



July 2, 2007

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

Serial No. 07-0261
NL&OS/KP: R4
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
LICENSE AMENDMENT REQUEST - 223
SUBJECT: DELETION OF LICENSE CONDITION 2.C (5), FUEL BURNUP

Pursuant to 10 CFR 50.90, Dominion Energy Kewaunee, Inc. (DEK) requests an amendment to Facility Operating License (OL) number DPR-43 for Kewaunee Power Station (KPS). The proposed amendment would delete KPS OL condition 2.C (5), "Fuel Burnup," which restricts maximum rod average burnup to 60 giga-watt days per metric ton uranium (GWD/MTU) until completion of an NRC environmental assessment supporting an increased limit. Deletion of this OL condition will provide DEK the opportunity to increase maximum rod average burnup to as high as 62 GWD/MTU in the future and allow fuel management flexibility. The proposed amendment is justified based on the following:

1. The NRC has completed an environmental assessment supporting lead rod average burnup limits of up to 62 GWD/MTU.
2. Adequate controls currently exist in KPS fuel design and evaluation processes to ensure maximum rod average burnup is limited to 62 GWD/MTU, unless prior NRC review and approval is obtained.
3. The NRC has recently reviewed the generic fuel evaluation criteria and models applicable to KPS. This review concluded the models are valid to a burnup of up to 62 GWD/MTU and that all analytical requirements involving specified acceptable fuel design limits, loss of coolant accidents, and anticipated operational occurrences were met up to a burnup limit of 62 GWD/MTU.
4. The NRC recently approved use of Westinghouse fuel that references WCAP-12610, "VANTAGE+ Fuel Assembly Reference Core Report" and WCAP-10444, "Reference Core Report, VANTAGE 5 Fuel Assembly," to a burnup of 62 GWD/MTU, provided the fuel is analyzed with the Westinghouse Improved Performance and Analysis Design (PAD 4.0) code.

Attachment 1 to this letter contains a description, safety evaluation, significant hazards determination and environmental considerations for the proposed amendment. Attachment 2 contains the marked-up KPS OL, page 3. Attachment 3 contains the proposed new KPS OL page 3.

cc:

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Attachment 1

**LICENSE AMENDMENT REQUEST - 223
DELETION OF LICENSE CONDITION 2.C (5), FUEL BURNUP**

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

**KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.**

DELETION OF LICENSE CONDITION 2.C (5), FUEL BURNUP**DISCUSSION OF CHANGE, SAFETY EVALUATION, SIGNIFICANT HAZARDS
DETERMINATION AND ENVIRONMENTAL CONSIDERATIONS****INTRODUCTION**

Pursuant to 10 CFR 50.90 Dominion Energy Kewaunee, Inc (DEK) requests an amendment to the Kewaunee Power Station (KPS) Facility Operating License (DPR-43). The proposed amendment would remove KPS Operating License (OL) condition 2.C (5), "Fuel Burnup," which limits the maximum rod average burnup to 60 giga-watt days per metric ton of uranium (GWD/MTU) until completion of an NRC environmental assessment supporting an increased limit.

The proposed amendment qualifies for a no significant hazards consideration under the standards set forth in 10 CFR 50.92(c). The NRC has published an environmental assessment (Reference 1) that supports a maximum rod average burnup limit of up to 62 GWD/MTU. Adequate controls currently exist in the KPS fuel design and evaluation processes which ensure maximum rod average burnup will be limited to 62 GWD/MTU unless prior NRC review and approval is obtained. Dominion procedure, NF-AA-NAF-200, Revision 0, "Reload Management Process" (Reference 2) will be used by DEK to ensure that maximum rod burnup does not exceed 62 GWD/MTU.

1.0 DESCRIPTION

This letter is a request to amend the KPS Facility Operating License DPR-43. The proposed amendment would delete the current OL condition 2.C (5), "Fuel Burnup." KPS OL condition 2.C (5) limits the maximum rod average burnup for any rod in the core to 60 GWD/MTU until completion of an NRC environmental assessment supporting an increased limit. Deletion of OL condition 2.C (5) would allow for more effective fuel management and minimize the DEK and NRC resources needed to change rod average burnup limits in the future. Control of the maximum rod average burnup limit for KPS would continue to be maintained through current NRC approved fuel design and evaluation processes.

2.0 PROPOSED CHANGE

The proposed amendment would delete the current KPS OL condition 2.C (5), "Fuel Burnup," which states:

"The maximum rod average burnup for any rod shall be limited to 60 GWD/MTU until completion of an NRC environmental assessment supporting an increased limit."

The proposed change would replace the current verbiage of KPS OL condition 2.C (5) with the word "Deleted."

No changes to the KPS Technical Specifications (TS) or the TS Bases are necessary to support this amendment request.

3.0 BACKGROUND

On April 15, 1998, the former owner of KPS, Wisconsin Public Service Corporation (WPSC), requested an amendment to the Technical Specifications (Reference 3) to implement improvements related to a new fuel design (Reference 4). The proposed amendment reflected operation of the plant with a maximum rod average burnup limit of 62 GWD/MTU. In response to NRC concerns with some of the administrative changes and to expedite the amendment, WPSC submitted a revision to the proposed amendment on September 28, 1998 (Reference 5).

Subsequent discussions with the NRC staff indicated there was a need to address the environmental considerations of operation at the proposed burnup limit of 62 GWD/MTU. Specifically, in order to place KPS operation within the scope of the Environmental Assessment and Finding of No Significant Impact for extended burnup fuels published in the Federal Register on February 29, 1988, maximum rod average burnup had to be restricted to 60 GWD/MTU. The NRC requested, and WPSC agreed, to submit a license amendment request to condition the KPS OL with a maximum rod average burnup limit of 60 GWD/MTU until such time as the NRC staff completed an environmental assessment supporting an increased limit. By letter dated November 24, 1998, WPSC agreed to modify the proposed amendment to include a specific license condition limiting maximum average rod burnup to 60 GWD/MTU until completion of an NRC environmental assessment supporting an increased limit (Reference 13).

The KPS OL was modified by adding license condition 2.C (5), "Fuel Burnup," which states:

"The maximum rod average burnup for any rod shall be limited to 60 GWD/MTU until completion of an NRC environmental assessment supporting an increased limit."

NRC issued the license amendment on December 2, 1998 (Reference 6).

In January 2001, NRC published NUREG/CR-6703, "Environmental Effects of Extending Fuel Burnup Above 60 GWD/MTU." This document was prepared to assess the economic and environmental impact of extending maximum rod average burnup limits at operating plants. NUREG/CR-6703 concludes that there are no significant adverse environmental impacts related to increasing maximum rod average burnup limits to as high as 62 GWD/MTU.

On July 26, 2002, the former operator of KPS, Nuclear Management Company (NMC), submitted a license amendment request (Reference 7) to implement changes

necessary to accommodate Westinghouse 422 Vantage + nuclear fuel with Performance + features (422V+). Westinghouse 422V+ features include ZIRLO cladding, ZIRLO guide thimbles and instrument tubes, annular or solid pellets in the top and bottom axial blankets, and modifications for high burnup design. The 422 V+ fuel design is in accordance with NRC approved Topical Report WCAP-12610-P-A (Reference 12).

NRC approved the use of Westinghouse 422V+ fuel at KPS by letter dated April 4, 2003 (Reference 8). The Safety Evaluation included with this license amendment stated the following:

“The licensee evaluated the KNPP nuclear design bases and methodologies for the use of Westinghouse 422V+ fuel with PERFORMANCE+ features considering a core power level of 1772 MWt. The Westinghouse 422V+ fuel design was evaluated based on a lead rod burnup of up to 75 gigawatt days per metric ton uranium (GWD/MTU). Generating nuclear parameters and designing the fuel assemblies to 75 GWD/MTU is accomplished by considering mechanical aspects of the fuel such as irradiation growth and sizing of the fuel assembly/fuel rod. Currently, the licensee’s Facility Operating License DPR-43, paragraph 2.C (5) limits the maximum rod average burnup for any rod to 60 GWD/MTU. Accordingly, operation with the 422V+ fuel will be limited to the current KNPP TS licensed fuel burnup limit of 60 GWD/MTU; nonetheless, extension to 62 GWD/MTU may be possible based on Appendix R of WCAP-12488-A. Two design features of the 422V+ fuel which are not present in the current KNPP Framatome/ANP fuel include: (1) the use of ZIRLO material for fuel cladding, guide thimble tubes, instrumentation tubes, and LPD mid-grids, and (2) a reduced fuel stack height of 0.75 inches within the assembly. Use of the ZIRLO alloy allows additional flexibility in fuel management provided by increased lead rod burnups. The 422V+ fuel stack height reduction accommodates fission gas release for the extended burnup design.”

KPS uses the NRC-approved Westinghouse Improved Performance, Analysis and Design Model (PAD 4.0) code with NRC-approved models (References 10 and 11) to evaluate fuel rod performance and ensure the fuel meets its design criteria over its entire irradiation history. The NRC has approved use of PAD 4.0 for KPS. On April 24, 2000, NRC issued a Safety Evaluation Report related to use of the PAD 4.0 code (Reference 14). The SER concluded that PAD 4.0 is acceptable for licensing average rod burnups of up to 62 GWD/MTU.

The NRC staff recently conducted an audit of the Westinghouse Fuel Criteria Evaluation Process (FCEP) and concluded that the burnup limits for WCAP 12610-P-A can be increased to a maximum of 62 GWD/MTU provided that the evaluation of the fuel design performance is performed with PAD 4.0. The use of the 422V+ fuel design at Kewaunee is based on application of WCAP 12610-P-A and the PAD 4.0 models. However, since KPS OL condition 2.C (5) currently limits maximum rod average burnup to 60 GWD/MTU, the plant is not able to use the fuel to the full extent that would be supported by analysis performed using PAD 4.0.

4.0 TECHNICAL ANALYSIS

An NRC environmental assessment supporting maximum rod average burnup to as high as 62 GWD/MTU was published by the NRC in January 2001 (Reference 1). This document was prepared to support environmental assessments of operating plants where maximum average rod burnup exceeds 60 GWD/MTU. The environmental assessment concludes that there are no significant adverse environmental impacts related to increasing maximum rod average burnup to as high as 62 GWD/MTU. Thus, an environmental assessment supporting an increased maximum rod average burnup limit has been completed, and KPS OL condition 2.C (5) has been satisfied.

Kewaunee Power Station OL condition 2.C (5) currently limits maximum rod average burnup to 60 GWD/MTU. Deletion of this OL condition would allow for more effective fuel management and minimize the resources needed to change rod average burnup limits in the future. The proposed amendment would allow DEK to begin designing reload core loading patterns such that the maximum rod average burnup stays within the limits defined in Reference 16.

With the current fuel product and NRC approved models and methods used for design of KPS reload cores, deleting OL condition 2.C (5) would effectively raise the KPS maximum rod average burnup limit from 60 to 62 GWD/MTU. This will not compromise the safe operation of KPS. Cycle-specific reload calculations that confirm all fuel design criteria will be met are performed and documented each cycle during normal Reload Safety Evaluations (RSE). Westinghouse and DEK maintain records resulting from this process in their respective cycle-specific files. All current fuel design, core design, and safety analysis limits will continue to be met.

Should any cycle-specific evaluation be unable to demonstrate that a design criterion will be satisfied or that the current safety analysis remains bounding, either an alternate reload pattern will be developed or cycle burnup will be limited to a value where all criteria remain satisfied.

The core inventory modeled in the Kewaunee Alternate Source Term analysis is based on the ORIGEN2 code with six regions to model three batches of fuel, where the batch average burnup for the third cycle of fuel is approximately 50 GWD/MTU. Normal variation of batch burnups will not impact the dose analysis since the doses are primarily due to short lived iodine and noble gas isotopes, and the core inventory of these isotopes is primarily a function of operating power rather than cumulative burnup. Extending lead rod average burnups to 62 GWD/MTU will not significantly change the end of cycle batch average burnup for the third cycle assemblies, and the dose analyses of record will remain applicable.

In summary, the proposed amendment is considered acceptable because:

1. The NRC has completed the prerequisite environmental assessment of the effects of extending maximum rod average burnup to up to 62 GWD/MTU (Reference 1).

2. The current fuel design utilized at KPS will support a maximum average rod burnup in excess of 62 GWD/MTU.
3. The maximum rod average burnup limit is currently controlled and will continue to be controlled in accordance with existing fuel design and evaluation processes that are reviewed and approved by the NRC. Cycle-specific reload calculations that confirm all fuel design criteria will be met are performed and documented each cycle during normal Reload Safety Evaluations (RSE). The RSE establishes a reload cycle design burnup limit that ensures the maximum fuel rod average burnup does not exceed the fuel rod burnup limit.
4. The vendor's fuel performance code, PAD 4.0, is applicable to KPS fuel design and has been approved to a maximum rod average burnup limit of 62 GWD/MTU (Reference 11).
5. The NRC staff has concluded that the burnup limits for WCAP 12610-P-A can be increased to a maximum of 62 GWD/MTU provided the evaluation of the fuel design performance is performed with PAD 4.0 (References 15 and 16).

5.0 REGULATORY SAFETY ANALYSIS

5.1. No Significant Hazards Consideration

The proposed amendment would delete KPS OL condition 2.C (5), which limits maximum rod average burnup to 60 GWD/MTU until completion of an NRC environmental assessment supporting an increased limit. The NRC completed that assessment in January 2001 (Reference 1). Furthermore, the maximum rod average burnup limit at KPS will continue to be controlled in accordance with fuel management methods and models that have been previously reviewed and approved by the NRC. The maximum rod average burnup allowed by these methods and models is currently 62 GWD/MTU.

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

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

Response: No.

Deletion of KPS OL condition 2.C (5) does not add, delete, or modify any KPS systems, structures, or components (SSCs). The proposed amendment would effectively allow future increases in the KPS maximum rod average burnup limit using currently existing fuel management methods and models that have been reviewed and approved by the NRC. Maximum average rod burnup limits will continue to be maintained within safe and acceptable limits using these fuel management methods and models.

Nuclear fuel is the only plant component potentially affected by increasing the maximum rod average burnup limit. Increasing the KPS maximum rod average burnup limit does not affect the thermal hydraulic response or the radiological consequences of any previously evaluated accident. The fuel rod design criteria will continue to be met at the maximum burnup limits allowed under the current fuel management and evaluation processes. An increase to the maximum rod average burnup limit will not increase the likelihood of a malfunction of nuclear fuel since the fuel currently used at KPS has been designed to support a maximum rod average burnup well in excess of 62 GWD/MTU.

Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed amendment would delete a KPS OL condition that limits maximum rod average burnup. The proposed amendment would effectively allow future increases in the KPS maximum rod average burnup limit using currently existing fuel management methods and models that have been reviewed and approved by the NRC. Nuclear fuel is the only component potentially affected by changes to the maximum rod average burnup limit. The proposed amendment does not change the design function of the nuclear fuel or create any credible new failure mechanisms or malfunctions for the nuclear fuel. Fuel rod design criteria will continue to be met at the maximum burnup limits allowed under the fuel management methods and models that have been previously reviewed and approved by the NRC.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No.

The proposed amendment deletes a KPS OL condition that limits maximum rod average burnup. The proposed amendment would effectively allow future increases in the KPS maximum rod average burnup limit using currently existing methods and models that have been reviewed and approved by the NRC. The proposed amendment does not result in altering or exceeding a design basis or safety limit for the plant. All current fuel design criteria will continue to be satisfied,

and the safety analysis of record, including evaluations of the radiological consequences of design basis accidents, will remain applicable.

Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, Dominion Energy Kewaunee, Inc. concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2. Applicable Regulatory Requirements/Criteria

The US Atomic Energy Commission (AEC) issued their Safety Evaluation (SE) of the Kewaunee Power Station (KPS) on July 24, 1972 with supplements dated December 18, 1972 and May 10, 1973. The SE, Section 3.1, "Conformance with AEC General Design Criteria," described the conclusions the AEC reached associated with the General Design Criteria in effect at the time. The AEC stated:

"The Kewaunee plant was designed and constructed to meet the intent of the AEC's General Design Criteria, as originally proposed in July 1967. Construction of the plant was about 50% complete and the Final Safety Analysis Report (Amendment No. 7) had been filed with the Commission before publication of the revised General Design Criteria in February 1971 and the present version of the criteria in July 1971. As a result, we did not require the applicant to reanalyze the plant or resubmit the FSAR. However, our technical review did assess the plant against the General Design Criteria now in effect and we are satisfied that the plant design generally conforms to the intent of these criteria."

In conclusion, based on the considerations discussed above:

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. The 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

Deletion of the KPS OL condition limiting maximum average rod burnup meets the eligibility criteria for categorical exclusion from an environmental assessment as set forth in 10 CFR 51.22(c)(9).

As discussed in the significant hazards evaluation, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated and does not involve a significant reduction in a margin of safety. Therefore, the requirements of 10 CFR 50.92 (c) are met, and a finding of "no significant hazards consideration" is justified.

The proposed amendment would not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In January 2001, NRC published NUREG/CR-6703, "Environmental Effects of Extending Fuel Burnup Above 60 GWD/MTU." This document was prepared to assess the economic and environmental impact of extending maximum rod average burnup at operating plants. NUREG/CR-6703 concludes that there are no significant adverse environmental impacts associated with increasing maximum rod average burnup up to 62 GWD/MTU. This is the same maximum rod average burnup limit allowed by the currently existing fuel management methods and models that have been approved by NRC.

The propose amendment would not result in a significant increase in individual or cumulative occupational radiation exposure. Elimination of the unit-specific maximum average rod burnup limit and operation of the fuel to a maximum rod average burnup in accordance with NRC approved fuel management methods and models will not change normal plant operating conditions. There will be no change in the manner in which fuel is physically handled, operated, or stored and no significant changes to the radiation levels during these evolutions. Individual and cumulative occupational exposures are therefore not expected to significantly change.

Therefore, the proposed amendment qualifies for categorical exclusion from a specific environmental review by the Commission, as described in 10 CFR 51.22(c)(9).

7.0 REFERENCES

1. NUREG/CR-6703, "Environmental Effects of Extending Fuel Burnup Above 60 GWD/MTU," dated January 2001.
2. Dominion Procedure, NF-AA-NAF-200, Revision 0, "Reload Management Process."
3. Letter from C.R. Steinhart (WPSC) to NRC Document Control Desk, "Proposed Amendment 152 to the Kewaunee Nuclear Power Plant Technical Specifications," dated April 15, 1998.
4. Letter from M. L. Marchi (WPSC) to NRC Document Control Desk, "KEW-19 Fuel and Cycle 23 Reload Design Changes," dated September 5, 1997.
5. Letter from M. L. Marchi (WPSC) to NRC Document Control Desk, "Proposed Amendment 152a to the Kewaunee Nuclear Power Plant Technical Specifications," dated September 28, 1998.

6. Letter from W. O. Long (NRC) to M. L. Marchi (WPSC), "Amendment No. 142 to Facility Operating License No. DPR-43 – Kewaunee Nuclear Power Plant (TAC No. MA1557)," dated December 2, 1998.
7. Letter from M. E. Warner (NMC) to NRC Document Control Desk, "License Amendment Request 187 to the Kewaunee Nuclear Power Plant Technical Specifications, Conforming Technical Specification Changes for Use of Westinghouse VANTAGE+ Fuel," dated July 26, 2002.
8. Letter from J. G. Lamb (NRC) to T. Coutu (NMC), "Kewaunee Nuclear Power Plant – Issuance of Amendment (TAC No. MB5718)," dated April 4, 2003 (ADAMS Accession No. ML030940276).
9. WCAP-12488-P-A, "Westinghouse Fuel Criteria Evaluation Process," dated October 1994.
10. WCAP-10851-P-A, "Improved Fuel Performance Models for Westinghouse Fuel Rod Design and Safety Evaluations," dated August 1988.
11. WCAP-15063-P-A, "Westinghouse Improved Performance Analysis and Design Model (PAD 4.0), Revision 1, with errata," dated July 2000.
12. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," dated April 1995.
13. Letter from M. L. Marchi (WPSC) to NRC Document Control Desk, "Proposed Amendment 152a to the Kewaunee Nuclear Power Plant Technical Specifications," dated November 24, 1998.
14. Letter from S. Richards (NRC) to H. A. Sepp (Westinghouse), "Safety Evaluation Related to Topical Report WCAP-15063, Revision 1, Westinghouse Improved Performance Analysis and Design Model (PAD 4.0) (TAC No. MA 2086)," dated April 24, 2000.
15. Letter from B. F. Maurer (Westinghouse) to NRC Document Control Desk, "Licensing Burnup Limits," dated April 19, 2006.
16. Letter from J. D. Peralta (NRC) to B. F. Maurer (Westinghouse), "Approval for Increase in Licensing Burnup Limit to 62,000 MWD/MTU (TAC No. MD 1486)," dated May 25, 2006 (ADAMS Accession No. ML061420458).

Attachment 2

**LICENSE AMENDMENT REQUEST - 223
DELETION OF LICENSE CONDITION 2.C (5), ROD BURNUP**

**PROPOSED CHANGE TO OPERATING LICENSE PAGE 3
MARKED-UP PAGE**

**KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.**

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR, Chapter 1: (1) Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70, (2) is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect, and (3) is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is authorized to operate the facility at steady-state reactor core power levels not in excess of 1772 megawatts (thermal).

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 189, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

(3) Fire Protection

The licensee shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the licensee's Fire Plan, and as referenced in the Updated Safety Analysis Report, and as approved in the Safety Evaluation Reports, dated November 25, 1977, and December 12, 1978 (and supplement dated February 13, 1981) subject to the following provision:

The licensee may make changes to the approved Fire Protection Program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(4) Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10CFR 73.21, is entitled: "Nuclear Management Company Kewaunee Nuclear Power Plant Physical Security Plan (Revision 0)" submitted by letter dated October 18, as supplemented by letter dated October 21, 2004, July 26, 2005, and May 15, 2006.

(5) ~~Fuel Burnup~~ DELETED

~~The maximum rod average burnup for any rod shall be limited to 60 GWD/MTU until completion of an NRC environmental assessment supporting an increased limit.~~

Attachment 3

**LICENSE AMENDMENT REQUEST - 223
DELETION OF LICENSE CONDITION 2.C (5), ROD BURNUP**

**PROPOSED CHANGE TO OPERATING LICENSE PAGE 3
RE-TYPED PAGE**

**KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.**

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR, Chapter 1: (1) Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70, (2) is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect, and (3) is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is authorized to operate the facility at steady-state reactor core power levels not in excess of 1772 megawatts (thermal).

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 189, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

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(5) DELETED