH
Expert Panel Memo	BRA-111 Instrument Bus Inverter Return to (a)(2)	April 24, 2007
Form HPF-224	KPS RP Instrument Response Investigation Report (for PNR-4 – CR436673)	Revision 1
LER 2011-001-00	Auxiliary Building Special Ventilation Inoperability Results in Prohibited Technical Specification Condition	February 11, 2011
ML081780537	NEI Position Statement: Guidance to Licensees on Complying with the Licensed Power Limit	June 12, 2008
MRE007341	MRE for Breaker Failing to Close	November 24, 2008
MRE007342	MRE for Screen House Exhaust Fan B Inoperable	November 24, 2008
MRE011445	ICCMS Train B Failure, Train B CET Point 13 (D2) has Failed High (2300 F)	November 16, 2007
MRE013493	Core Exit Thermocouple (CET T-27 at Core Location F-12 Failed Down Scale	April 8, 2011
MRE014961	BKR 13504 as-found 900% Short Time Trip Was Low Out of Band	
MRE02967	Inverter SCR Failure BRA111 (RCE 747)	October 2006
NNOE000625	Inadequate NRC Approval for Change Made to EALs	August 12, 2010
NRC RIS 2011-12	Adequacy Of Station Electrical Distribution System Voltages	Revision 1
OTH010859	Review INPO EPG-04 Service Water Reliability	October 10, 2005
PCR023980	Revise NID-01.01 to Report Open Work in Health Reports	May 30, 2006
PCR023981	Revise GL-89-13 Inspection Program Procedure, FP-PE-SW01, to Require Documented Justification for Removal of Any Location from the Inspection Scope	May 30, 2006
PCR023982	Define the Methods to be Used to Document RT Examination Areas	May 30, 2006
PCR023983	Revise GL-89-13 Inspection Program Procedure, FP-PE-SW-01 to Provide New Acceptance Criteria for Minimum Wall Thickness	May 30, 2006
PCR030063	RWST Setpoint Changes Proposed Do Not Consider Affect on Calculations	February 28, 2007
PCR030137	Revise GNP 05.16.06 times for Containment Sump Recirculation	March 1, 2007
PCR032012	Review and Update SACGR-01, SAG-01 as Necessary to Support the Revisions to the IPEOPs	May 16, 2007
Procedure Change Form	Procedure OP-KW-GOP-103, "Startup From RHR to Mode 3" Change To Revision 15	July 12, 2011
S-208	Reactor Building Containment & Shield Wall, Sections & Details	Revision J

UCR R21-018	USAR Change Request	June 12, 2007
WO KW07-007948	DCR 3687, Replace Station Battery BRB101 During 2008 Refueling Outage	
WO KW07-007949	DCR 3687, Replace Station Battery BRA101 During 2008 Refueling Outage	
Cause Evaluation Down-Grade Template CR477079 RCE001081		May 30, 2012
Cause Evaluation Down-Grade Template CR486089 ACE019248		August 28, 2012
Dominion Nuclear CAP Trend Report – Kewaunee		2 nd Quarter 2012
Letter from Timothy Kobetz to Mike Schoppman communicating NRC comments of the review of NEI Position Statement: Guidance to Licensees on Complying with the Licensed Power Limit		April 24, 2008
NRC Safety Evaluation of NEI Guidance Document to Licensees on Complying with the Licensed Power Limit		October 8, 2008
Nuclear Safety Culture Assessment for 2010 KPS Mid-Cycle Review		2010
Organizational Effectiveness Pulse Survey Kewaunee		March 5, 2012
Presentation Slides: Engineering Department Self Evaluation Meeting		August 2012
Screening Evaluation Work Sheet for BRA101: Seismic Corrective Action Programacity VS Demand		March 17, 1993
Screening Evaluation Work Sheet for BRB101: Seismic Corrective Action Programacity VS Demand		March 17, 1993
System Health Report: Emergency Diesel Generator		Q2-2008
System Health Report: Emergency Diesel Generator		Q2-2009
System Health Report: Emergency Diesel Generator		Q2-2010
System Health Report: Emergency Diesel Generator		Q2-2011
System Health Report: Emergency Diesel Generator		Q2-2012

Operating Experience

CA218615	Conduct Evaluation Per PI-AA-100-107	November 7, 2011
CA218615	Preliminary – (Update to OE34484) Crack Indication in the Architectural Flute Area of Shield Building (Davis-Besse)	February 2, 2012
CA240424	Review IER L4-12-57, Shield Building Cracking	July 23, 2012
CA240424	IER L4-12-57, Shield Building Cracking	September 10, 2012
CA240424	IER L4-12-57, Shield Building Cracking, PI-AA-100-107 Attachment 6	September 13, 2012
CR404742	SEN 287, Delamination of Concrete Discovered during Hydro-Excavation	November 11, 2010

CR451257	OE34543 – Crack Indication in the Architectural Flute Area of Shield Building (Davis-Besse)	November 3, 2011
CR469567	Oil Leak on Diesel Generator B Lube Oil Cooler	April 7, 2012
CR482109	IER L4-12-59, Shield Building Cracking	July 18, 2012
EN 47572	Invalid EDG Activation Due to Technician Error	January 5, 2012
NNOE000702	CR Zone SV A Has Failed Charcoal Lab Test Results for Radioiodine Test	December 15, 2010
OE001479	IN12-06 Ineffective Use of Vendor Technical Recommendations	June 11, 2012
OE030898	Preliminary - Indications on Multiple Control Rod Drive Mechanism Nozzles (Davis-Besse)	April 7, 2010
OE031664	(Update to OE30893) Indications on Multiple Control Rod Drive Mechanism Nozzles (Davis-Besse)	July 29, 2010
OE034543	Preliminary – (Update to OE34484) Crack Indication in the Architectural Flute Area of Shield Building (Davis-Besse)	October 28, 2011
OEE001365	Diesel Generator Output Breaker Trip Results in Loss of Shutdown Cooling and Fuel Pool Cooling (Browns Ferry 1)	August 19, 2011
OEE001365	OPEX002978: OE33881 – (Update to OE33487) – A Diesel Generator Output Breaker Trip results in Loss of Shutdown Cooling and Fuel Pool Cooling	August 19, 2011
OPEX003065	IN12-06 Ineffective Use of Vendor Technical Recommendations	June 6, 2012

Procedures/Guidances

AD-AA-101-1002	Writers Guide For Procedures and Guidance and Reference Documents	Revision 5
DCR 3754	Cancellation Notification for DCR 3754	January 10, 2012
DNAP-0110	Identifying and Addressing Nuclear Safety and Quality Concerns	Revision 2
ECP-GL-01	Nuclear Employee Concerns Program	Revision 10
EP-AA-102	Revision and Control of Emergency Plan, Emergency Action Levels (Technical Basis and Matrix), and Reference Manual	Revision 5
Fire Impairment 07-100	Scaffold is Blocking Appendix R Light #EC-RAM-24 (North Penn Room)	October 6, 2007
Fire Impairment 07-81	Appendix R Lighting is Non-Functional in Zones AX-23A, AX-24, TU-92, and TU-95C	August 24, 2007
GNP-01.09.02	Service Water and Fire Protection System Through Wall Leakage Integrity Program	Revision 1

GNP-01.09.02	Service Water and Fire Protection System Through Wall Leakage Integrity Program	Revision 3
NOP-SUB-003	RST and TST Load Tap Changer Operation	Revision 8
OP-AA-102	Operability Determination	Revision 9
OP-AP-300	Reactivity Management	Revision 14
OP-AP-300	Reactivity Management	Revision 5
OP-KW-NOP-RHR-001	Residual Heat Removal System Operation	Revision 12
OP-KW-OSP-DGE-003A	Diesel Generator A Semi-Annual Fast Start Test	Revision 15
OP-KW-OSP-DGE-003A	Diesel Generator A Semi-Annual Fast Start Test	Revision 16
OP-KW-OSP-DGE-003A	Diesel Generator A Semi-Annual Fast Start Test	Revision 18
PI-AA-100-1004	Self-Assessments	Revision 8
PI-AA-200	Corrective Action	Revision 19
PI-AA-200	Corrective Action	Revision 19
PI-AA-200	Corrective Action	Revision 6
PI-AA-200-2002	Effectiveness Reviews	Revision 4
PI-AA-300-3001	Root Cause Evaluation	Revision 3
PI-AA-300-3002	Apparent Cause Evaluation	Revision 4
RP-AA-400	Portable Survey Instrumentation	Revision 2
RP-KW-005-021	Health Physics	Revision 3
SP-32B-116	Surveillance Procedure: Gaseous Radioactive Effluents – Reports for Batch Releases	Revision 36
WM-AA-101	Work Order Planning	Revision 1
	Kewaunee Nuclear Power Plant Fire Protection Program Plan	Revision 11

Root Cause Evaluations

RCE000720	Service Water to B Diesel Generator	June 16, 2006
RCE001029	Safety Injection Pumps – Minimum Flow	November 23, 2010
RCE001053	RAT/RST Modification Request for Root Cause Evaluation	0

RCE001070	Breaker 1-603 Closed Unexpectedly during Performance of OSP-DGE-003B	January 24, 2012
-----------	--	------------------

Condition Reports Generated As a Result of the NRC Inspection

CR487782	2012 PI&R Inspection – NRC RI Questioned the Operability Call for ASV-51A	September 12, 2012
CR489129	2012 PI&R Inspection – Use of Substitution Test, ACE19013, B EDG Output Breaker	September 25, 2012
CR489379	2012 PI&R Inspection – Identification of Missed Opportunity	September 26, 2012
CR489380	2012 PI&R Inspection – OP-KW-GOP-103 Was Not Included for Revision for DCR 3741	September 26, 2012
CR489442	2012 PI&R Inspection – Screening of Reactivity Management Issues per OP-AP-300	September 27, 2012
CR489462	2012 PI&R Inspection – Screening of Condition Reports for Significance per PI-AA-200	September 27, 2012
CR489875	2012 PI&R Inspection – Minor Violation Appendix R Issues Related to Active Fire Impairment	October 1, 2012
CR489877	2012 PI&R Inspection – Observation – SW Dead Leg Replacement	October 1, 2012
CR489879	2012 PI&R Inspection – Observation – Radiac Calibration	October 1, 2012
CR489887	2012 PI&R Inspection – Observation – RP Instrument Response Investigation Evaluation	October 1, 2012
CR489954	2012 PI&R Inspection – Actions Required to Resolve Impairment No. 07-100	October 2, 2012
CR489958	2012 PI&R NRC Non-Cited Violation – Improper Restraint of Battery BRB-101	October 2, 2012

Although implementation of the Corrective Action Program was determined to be effective overall, based on the samples reviewed, one finding of very low safety significance (Green) was identified during this inspection. The finding was also determined to involve a violation of NRC requirements. However, because of its very low safety significance and because the issue was entered into your Corrective Action Program, the NRC is treating this as non-cited violation in accordance with Section 2.3.2 of the NRC Enforcement Policy. In addition, the team identified several issues that were either minor in nature and/or represented potential weakness of your program, warranting your attention.

If you contest the subject or severity of a 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 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 Warrenton 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 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 (PARS) component of the NRC's Agencywide Documents Access and Management 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/

Kenneth Riemer, Chief
Branch 2
Division of Reactor Projects

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

Enclosure: Inspection Report No. 05000305/2012008
w/Attachment: Supplemental Information

cc w/encl: Distribution via ListServ™

DISTRIBUTION:
See next page

DOCUMENT NAME: Kewaunee PI&R 2012 008

Publicly Available Non-Publicly Available Sensitive Non-Sensitive

To receive a copy of this document, indicate in the concurrence box "C" = Copy without attach/encl "E" = Copy with attach/encl "N" = No copy

OFFICE	RIII	N	RIII	E	RIII	RIII
NAME	RNg:rij		KRiemer			
DATE	11/01/12		11/01/12			

OFFICIAL RECORD COPY

Letter to D. Heacock from K. Riemer dated November 1, 2012

SUBJECT: KEWAUNEE POWER STATION, NRC PROBLEM IDENTIFICATION AND
RESOLUTION INSPECTION REPORT 05000305/2012008

DISTRIBUTION:

Cayetano Santos

RidsNrrDorLpl3-1 Resource

RidsNrrPMKewaunee

RidsNrrDirslrib Resource

Chuck Casto

Cynthia Pederson

Steven Orth

Jared Heck

Allan Barker

Christine Lipa

Carole Ariano

Linda Linn

DRPIII

DRSIII

Tammy Tomczak

ROPreports.Resource@nrc.gov