



AUG 11 2006

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

Serial No. 06-666
KPS/LIC/RS: RO
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
LICENSEE EVENT REPORT 2006-007-00

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. 50-305/2006-007-00

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 Sattler at (920) 388-8121.

Very truly yours,

for
Leslie N. Hartz
Site Vice President, Kewaunee Power Station

Attachment

IE22

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

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)

RCS RTD cross calibration procedure has the potential to exceed the TS LCO allowed time limit

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
6	13	2006	2006	-- 007 --	00	8	11	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)		100	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)			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 Sattler - Licensing

TELEPHONE NUMBER (Include Area Code)

(920) 388-8121

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)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT

On June 13, 2006, with the station at approximately 100% power, it was determined (by procedure review), that surveillance procedure SP-47-310, Reactor Coolant System RTD Cross Calibration, has the potential to exceed the 24 hr allowable Limiting Condition for Operation (LCO) of item 2.b of Tech Spec Table 3.5-4 (Instrument Operating Conditions For Isolation Functions).

The surveillance procedure removes all four narrow range channels of RCS temperature from service during plant heatup, thus rendering all channels of Tav_g inoperable. Item 2.b of Technical Specification Table 3.5-4 (Instrument Operating Conditions For Isolation Functions), requires at least 1 operable channel for the function (Hi Steam Flow and 2 of 4 Lo-Lo Tav_g with Safety Injection). With less than the minimum channels operable, the LCO requires that the plant be placed in HOT SHUTDOWN. If the minimum conditions are not met within 24 hours, the LCO requires the plant be placed in a COLD SHUTDOWN condition. Therefore, if this surveillance procedure renders Tav_g inoperable for greater than 24 hours, and plant heatup continues, the LCO is not met.

Corrective actions included immediately placing the procedure on Administrative Hold and initiating paperwork to revise the procedure steps and develop additional resources to reduce the time required for performance to within the allowable 24 hours.

This event is deemed to have no safety significance and does not constitute a safety system functional failure.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)			PAGE (3)
Kewaunee Power Station		05000305		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 of 3
				2006	-- 007	-- 00	

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

Event Description:

On June 13, 2006, with the station at approximately 100% power, it was determined that Surveillance Procedure SP-47-310, Reactor Coolant System RTD Cross Calibration, has the potential to exceed the 24 hours allowable LCO time.

This surveillance procedure removes all four narrow range channels of RCS [AB] temperature from service during plant heatup, (from approximately 350 degrees F to 500 degrees F), thus rendering all channels of Tavg inoperable. Item 2.b of Technical Specification Table 3.5-4 (Instrument Operating Conditions For Isolation Functions), requires at least 1 operable channel for the function (Hi Steam Flow and 2 of 4 Lo-Lo Tavg with Safety Injection). With less than the minimum channels operable, the LCO requires that the plant be placed in HOT SHUTDOWN. If the minimum conditions are not met within 24 hours, the LCO requires the plant be placed in a COLD SHUTDOWN condition. Therefore, if this surveillance procedure renders Tavg inoperable for greater than 24 hours, and plant heatup continues, the LCO is not met.

Historically, performance times for specific steps of SP-47-310 were not recorded, so the precise durations of Tavg inoperability can not be determined. It is conservatively assumed that all previous performances have exceeded the 24 hour limit. Consequently, when SP-47-310 was performed in November of 2004, station Technical Specification 3.5 was not met.

Event Analysis:

This event is being reported in accordance with 10CFR50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications."

This surveillance procedure removes all four narrow range channels of RCS temperature from service for data collection during a plant heatup at a starting temperature between 350 and 380 degrees F, over a minimum span of 150 degrees F, with at least one data set obtained at hot no-load conditions. During the procedure, the plant is not allowed to exceed Hot Shutdown conditions.

During the last three years this procedure was only performed once (during recovery from a refueling outage on November 23, 2004). For that performance, a precise determination of RTD [TE] (and thus Tavg) inoperability time could not be determined. Since the procedure was in progress for 68.6 hours, (by Control Room log entries), it is assumed that Tavg inoperability exceeded the 24 hour limit. The plant was not placed in COLD SHUTDOWN as required, which is a violation of TS 3.5.

There was no safety system function failure involved in this event.

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

Safety Significance:

There were no actual nuclear or radiation exposure consequences from this event.

The affected Tech Spec item is associated with the Engineered Safety Feature (ESF) steam line isolation. The function of the affected portion of steam line isolation is to isolate a faulty steam line during coincident conditions of safety injection signal, low-low Tavg, and high steam flow. Since both steam lines were isolated during the entire 68.8 hours of procedure performance, the function of the affected ESF system had already been met. Therefore, there was no safety significance for this event.

Cause:

Previous application of Technical Specification Table 3.5-4 was that Item 2.b did not apply when the ESF function was otherwise disabled. Therefore, since SI is blocked below 2000 psig during a heatup, the ESF function was disabled, and the Technical Specification item did not apply. During procedure review on June 13, 2006, it was determined that the Technical Specification item did apply.

Corrective Actions:

1. Placed Surveillance Procedure SP-47-310, Reactor Coolant System RTD Cross Calibration, on Administrative Hold until it is corrected.
2. The procedure will be revised to assure it is completed within the allowable 24 hours.

Similar Events:

None