



March 21, 2005

Serial No. 05-096
10 CFR §50.80
10 CFR 140

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

Re: Docket No. 50-305
Facility Operating License No. DPR-43
Kewaunee Nuclear Power Plant License Transfer
Documentary Evidence of Nuclear Liability Insurance

Ref.: Letter from C. F. Lyon of the U.S. NRC to David A. Christian of Dominion Energy Kewaunee, Inc. and Thomas Coutu of Nuclear Management Company, LLC dated June 10, 2004, "Kewaunee Nuclear Power Plant - Order Approving the Transfer of the Facility Operating License from Nuclear Management Company, LLC, Wisconsin Public Service Corporation, and Wisconsin Power and Light Company to Dominion Energy Kewaunee, Inc. (TAC No. MC1595)"

Pursuant to condition III(4) of the above referenced NRC Order approving the transfer of the Kewaunee Nuclear Power Plant from Nuclear Management Company, LLC, Wisconsin Public Service Corporation, and Wisconsin Power and Light Company to Dominion Energy Kewaunee, Inc. (DEK), the enclosure to this letter provides documentary evidence that DEK has obtained the appropriate amount of nuclear liability insurance required of licensees to satisfy the requirements for financial protection as set forth in the requirements of 10 CFR Part 140.

If you have any questions concerning this information, please contact Mr. Gary D. Miller of Dominion Resources Services, Inc., at (804) 273-2771.

Sincerely,

A handwritten signature in black ink, appearing to read "Eugene S. Grecheck".

Eugene S. Grecheck
Vice President – Nuclear Support Services
Dominion Energy Kewaunee, Inc.

cc: Mr. J. L. Caldwell
Regional Administrator
U.S. NRC Region III
2443 Warrenville Road
Suite 210
Lisle, Illinois 60532-4352

Mr. C. F. Lyon
NRC Kewaunee Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. R. G. Krsek
NRC Senior Resident Inspector
Kewaunee Power Station


Enclosure

Documentary Evidence of Nuclear Liability Insurance, Kewaunee Nuclear Power Plant,
Dominion Energy Kewaunee, Inc.

Affirmation

I, Eugene S. Grecheck, being duly sworn, state that I am the Vice President – Nuclear Support Services of Dominion Energy Kewaunee, Inc. (“Dominion Energy Kewaunee”), that I am authorized to sign and file this supplemental information with the Nuclear Regulatory Commission on behalf of Dominion Energy Kewaunee, and that the statements made and the matters set forth herein pertaining to Dominion Energy Kewaunee are true and correct to the best of my knowledge, information, and belief.


Dominion Energy Kewaunee, Inc.



Eugene S. Grecheck
Vice President – Nuclear Support Services

COMMONWEALTH OF Virginia
COUNTY OF Henrico

Subscribed and sworn to before me, a Notary Public, in and for the County and Commonwealth above named, this 21st day of March 2005.



My Commission Expires: 5/31/06

ENCLOSURE

Documentary Evidence of Nuclear Liability Insurance
Kewaunee Nuclear Power Plant

Dominion Energy Kewaunee, Inc.

Enclosure

Documentary Evidence of Nuclear Liability Insurance
Kewaunee Nuclear Power Plant

Policy or Certificate Number	Type of Policy or Certificate
NF-204	Facility Form
NW-586	Facility Worker Form
N-44	Secondary Financial Protection



UNDERWRITING DEPARTMENT
John Hoffman, Director

February 15, 2005

Mr. Ira Dinitz
Indemnity Specialist
U.S. Nuclear Regulatory Commission
Mail Stop 12D3
1 White Flint North
Rockville, MD 20852

Re: Kewaunee Nuclear Power Plant

Dear Ira,

This letter re-confirms that American Nuclear Insurers will write nuclear liability insurance for Dominion Energy Kewaunee, Inc., and insuring the Kewaunee Nuclear Power Plant in the Town of Carlton, Kewaunee County, Wisconsin. The insurance will coincide with Dominion Energy's acquisition of the Kewaunee plant from Wisconsin Public Service Corporation and Wisconsin Power & Light Company. The insurance is purchased to satisfy the requirements for financial protection as set forth in Section 170b. of the Atomic Energy Act of 1954, as amended, and the requirements of 10 CFR Part 140.

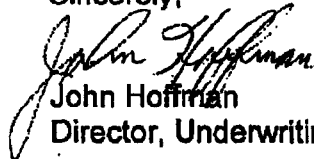
Effective on the closing date of the transaction, the insurance policy and certificates for the Kewaunee Nuclear Power Plant, currently issued to Wisconsin Public Service Corporation and Wisconsin Power & Light Company, will be amended as follows.

- Under Facility Form Policy NF-0204, the Named Insured and Operator of the facility will be changed to *Dominion Energy Kewaunee, Inc.*
- Under Facility Worker Form Certificate NW-0586, the Named Insured and Operator of the Facility will be changed to *Dominion Energy Kewaunee, Inc.*
- Under Secondary Financial Protection Certificate N-0044, the Named Insured will be changed to *Dominion Energy Kewaunee, Inc.*, which also will be added to the Bond for Payment of Retrospective Premiums.

Mr. Ira Dinitz
February 15, 2005
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This commitment to write nuclear liability insurance for Dominion Energy Kewaunee, Inc. remains valid through December 31, 2005. If the sale occurs after that date, we will review the circumstances before stating our willingness to provide insurance.

Sincerely,


John Hoffman
Director, Underwriting

c: Leslie Garber, Dominion
Mark Webster, Marsh

MARSH

Marsh USA Inc.

CERTIFICATE OF NUCLEAR ENERGY LIABILITY INSURANCE (FACILITY FORM)

This is to certify that there is (are) in force as of the effective date of this Certificate, Nuclear Energy Liability Insurance (Facility Form) Policy(ies) issued by members of the American Nuclear Insurers as indicated (Companies), to the Insured named herein, with respect to the Nuclear Facility at the Location shown. If any such policy is canceled or otherwise terminated prior to the end of December 31st of the calendar year in which the Effective Date of this Certificate occurs, the Companies will endeavor to mail or deliver 20 days written notice thereof to the Certificate Holder and this Certificate shall thereupon terminate; but failure to mail or deliver such notice shall impose no obligation or liability of any kind upon the Companies or their agents or representatives. Otherwise this Certificate shall terminate as of the end of such December 31st. A Certificate will NOT be issued for any subsequent calendar year unless requested in writing.

Name and Mailing Address of Insured:

Effective Date of this Certificate: January 1, 2005

Dominion Energy Kewaunee, Inc.
One James River Plaza
Richmond, VA 23261

<u>Policy Issued by Members of:</u>	<u>Policy Number:</u>	<u>Policy Effective:</u>	<u>Limit of Liability:</u>
ANI	NF-204	<u>January 1, 1972</u>	<u>\$300,000,000</u>

Name and Address of Certificate Holder:

Location of the Nuclear Facility (Site Description):

U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Director, Office of Nuclear Reactor Regulation

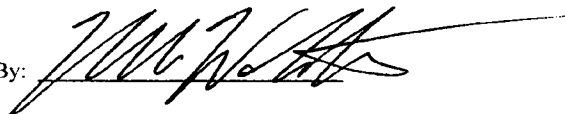
All premises including the land and all buildings and structures known as the Kewaunee Nuclear Power Plant and located on a site consisting of approximately 900 acres on the West shore of Lake Michigan, in the Town of Carlton, Kewaunee County, Wisconsin.

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.

The insurance afforded by the policy is subject to the exclusions, conditions and other provisions of the policy. Neither this certificate nor any contract or other document with respect to which it is issued shall amend, extend or alter the coverage afforded by the policy. Limits of Liability shown above may have been reduced by payment of claims or claims expenses.

Marsh USA Inc.

By:



10/28/2004
Date Signed

Mark A. Webster, Assistant Vice President
Name and Title

[Rev. 07/00]

MARSH

Marsh USA Inc.
100 N. Tryon Street, Suite 3200
Charlotte, NC 28202

CERTIFICATE OF NUCLEAR ENERGY LIABILITY INSURANCE (FACILITY WORKER FORM)

This is to certify that there is in force as of the effective date of this Certificate of Insurance a Certificate to the Master Worker Policy (Nuclear Energy Liability Policy (Facility Worker Form)) issued by members of American Nuclear Insurers as indicated (Companies), to the Insured named herein, with respect to the Nuclear Facility at the Location shown. If such policy is cancelled or otherwise terminated prior to the end of December 31st of the calendar year in which the Effective Date of this Certificate occurs, the Companies will endeavor to mail or deliver 20 days written notice thereof to the Certificate Holder and this Certificate shall thereupon terminate; but failure to mail or deliver such notice shall impose no obligation or liability of any kind upon the Companies or their agents or representatives. Otherwisethis Certificate shall terminate as of the end of such December 31st. A Certificate will **NOT** be issued for any subsequent calendar year unless requested in writing.

Name and Mailing Address of Insured:
Dominion Energy Kewaunee, Inc.
One James River Plaza
Richmond, VA 23261

Effective Date of this Certificate:
January 1, 2005

Policy Number:

NW-586

Policy Effective:

January 1, 1998

Limit of Liability:

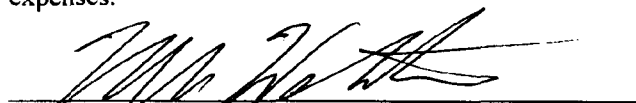
\$300,000,000 (Industry Aggregate)

Name and Address of Certificate Holder:
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Director, Office of Nuclear Reactor Regulation

Location of the Nuclear Facility (Site Description):
All premises including the land and all buildings and structures known as the Kewaunee Nuclear Power Plant and Attn: located on a site consisting of approximately 900 acres on the West shore of Lake Michigan, in the Town of Carlton, Kewaunee County, Wisconsin.

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.

The insurance afforded by the policy is subject to the exclusions, conditions and other provisions of the policy. Neither this Certificate nor any contractor other document with respect to which it is issued shall amend, extend or alter the coverage afforded by the policy. The Limit of Liability shown above may have been reduced by payment of claims or claims expenses.



Signature of Authorized Person

10/29/04

Date Signed

Mark Webster, Assistant Vice President

Name and Title of Authorized Person

MARSH

Marsh USA Inc.
100 N. Tryon Street, Suite 3200
Charlotte, NC 28202

CERTIFICATE OF NUCLEAR ENERGY LIABILITY INSURANCE (SECONDARY FINANCIAL PROTECTION)

This is to certify that there is in force as of the effective date of this Certificate a Nuclear Energy Liability Insurance (Secondary Financial Protection) Policy issued by members of American Nuclear Insurers as indicated (Companies), to the Insured named herein, with respect to the Nuclear Facility at the Location shown. If such policy is cancelled or otherwise terminated prior to the end of December 31st of the calendar year in which the Effective Date of this Certificate occurs, the Companies will endeavor to mail or deliver 20 days written notice thereof to the Certificate Holder and this Certificate shall thereupon terminate; but failure to mail or deliver such notice shall impose no obligation or liability of any kind upon the Companies or their agents or representatives. Otherwise this Certificate shall terminate as of the end of such December 31st. A Certificate will **NOT** be issued for any subsequent calendar year unless requested in writing.

Name and Mailing Address of Insured:

Dominion Energy Kewaunee, Inc.
One James River Plaza
Richmond, VA 23261

Effective Date of this Certificate:

January 1, 2005

Policy Number:

N-44

Policy Effective:

August 1, 1977

Limit of Liability:

As determined by Price Anderson
Provision of the Atomic Energy
Act of 1954 as amended

Location of the Nuclear Facility (Site Description):

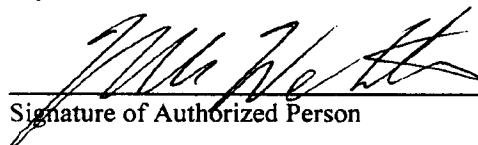
All premises including the land and all buildings and structures known as the Kewaunee Nuclear Power Plant and located on a site consisting of approximately 900 acres on the West shore of Lake Michigan, in the Town of Carlton, Kewaunee County, Wisconsin.

Name and Address of Certificate Holder:

U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Director, Office of Nuclear Reactor Regulation

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.

The insurance afforded by the policy is subject to the exclusions, conditions and other provisions of the policy. Neither this Certificate nor any contractor other document with respect to which it is issued shall amend, extend or alter the coverage afforded by the policy. The Limit of Liability shown above may have been reduced by payment of claims or claims expenses.



Signature of Authorized Person

10/29/04

Date Signed

Mark Webster, Assistant Vice President

Name and Title of Authorized Person