



May 4, 2007

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

Serial No. 06-140B  
KPS/LIC/CDS: R1  
Docket No. 50-305  
License No. DPR-43

**DOMINION ENERGY KEWAUNEE, INC.**  
**KEWAUNEE POWER STATION**  
**CORRECTION OF RESPONSE TO NRC REQUEST FOR ADDITIONAL**  
**INFORMATION REGARDING LICENSE AMENDMENT REQUEST 215,**  
**"MODIFICATION OF INTERNAL FLOODING DESIGN BASIS"**

Pursuant to 10 CFR 50.90, Dominion Energy Kewaunee, Inc. (DEK) submitted a request for approval of a proposed amendment to the Kewaunee Power Station (KPS) Updated Safety Analysis Report (USAR) (reference 1). The proposed amendment would clarify design criteria associated with internal flooding in the KPS USAR.

Subsequently, the Nuclear Regulatory Commission (NRC) submitted a request for additional information (RAI) to DEK regarding the proposed amendment. The RAI questions and associated DEK responses were submitted to NRC by letter dated April 17, 2007 (reference 2). It was later discovered that this response contained an incorrect reference. Specifically, the RAI response, Attachment 1, reference 5 contains a copy of Section B.5 of the KPS Updated Safety Analysis Report. Reference 5 should have contained a copy of Section B.5 of the KPS Final Safety Analysis Report. Attachment 1 to this letter contains the appropriate replacement pages.

If you have any questions or require additional information, please contact Mr. Craig Sly at (804) 273-2784. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

Very truly yours,

  
Gerald T. Bischof  
Vice President - Nuclear Engineering

Commitments made by this letter: None.

References:

1. Letter from Leslie Hartz (DEK) to Document Control Desk, "License Amendment Request 215 – Modification of Internal Flooding Design Basis," dated March 17, 2006.
2. Letter from E. S. Grecheck (DEK) to Document Control Desk, "Response to NRC Request for Additional Information Regarding License Amendment Request 215, 'Modification of Internal Flooding Design Basis,'" dated April 17, 2007.

Attachments:

1. Response to NRC Request for Additional Information Regarding Kewaunee License Amendment Request 215, Corrected Pages Related to Reference 5.

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

Ms. M. H. Chernoff  
U.S. Nuclear Regulatory Commission  
Mail Stop 8 G9A  
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 4<sup>th</sup> day of May, 2007.

My Commission Expires: May 31, 2010.

Vicki L. Hull  
Notary Public

(SEAL)

**ATTACHMENT 1**

**RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION REGARDING  
KEWAUNEE LICENSE AMENDMENT REQUEST 215**

**CORRECTED PAGES RELATED TO REFERENCE 5**

**The following replacement pages are provided:**

**References:**

(Replaces DEK Letter No. 06-140A, Attachment 1, page 24 of 25)

**List of References included in this Attachment**

(Replaces one page in DEK Letter No. 06-140A, Attachment 3)

**Reference 5, Kewaunee Final Safety Analysis Report Section B.5, Protection of  
Class I Items**

(Replaces reference 5 cover page and attached reference from DEK Letter No. 06-140A, Attachment 3)

**KEWAUNEE POWER STATION**

**DOMINION ENERGY KEWAUNEE, INC.**

**References:**

**I. References from NRC Request for Additional Information Questions**

- (A) Letter from Leslie Hartz (DEK) to Document Control Desk, "License Amendment Request 215 – Modification of Internal Flooding Design Basis," dated March 17, 2006.
- (B) Letter from E.W. James (WPSC) to R.C. DeYoung (NRC), "WPS Review of Non-Category I (Seismic Equipment)," dated October 31, 1972.

**II. References from Request for Additional Information Responses**

\*\* Indicates that this reference is provided in Attachment 3 to this document.

1. Letter from Leslie Hartz (DEK) to Document Control Desk, "License Amendment Request 215 – Modification of Internal Flooding Design Basis," dated March 17, 2006.
2. Letter from R. C. DeYoung (AEC) to E. W. James (WPSC), dated September 26, 1972.
3. Letter from E. W. James (WPSC) to R.C. DeYoung (NRC), "WPS Review of Non-Category I (Seismic Equipment)," dated October 31, 1972.
4. Multi-Plant Generic Issue B-11, "Susceptibility of Safety Related Systems to Flooding Caused by Failure of Non-Class 1 Systems."
5. Kewaunee Final Safety Analysis Report, Section B.5, Protection of Class I Items.
6. Generic Letter 89-18, "Resolution of Unresolved Safety Issue A-17, Systems Interactions in Nuclear Power Plants," dated September 6, 1989.
7. Generic Letter 88-20, "Individual Plant Examinations for Severe Accident Vulnerabilities – 10 CFR 50.54 (f)," dated November 23, 1988.
8. NUREG-1435, Supplement 4, "Status of Safety Issues at Licensed Power Plants," published December 1994.
9. NRC Temporary Instruction 2515/88, "Inspection of Licensee Actions Taken to Implement NRC Guidelines for Protection from Flooding of Equipment Important to Safety," dated April 6, 1987. \*\*
10. Memorandum from E. M. Hackett (NRC) to M. A. Satorius (NRC), "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)," dated May 5, 2006. \*\*
11. E-mail from D. Jaffe (NRC) to T. Breene (KPS) dated November 17, 2006.
12. Pioneer Engineering & Services Memorandum/Telephone Log, Protection of Reactor Protection System and Engineered Safety Features from Pipe Rupture, Jet Impingement, or Pipe Whip Reactions," dated September 25, 1972. \*\*

**List of References included in this Attachment**

1. Not Included.
2. Not Included.
3. Not Included.
4. Not Included.
5. Kewaunee Final Safety Analysis Report Section B.5, Protection of Class I Items. |
6. Not Included.
7. Not Included.
8. Not Included.
9. NRC Temporary Instruction 2515/88, "Inspection of Licensee Actions Taken to Implement NRC Guidelines for Protection from Flooding of Equipment Important to Safety," dated April 6, 1987.
10. Memorandum from E. M. Hackett (NRC) to M. A. Satorius (NRC), "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)," dated May 5, 2006.
11. Not Included.
12. Pioneer Engineering & Services Memorandum/Telephone Log, Protection of Reactor Protection System and Engineered Safety Features from Pipe Rupture, Jet Impingement, or Pipe Whip Reactions," dated September 25, 1972.
13. Not Included.
14. Not Included.
15. Not Included.
16. Attachment Only - NUREG-1174, "Evaluation of Systems Interactions in Nuclear Power Plants, Technical Findings Related to Unresolved Safety Issue A-17," dated May 1, 1989.
17. Not Included.
18. Not Included.
19. Letter from S. A. Varga (NRC) to D. C. Hintz (WPSC), dated September 6, 1985.
20. Not included.

**Reference 5**

**Kewaunee Final Safety Analysis Report Section B.5, Protection of Class I Items |**

**B.5     PROTECTION OF CLASS I ITEMS**

The Class I items are protected against damage from:

- a. Rupture of a pipe or tank resulting in serious flooding or excessive steam release to the extent that the Class I function is impaired.
- b. Pipe whip and steam/water jets following a pipe rupture of an adjacent pipe.
- c. Earthquakes, by having the ability to sustain seismic accelerations adopted for purposes of plant design without loss of function. Protection from interaction with the surrounding buildings is accomplished by providing a separating joint of sufficient size for earthquake displacements. Unless the building is designed to Class I seismic design, an analysis is made to demonstrate that it will not collapse; otherwise, the systems are protected locally.
- d. Tornado wind loads.
- e. Other natural hazards. Examples of these hazards are seiche and ice.
- f. Fire, in such a way that fire and operation of fire-fighting equipment does not cause damage to redundant parts of the system.
- g. Missiles from different sources. These sources comprise:
  - (i) Tornado created missiles.
  - (ii) Missiles from components containing moving parts which could be subjected to overspeed. (Potential sources for such missiles are turbines, turbine generators, and diesel generators)

(iii) Missiles from high-pressure steam and feedwater piping. These missiles are limited to non-back-seated valve stems and parts bolted to valves with bolts smaller than 3".

No protection is required if the factors described under a, b, f and g cannot affect any Class I systems, or if redundant systems are provided and the physical separation of these systems is sufficient to prevent these factors from damaging both systems. Under c and d, redundancy and physical separation may decrease the requirement for protection. If redundancy and physical separation are not used, and if the surrounding building is not designed as a missile barrier, missile protection by shielding is necessary, either by shielding the source itself or by shielding the system.