March 22, 2001

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

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-02, "LOSS OF REACTOR COOLANT INVENTORY AND ASSOCIATED POTENTIAL FOR LOSS OF EMERGENCY MITIGATION FUNCTION WHILE IN A SHUTDOWN CONDITION" (TAC NO. MA4791)

Dear Mr. Reddemann:

On May 28, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-02 to all holders of operating licenses for Pressurized Water Reactors (PWR), except those who have permanently ceased operations, and have certified that fuel has been permanently removed from the reactor vessel. The NRC issued GL 98-02 to request that PWR licensees evaluate a September 17, 1994, event, which occurred at Wolf Creek, which had the potential to drain-down the reactor coolant system (RCS) to the refueling water storage tank (RWST) and, at the same time, render the emergency core cooling system (ECCS) and residual heat removal (RHR) system inoperable by introducing a steam/water mixture to the suction side of the ECCS and RHR pumps. Addressees of GL 98-02 were requested to provide the following information within 180 days: (1) an assessment of whether the addressee's facility is vulnerable to the September 17, 1994, Wolf Creek event, and (2) if the facility is found to be vulnerable, an assessment of the plant-specific 10 CFR Part 50, Appendix B, quality assurance program attributes which will prevent the subject event. If the addressee's facility was determined to be vulnerable, a response to information item (1) was to be provided pursuant to 10 CFR 50.54(f) and 10 CFR 50.4, and the responses to information items (1) and (2) were to be kept in a licensee's retrievable system for use by the NRC staff on an as-needed basis.

In response to GL 98-02, you provided a letter dated November 24, 1998, for Kewaunee Nuclear Power Plant (KNPP). The submittal indicated that KNPP was vulnerable to the type of incident which occurred at Wolf Creek and further indicated that the plant evaluation concerning the subject vulnerability (information item (2) of GL 98-02), was being kept in a retrievable licensee system that the NRC can verify on an as-needed or sample basis, in accordance with GL 98-02.

By letter dated May 3, 2000, the Region III NRC staff issued NRC Inspection Report No. 50-305/2000004(DRP). The subject inspection report contained details of the NRC staff's on-site verification of activities which you undertook in response to GL 98-02 for KNPP. Specifically, the inspectors verified that you had effectively implemented administrative controls, configuration management, and operating procedures to preclude an inadvertent drain-down event as described in GL 98-02. During the review of your response, the inspectors identified

statements related to system configuration controls which were inaccurate. The inspectors concluded that the valve position verification statements concerning valves RHR-110 and RHR-400A(B) were inaccurate since the valves were not verified to be closed in plant operations procedures prior to placing the RHR system in operation for RCS cooldown. With respect to RHR-110, your staff stated that the valve was only opened to drain the refueling cavity following refueling operations and at that time it was independently verified closed. These verifications were required by operations procedures. Additional verifications or administrative controls were not required during maintenance since maintenance on the valve could not be performed unless it was isolated by an upstream and downstream valve. As a result, the inspectors did not consider the inaccurate statements regarding RH-110 to be material. With respect to RHR-400A(B), your staff subsequently initiated revisions to Procedure N-RHR-34 to ensure these valves were verified closed prior to placing the RHR system into service. Your staff initiated KAP 00-000709 to document the potentially inaccurate statements. The inspectors concluded that the inaccurate information regarding RHR-400A(B) was material to the GL response since the omission of these valves from the operations procedures was inadequate to address the event described in GL 98-02. The inaccurate statements in the response to GL 98-02 contained in a letter dated November 24, 1998, resulted in a violation. However, this Severity Level IV violation was treated as a Non-Cited Violation, consistent with Section VII.B.1.a of the NRC Enforcement Policy (NCV 50-305/2000004-02, Inaccurate Licensee Statements in Response to the GL). The controls described in your response to the GL, as revised by the inclusion of valves RHR-400A(B) in procedure N-RHR-34, were determined to be acceptable. Therefore, NRC Inspection Report No. 50-305/2000004(DRP) closed out the NRC staff's on-site verification of activities which you undertook in response to GL 98-02 for KNPP.

The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided, and (2) that your on-site activities adequately addressed the concerns of GL 98-02 for KNPP; therefore, we consider GL 98-02 to be closed for KNPP.

Sincerely,

/RA/

John G. Lamb, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-305

cc: See next page

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The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided, and (2) that your on-site activities adequately addressed the concerns of GL 98-02 for KNPP; therefore, we consider GL 98-02 to be closed for KNPP.

Sincerely,

/RA/

John G. Lamb, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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