



JUL 05 2006

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Serial No. 06-549
KPS/LIC/RR: RO
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
LICENSEE EVENT REPORT 2006-003-00

Dear Sirs:

Pursuant to 10 CFR 50.73, Dominion Energy Kewaunee, Inc., hereby submits the following Licensee Event Report applicable to Kewaunee Power Station.

Report No. 50-305/2006-003-00

This report has been reviewed by the Plant Operating Review Committee and will be forwarded to the Management Safety Review Committee for its review.

If you have any further questions, please contact Mr. Richard Repshas at (920) 388-8217.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Kevin Plavon", with the word "for" written below it.

Leslie N. Hartz
Site Vice President, Kewaunee Power Station

Attachment

Commitments made by this letter: NONE

JE22

cc: Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4352

Mr. D. H. Jaffe
Project Manager
U.S. Nuclear Regulatory Commission
Mail Stop O-7-D-1
Washington, D. C. 20555

Mr. S. C. Burton
NRC Senior Resident Inspector
Kewaunee Power Station

LICENSEE EVENT REPORT (LER)(See reverse for required number of
digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0066), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

FACILITY NAME (1)

Kewaunee Power Station

DOCKET NUMBER (2)

05000305

PAGE (3)

1 of 3

TITLE (4)

Residual Heat Removal Pumps Declared Inoperable Due to Flooding Vulnerability

| EVENT DATE (5) | | | LER NUMBER (6) | | | REPORT DATE (7) | | | OTHER FACILITIES INVOLVED (8) | |
|--------------------|-----|------|--|-------------------|---------------------|-----------------|----------------------|------|---|---------------|
| MO | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REV NO | MO | DAY | YEAR | FACILITY NAME | DOCKET NUMBER |
| 05 | 05 | 2006 | 2006 | -- 003 -- | 00 | 07 | 05 | 2006 | FACILITY NAME | DOCKET NUMBER |
| OPERATING MODE (9) | | N | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR .: (Check all that apply) (11) | | | | | | | |
| POWER LEVEL (10) | | 000 | 20.2201(b) | | 20.2203(a)(3)(ii) | | 50.73(a)(2)(ii)(B) | | 50.73(a)(2)(ix)(A) | |
| | | | 20.2201(d) | | 20.2203(a)(4) | | 50.73(a)(2)(iii) | | 50.73(a)(2)(x) | |
| | | | 20.2203(a)(1) | | 50.36(c)(1)(i)(A) | | 50.73(a)(2)(iv)(A) | | 73.71(a)(4) | |
| | | | 20.2203(a)(2)(i) | | 50.36(c)(1)(ii)(A) | | 50.73(a)(2)(v)(A) | | 73.71(a)(5) | |
| | | | 20.2203(a)(2)(ii) | | 50.36(c)(2) | | X 50.73(a)(2)(v)(B) | | OTHER Specify in Abstract below or in NRC Form 366A | |
| | | | 20.2203(a)(2)(iii) | | 50.46(a)(3)(ii) | | 50.73(a)(2)(v)(C) | | | |
| | | | 20.2203(a)(2)(iv) | | 50.73(a)(2)(i)(A) | | 50.73(a)(2)(v)(D) | | | |
| | | | 20.2203(a)(2)(v) | | X 50.73(a)(2)(i)(B) | | 50.73(a)(2)(vii) | | | |
| | | | 20.2203(a)(2)(vi) | | 50.73(a)(2)(i)(C) | | 50.73(a)(2)(viii)(A) | | | |
| | | | 20.2203(a)(3)(i) | | 50.73(a)(2)(ii)(A) | | 50.73(a)(2)(viii)(B) | | | |

LICENSEE CONTACT FOR THIS LER (12)

NAME

Richard Repshas

TELEPHONE NUMBER (Include Area Code)

(920) 388-8217

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

| CAUSE | SYSTEM | COMPONENT | MANU-FACTURER | REPORTABLE TO EPIX | CAUSE | SYSTEM | COMPONENT | MANU-FACTURER | REPORTABLE TO EPIX |
|-------|--------|-----------|---------------|--------------------|-------|--------|-----------|---------------|--------------------|
| | | | | | | | | | |

SUPPLEMENTAL REPORT EXPECTED (14)

| SUPPLEMENTAL REPORT EXPECTED (14) | | | | EXPECTED SUBMISSION DATE (15) | | MONTH | DAY | YEAR |
|-----------------------------------|-----|--|--|-------------------------------|--|-------|-----|------|
| X | YES | (If yes, complete EXPECTED SUBMISSION DATE). | | | | 10 | 26 | 2006 |

ABSTRACT

On May 5, 2006 at 1600 CST in intermediate shutdown, the Kewaunee Power Station declared both trains of the residual heat removal (RHR) system inoperable due to internal flooding vulnerability caused by the possibility of non-seismically qualified pipe breaks during a seismic event. The RHR pumps are not protected from non-seismically qualified pipe breaks in the auxiliary building. The specific design criteria is stated in the Updated Safety Analysis Report Section B.5 'Protection of Class I Items' and states that "Class I items are protected against damage from Rupture of a pipe or tank resulting in serious flooding or excessive steam release to the extent that the Class I function is impaired." The two RHR trains are not separated in a manner that would prevent simultaneous damage to both trains from a failure of a non-seismically qualified pipe.

This event was reported under Event Number 42557 in accordance with 10CFR50.72(b)(3)(v)(B), "Any event that at the time of discovery could have prevented the fulfillment of the safety function of systems that are needed to remove residual heat."

This is being reported in accordance with 10 CFR 50.73(a)(2)(v)(B), "Any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to remove residual heat" and 10 CFR 50.73(a)(2)(i)(B), "Any condition which was prohibited by the plant's Technical Specifications."

Assessment of this issue is still under evaluation. Results of the assessment will be provided in a supplement to this LER. This is being reported as a safety system functional failure.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

| FACILITY NAME (1) | | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) |
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| Kewaunee Power Station | | 05000305 | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | 2 of 3 |
| | | | 2006 | -- 003 | -- 00 | |

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Event Description:

On May 5, 2006 at 1600 CST in intermediate shutdown, the Kewaunee Power Station declared both trains of the residual heat removal (RHR) system inoperable due to internal flooding vulnerability caused by the possibility of non-seismically qualified pipe [PSP] breaks during a seismic event. The RHR pumps [P] are not protected from non-seismically qualified pipe breaks in the auxiliary building. The specific design criteria is stated in the Updated Safety Analysis Report Section B.5 'Protection of Class I Items' and states that "Class I items are protected against damage from Rupture of a pipe or tank [TK] resulting in serious flooding or excessive steam release to the extent that the Class I function is impaired." The two RHR trains are not separated in a manner that would prevent simultaneous damage to both trains from a failure of a non-seismically qualified pipe.

The RHR pumps were declared inoperable when Kewaunee Power Station received the results of a Task Interface Agreement (TIA) from the Nuclear Regulatory Commission office of Nuclear Reactor Regulation titled, "Final Response to Task Interface Agreement 2005-10 Relating to Impact of Flooding on Residual Heat Removal (RHR) Pumps at Kewaunee Power Station (Task Interface Agreement (TIA) 2005-10)(TAC No. MC8937)." Dominion Energy Kewaunee (DEK) continues to assess this TIA to determine its applicability.

This event was reported under Event Number 42557 in accordance with 10CFR50.72(b)(3)(v)(B), "Any event that at the time of discovery could have prevented the fulfillment of the safety function of systems that are needed to remove residual heat."

Event Analysis and Safety Significance:

This is being reported in accordance with 10 CFR 50.73(a)(2)(v)(B), "Any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to remove residual heat" and 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications."

The station was in intermediate shutdown (average reactor coolant temperature greater than 200 degrees and less than 540 degrees Fahrenheit and zero percent fission power) when the condition was identified. Although both trains of residual heat removal pumps were inoperable, the Technical Specification requirement for decay heat removal capability was being met with two steam generators operable to remove decay heat.

The safety significance of this event is being assessed. DEK is continuing to review the TIA to determine its applicability to the station's design basis.

This is being reported as a safety system functional failure as an event or condition that could have prevented the fulfillment of the safety function of structures or systems needed to remove residual heat.

Cause:

When the results of the review of the TIA are completed this LER will be updated.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

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|-------------------------------|-------------------|----------------|----------------------|--------------------|---------------|
| Kewaunee Power Station | 05000305 | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | 3 of 3 |
| | | 2006 | -- | 003 | |

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Corrective Actions:

1. A design change was completed to install residual heat removal pump flood barriers.
2. DEK is continuing to review the TIA to determine its applicability to the station's design basis.

Similar Events:

LER 2005-004-01, Safe Shutdown Potentially Challenged By Unanalyzed Internal Flooding Events and Inadequate Design.