



August 22, 2007

ATTN: Document Control Desk
Director Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Serial No. 07-0521
NL&OS/TJS R4
Docket No. 72-64

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION GENERAL LICENSE ISFSI
REQUEST TO CREDIT PRIOR WELDING AND REOPENING DEMONSTRATIONS
DURING GENERAL LICENSE ISFSI DRY RUN

Pursuant to the requirements of the Certificate of Compliance (CoC) 72-1004, and in order to satisfy the requirements of a general license to operate an Independent Spent Fuel Storage Installation (ISFSI) under 10 CFR 72, Subpart K – General License for Storage of Spent Fuel at Power Reactor Sites, Kewaunee Power Station (KPS) must demonstrate various facets of the dry fuel storage process including Dry Shielded Canister (DSC) sealing/welding and DSC reopening. These preoperational testing and training exercises are normally demonstrated during the plant's scheduled dry run as required by CoC 72-1004, Technical Specification 1.1.6, requirements and conditions for the 32PT DSC. However, the specific exercise of sealing a DSC, using the automated welding process selected by Dominion for KPS, was previously demonstrated on a Model 32PT-S100 DSC mockup at Millstone Power Station (MPS). The MPS demonstration was performed by the same contract specialty welding company, PCI Energy Services, Inc. (PCI), using the same welding processes, and leak detection testing methods that are being contracted for use at KPS. In addition, PCI has repeatedly demonstrated proficiency in the 32PT-S100 canister welding process with the Dominion-approved procedure set at MPS during cask loading campaigns.

Likewise, KPS also intends to use procedures for the existing milling process used by PCI to reopen the DSC inner and outer lids. As documented in NRC Inspection Report 0720005/2004-001, this process and associated procedures have been successfully demonstrated to the NRC by PCI for Point Beach Nuclear Power Plant. Furthermore, demonstration of the milling process was not required of Dominion at MPS since the same equipment and processes that were previously reviewed by the NRC at Point Beach were to be employed to open a previously sealed DSC at MPS. This was documented by the NRC in the MPS initial dry run inspection report. KPS will use the same style Transnuclear 32PT DSCs as MPS and Point Beach. KPS will be implementing the procedures used at MPS for their 32PT DSCs' sealing and reopening processes under CoC 72-1004.

Based on previous successful demonstrations of the sealing and opening of similar DSCs which have been performed by PCI and observed by the NRC, Dominion requests that the requirement for specific demonstration of welding and reopening a DSC mockup for the KPS preoperational testing and training exercise be waived.

Please contact Mr. Thomas Szymanski at (804) 273-3065 if you have any questions or require additional information.

Sincerely,



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Attachments: None

Commitments made in this letter: None

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