



September 25, 2006

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

Serial No. 06-489
KPS/LIC/GR: R3
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
LICENSE AMENDMENT REQUEST - 221
ASME CODE REFERENCE UPDATE

Pursuant to 10 CFR 50.90, Dominion Energy Kewaunee, Inc. (DEK) requests an amendment to Facility Operating License Number DPR-43 for Kewaunee Power Station (Kewaunee). This amendment will revise Kewaunee TS 4.2.a, "ASME Code Class 1, 2, 3, and MC Components and Supports." The revised TS 4.2.a, Item 2, will reference the American Society of Mechanical Engineers Code for Operation and Maintenance, as required by the current revision of 10 CFR 50.55a(f).

DEK has reviewed this proposed change against the criteria found in 10 CFR 50.92, "Issuance of Amendment." A "No Significant Hazards Consideration" is justified because the change results in a net improvement in the measures for in-service testing of pumps and valves. This proposed amendment is consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) change to the Standard Technical Specifications (STS), TSTF-479-A, "Changes to Reflect Revision of 10 CFR 50.55a."

DEK requests approval of the proposed amendment by July 13, 2007. DEK also requests a 60-day implementation period once this amendment is approved.

Attachment 1 to this letter contains a description, a safety evaluation, a significant hazards determination, and environmental considerations for the proposed changes. Attachment 2 contains the marked-up Technical Specification pages. Attachment 3 contains the proposed Technical Specification pages as revised.

The Kewaunee Plant Operations Review Committee has approved this proposed change and a copy of this letter, with attachments, has been provided to the designated Wisconsin official in accordance with 10 CFR 50.91(b).

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

Very truly yours,

A handwritten signature in black ink, appearing to read "Gerald T. Bischof".

Gerald T. Bischof
Vice President – Nuclear Engineering

Attachments:

1. Discussion of Change, Safety Evaluation, Significant Hazards Determination and Environmental Considerations
2. Marked-up TS Page for License Amendment Request 221
3. Affected TS Page for License Amendment Request 221

Commitments made in this letter: None

cc: Regional Administrator
U. S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road
Suite 210
Lisle, Illinois 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

Public Service Commission of Wisconsin
Electric Division
P.O. Box 7854
Madison, WI 53707

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Gerald T. Bischof, who is Vice President – Nuclear Engineering of Dominion Energy Kewaunee, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 25TH day of September, 2006.

My Commission Expires: May 31, 2010.

Vicki L. Hull
Notary Public

(SEAL)

ATTACHMENT 1

LICENSE AMENDMENT REQUEST – 221

ASME CODE REFERENCE UPDATE

**DISCUSSION OF CHANGE, SAFETY EVALUATION, SIGNIFICANT HAZARDS
DETERMINATION AND ENVIRONMENTAL CONSIDERATIONS**

KEWAUNEE POWER STATION

DOMINION ENERGY KEWAUNEE, INC.

LICENSE AMENDMENT REQUEST - 221
ASME CODE REFERENCE UPDATE

INTRODUCTION

Pursuant to 10 CFR 50.90, Dominion Energy Kewaunee, Inc. (DEK) requests an amendment to Facility Operating License Number DPR-43 for Kewaunee Power Station (Kewaunee). The proposed LAR would revise Kewaunee Power Station (Kewaunee) Technical Specification (TS) 4.2.a.2 regarding in-service testing of ASME Code Class 1, Class 2 and Class 3 pumps and valves. The LAR updates a reference to the American Society of Mechanical Engineers (ASME) Code for consistency with the requirements of 10 CFR 50.55a.

1.0 DESCRIPTION

The proposed amendment would revise Kewaunee TS 4.2.a.2 regarding in-service testing of ASME Code Class 1, Class 2, and Class 3 pumps and valves. The revision updates references to the ASME Code from Section XI of the ASME Boiler and Pressure Vessel Code to the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) consistent with the requirements of 10 CFR 50.55a.

This proposed amendment is consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) change to the Standard Technical Specifications (STS), TSTF-479-A, "Changes to Reflect Revision of 10 CFR 50.55a."

2.0 PROPOSED CHANGE

The proposed change will revise 4.2.a.2 regarding in-service testing of ASME Code Class 1, Class 2 and Class 3 pumps and valves.

TS 4.2.a.2, currently reads:

"In-service testing of ASME Code Class 1, Class 2 and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(f), except where relief has been granted by the Commission pursuant to 10 CFR 50.55a(f)(6)(i)."

DEK proposes to change TS 4.2.a.2, to read:

“In-service testing of ASME Code Class 1, Class 2 and Class 3 pumps and valves shall be performed in accordance with the ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda as required by 10 CFR 50.55a(f), except where relief has been granted by the Commission pursuant to 10 CFR 50.55a(f)(6)(i).”

3.0 BACKGROUND

In 1990, the ASME published the initial edition of the ASME OM Code, which includes rules for in-service testing of pumps and valves. The ASME intended that the ASME OM Code replace Section XI of the Boiler and Pressure Vessel Code for in-service testing of pumps and valves.

4.0 TECHNICAL ANALYSIS

The purpose of the in-service testing programs are to assess the operational readiness of pumps and valves, to detect degradation that might affect component operability, and to maintain safety margins with provisions for increased surveillance and corrective action. NRC regulation 10 CFR 50.55a defines the requirements for applying industry codes to each licensed nuclear powered facility. Licensees are required by 10 CFR 50.55a(f)(4)(i) to prepare programs to perform in-service testing of certain ASME Code Class 1, 2, and 3 pumps and valves during the initial 120-month interval. The regulations require that programs be developed using the latest edition and addenda incorporated into paragraph (b) of 10 CFR 50.55a on the date 12 months prior to the date of issuance of the operating license subject to the limitations and modification identified in paragraph (b). NRC regulations also require that the in-service testing programs be revised during successive 120-month intervals to comply with the latest edition and addenda of the Code incorporated by reference in paragraph (b) 12 months prior to the start of the interval.

Section XI of the ASME Code has been revised on a continuing basis over the years to provide updated requirements for the in-service inspection and in-service testing of components. The ASME Code requirements addressing the in-service testing of pumps and valves were contained in Section XI, Subsections IWP (pumps) and IWV (valves). In the 1998 Edition with the 2000 Addenda, all requirements for testing pumps and valves were removed from Section XI and located in the ASME Code for Operation and Maintenance of Nuclear Power Plants. As identified in NRC SECY-99-017, dated January 13, 1999, the NRC has generally considered the evolution of the ASME Code to result in a net improvement in the measures for inspecting piping and components and testing pumps and valves.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

Dominion Energy Kewaunee, Inc. has evaluated whether or not a significant hazards consideration is involved with the proposed generic change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed change revises the Kewaunee Power Station (Kewaunee) Technical Specification (TS) TS 4.2.a.2 regarding in-service testing of ASME Code Class 1, Class 2 and Class 3 pumps and valves. The proposed change revises the TS to be consistent with the requirements of 10 CFR 50.55a(f)(4) for pumps and valves which are classified as American Society of Mechanical Engineers (ASME) Code Class 1, Class 2 and Class 3. The proposed change incorporates revisions to the ASME Code that result in a net improvement in the measures for in-service testing of pumps and valves.

As a net improvement in the in-service testing of pumps and valves, the proposed change does not negatively impact any accident initiators, analyzed events, or assumed mitigation of accident or transient events. It does not involve the addition or removal of any equipment, or any design changes to the facility. Therefore, this proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed change revises Kewaunee TS 4.2.a.2 regarding in-service testing of ASME Code Class 1, Class 2 and Class 3 pumps and valves, for consistency with the requirements of 10 CFR 50.55a(f)(4). The proposed change incorporates revisions to the ASME Code that result in a net improvement in the measures for testing pumps and valves.

The proposed change does not involve a modification to the physical configuration of the plant (i.e., no new equipment will be installed) or adversely affect methods governing normal plant operation. The proposed change will not impose any new or different requirements or introduce a new

accident initiator, accident precursor, or malfunction mechanism. The proposed change does not alter existing test criteria or frequencies. Additionally, there is no change in the types or increases in the amounts of any effluent that may be released off-site and there is no increase in individual or cumulative occupational exposure. Therefore, this proposed change does not create the possibility of an accident of a different kind than previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

No. The proposed change revises TS 4.2.a.2 regarding in-service testing of ASME Code Class 1, Class 2, and Class 3 pumps and valves, for consistency with the requirements of 10 CFR 50.55a(f)(4). The proposed change incorporates revisions to the ASME Code that result in a net improvement in the measures for testing pumps and valves. The safety function of the affected pumps and valves will continue to be confirmed through testing. Therefore, this proposed change does not involve a significant reduction in a margin of safety.

5.2 Applicable Regulatory Requirements/Criteria

NRC regulation, 10 CFR 50.55a, defines the requirements for applying industry codes to each licensed nuclear powered facility. Licensees are required by 10 CFR 50.55a(f)(4)(i) to prepare programs to perform in-service testing of certain ASME Section III, Code Class 1, 2, and 3 pumps and valves during the initial 120-month interval. The regulations require that programs be developed using the latest edition and addenda incorporated into paragraph (b) of 10 CFR 50.55a on the date 12 months before the date of issuance of the operating license, subject to the limitations and modifications identified in 10 CFR 50.55a (b). 10 CFR 50.55a(f)(4)(ii) requires licensees to comply with the requirements of the latest edition and addenda of the code incorporated by reference in 10 CFR 50.55a(b) 12 months before the start of successive 120-month intervals, subject to the limitations and modifications in 10 CFR 50.55a(b).

Therefore, because the change continues to meet NRC regulations:

- 1) There is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner;
- 2) Such activities will be conducted in compliance with the Commission's regulations, and;
- 3) Issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed change would change a requirement with respect to installation or use of a facility component located within the restricted areas, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve;

- (i) A significant hazards consideration;
- (ii) A significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or;
- (iii) A significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

7.0 REFERENCES

- 7.1. 10 CFR 50.55a.
- 7.2. SECY-99-017, "Proposed Amendment to 10 CFR 50.55a."
- 7.3. NUREG-1482, "Guidelines for In-service Testing at Nuclear Power Plants."
- 7.4. Technical Specification Task Force, Improved Standard Technical Specifications Change Traveler, TSTF-479-A, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a."

ATTACHMENT 2

**LICENSE AMENDMENT REQUEST – 221
ASME CODE REFERENCE UPDATE**

MARKED-UP TS PAGE FOR LICENSE AMENDMENT REQUEST 221

KEWAUNEE POWER STATION

MARKED-UP TS PAGE:

TS 4.2-1

DOMINION ENERGY KEWAUNEE, INC.

4.2 ASME CODE CLASS IN-SERVICE INSPECTION AND TESTING

APPLICABILITY

Applies to in-service structural surveillance of the ASME Code Class components and supports and functional testing of pumps and valves.

OBJECTIVE

To assure the continued integrity and operational readiness of ASME Code Class 1, 2, 3, and MC components.

SPECIFICATION

- a. ASME Code Class 1, 2, 3, and MC Components and Supports
 1. In-service inspection of ASME Code Class 1, Class 2, Class 3, and Class MC components and supports shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g), except where relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). The testing and surveillance of shock suppressors (snubbers) is detailed in TS 3.14 and TS 4.14.
 2. In-service testing of ASME Code Class 1, Class 2 and Class 3 pumps and valves shall be performed in accordance with the ASME Code for Operation and Maintenance of Nuclear Power Plants Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(f), except where relief has been granted by the Commission pursuant to 10 CFR 50.55a(f)(6)(i).
 3. Surveillance testing of pressure isolation valves:
 - a. Periodic leakage testing⁽¹⁾ on each valve listed in Table TS 3.1-2 shall be accomplished prior to entering the OPERATING mode after every time the plant is placed in the COLD SHUTDOWN condition for refueling, after each time the plant is placed in a COLD SHUTDOWN condition for 72 hours if testing has not been accomplished in the preceding 9 months, and prior to returning the valve to service after maintenance, repair, or replacement work is performed.

⁽¹⁾To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria.

ATTACHMENT 3

**LICENSE AMENDMENT REQUEST – 221
ASME CODE REFERENCE UPDATE**

AFFECTED TS PAGE FOR LICENSE AMENDMENT REQUEST 221

KEWAUNEE POWER STATION

AFFECTED TS PAGE:

TS 4.2-1

DOMINION ENERGY KEWAUNEE, INC.

4.2 ASME CODE CLASS IN-SERVICE INSPECTION AND TESTING

APPLICABILITY

Applies to in-service structural surveillance of the ASME Code Class components and supports and functional testing of pumps and valves.

OBJECTIVE

To assure the continued integrity and operational readiness of ASME Code Class 1, 2, 3, and MC components.

SPECIFICATION

- a. ASME Code Class 1, 2, 3, and MC Components and Supports
 1. In-service inspection of ASME Code Class 1, Class 2, Class 3, and Class MC components and supports shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g), except where relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). The testing and surveillance of shock suppressors (snubbers) is detailed in TS 3.14 and TS 4.14.
 2. In-service testing of ASME Code Class 1, Class 2 and Class 3 pumps and valves shall be performed in accordance with the ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda as required by 10 CFR 50.55a(f), except where relief has been granted by the Commission pursuant to 10 CFR 50.55a(f)(6)(i).
 3. Surveillance testing of pressure isolation valves:
 - a. Periodic leakage testing⁽¹⁾ on each valve listed in Table TS 3.1-2 shall be accomplished prior to entering the OPERATING mode after every time the plant is placed in the COLD SHUTDOWN condition for refueling, after each time the plant is placed in a COLD SHUTDOWN condition for 72 hours if testing has not been accomplished in the preceding 9 months, and prior to returning the valve to service after maintenance, repair, or replacement work is performed.

⁽¹⁾ To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria.