



September 15, 2005

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Serial No. 05-447  
NLOS/GDM R7  
Docket No. 50-305  
License No. DPR-43

**DOMINION ENERGY KEWAUNEE, INC.**  
**KEWAUNEE POWER STATION**  
**ENDORSEMENT AND ADOPTION OF LICENSING ACTIONS**

By letter dated June 10, 2004, the Nuclear Regulatory Commission (NRC) issued an Order approving the transfer of Facility Operating License DPR-43 held by Wisconsin Public Service Corporation (WPSC), Wisconsin Power and Light Company (WPL), and Nuclear Management Company, LLC, (NMC) for Kewaunee Nuclear Power Plant (KNPP) to Dominion Energy Kewaunee, Inc. (DEK). By letter dated July 5, 2005, the NRC issued Amendment 185 to Facility Operating License DPR-43 for Kewaunee. This conforming amendment reflects the transfer of the operating license to DEK and documents the change of the station's name from KNPP to Kewaunee Power Station (Kewaunee).

Prior to the transfer of the operating license to DEK, NMC, acting on behalf of WPSC and WPL, made docketed submittals to the NRC that requested specific licensing actions. These licensing actions include items such as license amendment requests, relief requests, exemption requests, etc. Furthermore, DEK previously stated in the December 19, 2003 license transfer application (Serial No. NRC-03-127) that upon transfer of ownership DEK would assume Kewaunee's current regulatory commitments. With four clarifications, as detailed below, DEK endorses and adopts the docketed submittals previously made by NMC, WPSC and/or WPL for Kewaunee.

The clarifications refer to the letter from Mr. C. W. Lambert of NMC to the NRC dated March 18, 2005 (Serial No. NRC-05-035) entitled, "Kewaunee Improvement Initiatives – Commitments." Even though the commitments included in this letter were made by NMC, when they were the licensed operator of Kewaunee, DEK will continue to abide by the commitments with these four clarifications.

The first clarification concerns commitment 1.a included in Enclosure 1 of the letter, which stated that Kewaunee would "Implement [the] NMC Fleet Operations Mentoring Program to Improve Conduct of Operations." This commitment was completed prior to startup from the Spring 2005 forced outage with the exception of the commitment to perform a follow-up assessment for an effectiveness review in the third quarter of 2005. DEK will perform this assessment as committed. However, as a point of clarification,

since Kewaunee is now owned by DEK and is no longer part of the NMC fleet, DEK does not commit to the implementation of the NMC Fleet Operations Mentoring Program going forward. Continued improvement in the conduct of operations will be effected by DEK through the communication and reinforcement of management expectations, adherence to company standards and procedures and training.

The second clarification concerns commitment 5.b. Specifically, the completion date provided in the fourth column for the safety systems' licensing bases documentation and validation effort (3Q07) is not consistent with the completion date (4Q07) provided in the fifth column. Consequently, the completion date for commitment 5.b is revised to the fourth quarter of 2007 for consistency.

The third clarification concerns commitment 5.c. In the fifth column titled "Methods to Verify Objective Met," the third bulleted item, "Effectiveness Review," does not include a completion period. The third bulleted item should be revised to state, "Effectiveness Review 2Q06."

The final clarification concerns commitment 11.a, which states that the Kewaunee "Picture of Excellence" would be communicated to employees to help facilitate sustained performance improvement. This topic was subsequently renamed and is being presented to the Kewaunee employees as the Kewaunee "Passion for Excellence" and performs the function of improving accountability and human behaviors.

With the four clarifications noted, DEK endorses and adopts the docketed submittals previously made by NMC, WPSC, and WPL for Kewaunee and requests that the NRC continue to process and disposition licensing actions previously docketed and requested for Kewaunee.

If you have any questions or require additional information, please contact Mr. Gerald O. Riste at (920) 388-8424.

Very truly yours,



E. S. Grecheck  
Vice President – Nuclear Support Services

Commitment contained in this letter:

1. With the four clarifications to the commitments made in the letter from Mr. C. W. Lambert of NMC to the NRC dated March 18, 2005 (Serial No. NRC-05-035), DEK endorses and adopts the docketed submittals previously made by NMC, WPSC and/or WPL for Kewaunee.

cc: Regional Administrator, Region III  
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