

November 29, 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: MID-CYCLE PERFORMANCE REVIEW AND INSPECTION PLAN -  
KEWAUNEE NUCLEAR POWER PLANT

Dear Mr. Reddemann:

On November 7, 2000, the NRC staff completed its Mid-Cycle plant performance assessment of the Kewaunee Nuclear Power Plant. The Mid-Cycle Review for the Kewaunee Nuclear Power Plant involved the participation of all technical divisions in evaluating performance indicators (PIs) and inspection results for the period of April 2, 2000, through September 30, 2000. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility so that you will have an opportunity to prepare for these inspections and to inform us of any planned inspections which may conflict with your plant activities.

Plant performance for the most recent quarter was within the Degraded Cornerstone column of the NRC's Action Matrix in that one of the seven cornerstones was in a degraded condition. This was based on the YELLOW PI, which continued over 2 consecutive reporting periods, representing performance that minimally reduced safety margin for the Alert and Notification System availability in the Emergency Preparedness Cornerstone. In addition, two preliminary WHITE findings (issues of low to moderate safety significance) were identified for which the risk significance has yet to be finalized: one involving emergency response organization staffing augmentation drills in the Emergency Preparedness Cornerstone and one involving the auxiliary feedwater system in the Mitigating Systems Cornerstone. Inadequate corrective actions directly contributed to the augmentation drill finding.

During this assessment period, the NRC performed two supplemental inspections to assess the adequacy of your evaluation and corrective actions associated with the consecutive YELLOW PI. These inspections identified that deficiencies in the Kewaunee Corrective Action Program were a cause of the YELLOW PI and that your root cause evaluation of the YELLOW PI was not adequate. As a result, a YELLOW inspection finding was issued that corresponds to the YELLOW PI. As both the PI and the inspection finding stem from the same issue, the issue will not be double counted in the NRC's Action Matrix. We will contact you separately to discuss plans to set up meetings regarding the above issues.

Additionally, the staff has identified a substantive cross-cutting issue in the area of Problem Identification and Resolution (corrective action). The NRC concluded that the Corrective Action Program at Kewaunee showed significant weaknesses. These weaknesses impacted the corrective action program throughout the site and affected multiple cornerstones in the strategic performance areas of Reactor Safety, Radiation Safety, and Safeguards.

You have acknowledged that there are problems with the Corrective Action Program and initiated action to change the Corrective Action Program and complete a root cause analysis for the YELLOW PI. The NRC plans to conduct an additional supplemental inspection to assess your actions to correct the problems that have been identified with your Corrective Action Program and your root cause evaluation for the YELLOW PI.

The enclosure details the scheduled inspections that will occur through September 30, 2001. The inspection plan is provided to minimize the resource impact on your staff and to allow for scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The last 6 months of the inspection plans are tentative and may be revised at the end-of-cycle review meeting.

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

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact Roger Lanksbury (DRP Branch Chief) at (630) 829-9631 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

*/RA/*

J. E. Dyer  
Regional Administrator

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

Enclosure: Kewaunee Nuclear Power Plant Inspection/Activity Plan

See Attached Distribution

DOCUMENT NAME: G:\PPR LETTERS/insppln10kewa.wpd **\*See previous concurrence**  
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		RIII		RIII	
NAME	Lanksbury		Grant		Grobe		Dyer	
DATE	11/28/00*		11/28/00		11/28 /00		11/29/00	

**OFFICIAL RECORD COPY**

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

ADAMS Distribution:

DFT

M. Satorius, OEDO

T. Boyce, NRR

Project Director, NRR

Project Mgr., NRR

RidsNrrDipmlipb

J. Caldwell, RIII

G. Grant, RIII

B. Clayton, RIII

R. Lickus, RIII

SRI Kewaunee

DRSIII

PLB1

JRK1

BAH3

**Kewaunee**  
**Inspection / Activity Plan**  
**12/01/2000 - 09/30/2001**

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates		Inspection Type
				Start	End	
	<b>71111.01 - ADVERSE WEATHER (COLD)</b>		<b>2</b>			
1	IP 7111101	Adverse Weather Protection		10/30/2000	12/11/2000	Baseline Inspections
	<b>DRPBR5 - ROUTINE RESIDENTS INSPECTION</b>		<b>3</b>			
1	IP 7111101	Adverse Weather Protection		11/10/2000	12/31/2000	Baseline Inspections
	<b>71130.03 - SAFEGUARDS INSPECTION-RESPONSE(ADMN)</b>		<b>1</b>			
1	IP 7113003	Response to Contingency Events (Protective Strategy and Implementation of Protective Strategie		12/04/2000	12/08/2000	Baseline Inspections
	<b>50.59 - EVALUATION OF CHANGES TESTS&amp; EXPERIMENTS</b>		<b>1</b>			
1	IP 7111102	Evaluation of Changes, Tests, or Experiments		12/04/2000	12/09/2000	Baseline Inspections
	<b>FY 2001 - KEWAUNEE INIT EXAM 12/2000</b>		<b>3</b>			
1	W90031	OL - INITIAL EXAM - KEWAUNEE		12/11/2000	12/22/2000	Not Applicable
	<b>FPI - TRIENNIAL FIRE PROTECTION</b>		<b>3</b>			
1	IP 7111105T	Fire Protection		01/29/2001	02/16/2001	Baseline Inspections
	<b>IP 95002 - SUPPL INSP: YELLOW ANS PERF INDICATOR</b>		<b>3</b>			
1	IP 95002	Inspection For One Degraded Cornerstone Or Any Three White Inputs In A Strategic Performar		02/19/2001	03/02/2001	Supplemental Program
	<b>IP 71121 - RADIATION MONITORING INSTRUMENTATION</b>		<b>1</b>			
1	IP 7112101	Access Control to Radiologically Significant Areas		03/26/2001	03/30/2001	Baseline Inspections
1	IP 7112103	Radiation Monitoring Instrumentation		03/26/2001	03/30/2001	Baseline Inspections
	<b>71111.01 - ADVERSE WEATHER PROTECTION (HOT)</b>		<b>2</b>			
1	IP 7111101	Adverse Weather Protection		05/11/2001	06/30/2001	Baseline Inspections
	<b>DRPBR5 - ROUTINE RESIDENTS INSPECTION</b>		<b>3</b>			
1	IP 7111106	Flood Protection Measures		05/11/2001	06/30/2001	Baseline Inspections
	<b>IP 71122 - LIQ/GAS EFFLUENTS INSP</b>		<b>1</b>			
1	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		06/18/2001	06/22/2001	Baseline Inspections
1	IP 71151	Performance Indicator Verification		06/18/2001	06/22/2001	Baseline Inspections
	<b>MR - MAINTENANCE RULE BIENNIAL</b>		<b>1</b>			
1	IP 7111112B	Maintenance Rule Implementation		06/25/2001	06/29/2001	Baseline Inspections
	<b>IP 71114 - BIENNIAL EMERG PREP EXER INSP</b>		<b>3</b>			
1	IP 7111401	Exercise Evaluation		07/30/2001	08/03/2001	Baseline Inspections
1	IP 71151	Performance Indicator Verification		07/30/2001	08/03/2001	Baseline Inspections
	<b>DRPBR5 - ROUTINE RESIDENTS INSPECTION</b>		<b>3</b>			
1	IP 7111120	Refueling and Outage Activities		08/10/2001	09/30/2001	Baseline Inspections
	<b>MOD/50.5 - BIENNIAL PERMANENT MODS AND 50.59</b>		<b>3</b>			
1	IP 7111102	Evaluation of Changes, Tests, or Experiments		08/13/2001	08/17/2001	Baseline Inspections
1	IP 7111117B	Permanent Plant Modifications		08/13/2001	08/17/2001	Baseline Inspections
	<b>DRPBR5 - PROBLEM IDENTIFICATION AND RESOLUTION</b>		<b>5</b>			
1	IP 71152	Identification and Resolution of Problems		08/13/2001	08/24/2001	Baseline Inspections

This report does not include INPO and OUTAGE activities.  
This report shows only on-site and announced inspection procedures.

**Kewaunee**  
**Inspection / Activity Plan**  
**12/01/2000 - 09/30/2001**

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates		Inspection Type
				Start	End	
	<b>IP 71121</b>	<b>- SGRP OUTAGE ALARA INSP</b>	<b>2</b>			
1	IP 7112101	Access Control to Radiologically Significant Areas		09/04/2001	10/05/2001	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		09/04/2001	10/05/2001	Baseline Inspections
1	IP 71151	Performance Indicator Verification		09/04/2001	10/05/2001	Baseline Inspections
	<b>SGRP</b>	<b>- STEAM GENERATOR REPLACEMENT</b>	<b>1</b>			
1	IP 50001	Steam Generator Replacement Inspection		09/15/2001	11/16/2001	Supplemental Program

This report does not include INPO and OUTAGE activities.  
This report shows only on-site and announced inspection procedures.