



July 6, 2009

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Serial No.: 09-408
LR/DEA R0
Docket No.: 50-305
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
RESPONSE TO REQUEST TO DOCKET INFORMATION RELATED TO THE
ENVIRONMENTAL SITE AUDIT FOR KEWAUNEE POWER STATION

By letter dated April 11, 2009 (Reference 1), the NRC provided Dominion Energy Kewaunee (DEK) a list of information and documentation that NRC auditors needed in order to conduct an environmental site audit associated with the Kewaunee Power Station (KPS) license renewal application. The requested information and documentation was made available to the NRC inspectors during the environmental site audit, conducted during the period from May 26-29, 2009.

Following completion of the environmental site audit, the NRC informally requested that DEK docket by letter some of the information requested in the April 11 letter and made available during the audit. The purpose of this letter is to fulfill the NRC staff request that this information be publicly docketed. This letter contains that portion of the requested information that does not contain confidential information. Additional requested information that DEK believes should be withheld from public disclosure in accordance with 10 CFR 2.390 will be submitted under separate cover.

Attachment 1 to this letter contains a list of information that the NRC requested DEK formally docket. Attachment 2 provides the requested information. Enclosures A through F to this letter provide various documents and information on the list.

ADD
NRC

Should you have any questions regarding this submittal, please contact Mr. Paul C. Aitken at (804) 273-2818.

Very truly yours,



Leslie N. Hartz
Vice President – Nuclear Support Services

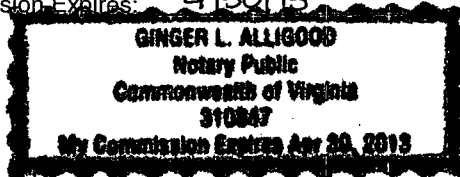
COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and State aforesaid, today by Leslie N. Hartz, who is Vice President – Nuclear Support Services of Dominion Energy Kewaunee, Inc. She has affirmed before me that she 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 her knowledge and belief.

Acknowledged before me this 6th day of July, 2009.

My Commission Expires: 4/30/13


Notary Public



Reference:

1. Letter from Sarah Lopas (NRC) to David A. Christian (DEK), "Environmental Site Audit Regarding Kewaunee Power Station License Renewal Application (TAC No. MD9409)," dated April 11, 2009. [ADAMS Accession No. ML090750720]

Attachments:

1. Site Audit References Requested for Docketing by NRC
2. Additional Information in Support of the Application for License Renewal for Kewaunee Power Station

Enclosures:

- A. Meteorology and Air Compliance
- B. Terrestrial Ecology
- C. Aquatic Ecology
- D. Hydrology
- E. Non-Radiological Waste
- F. Archaeological and Cultural Resources

Commitments made in this letter: None.

cc: w/o Enclosures

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ATTACHMENT 1

SITE AUDIT REFERENCES REQUESTED FOR DOCKETING BY NRC

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

**Kewaunee Power Station
License Renewal Environmental Site Audit
May 26-28, 2009**

SITE AUDIT REFERENCES REQUESTED BY NRC FOR DOCKETING

Meteorology and Air Compliance

1. NMC KNPP System Description: Meteorological Data Acquisition System (MET)
Date: 1/27/03 Sys No. 63, Rev. 1.
2. Procedure No. RP-KW-001-025, Revision No. 0. Meteorological Monitoring
(internal phone number removed).
3. Air Pollution Control Operation Permit Renewal, Permit No. 431022790-F20.

Terrestrial Ecology

1. Documentation/correspondence related to diving ducks in the intake between
Dominion and DNR 7/28/08 letter (requested during terrestrial interview).
2. Documentation of size of wetland near ISFSI that has been delineated in 5/27/09
e-mail (requested during terrestrial interview).
3. Terrestrial survey of Kewaunee site, 2006-2007 (redacted version).
4. ATC transmission line right-of-way vegetation management specification, August
2008.
5. Responses given in site audit needs list handout for terrestrial questions
 - a. Question #1 (invasive species)
 - b. Question #2 (herbicides)
 - c. Question #6 (land use breakdown by percentage)

Aquatic Ecology

1. 1974 Pre-Operation Monitoring Report to Wisconsin Public Services Group, Third
Annual Report, 3/29/74 (Note: 1st volume only).
2. 1977 Operational Monitoring Report, Sixth Annual Report, March 1, 1977 Note: 1st
volume only).

**Kewaunee Power Station
License Renewal Environmental Site Audit
May 26-28, 2009**

SITE AUDIT REFERENCES REQUESTED BY NRC FOR DOCKETING (Cont'd.)

Hydrology

1. 1985 Water Pump Flow Test numbers.
2. Radiological Environmental Monitoring Manual (REMM) – with maps of wells.
3. STS Well Installation (hydrology models).
4. Storm Water Prevention Plan.
5. Discharge Monitoring Report (March 2009)
6. KNPP System Description – Circulating Water System Sys No. 04, Rev. 5, 03/20/08.
7. KNPP System Description – Service Water System Sys No. 02, Rev. 4, 10/04/07.
8. Excel spreadsheet, Kewaunee Power Station Potable Water Usage Documentation.
9. Dominion Memorandum, 01/11/08, T. Hooker to R. Gallagher, Groundwater Usage at KPS.
10. Wisconsin DNR website, DNR Drinking Water System: High Capacity Wells (Information on KPS wells).

Non-Radiological Waste

1. Dominion Energy Kewaunee, Inc. Kewaunee Power Station Hazardous Waste Plan.
2. Responses given in site audit needs list handout for non-radiological waste questions.
 - a. Question #4 (hazardous waste generated during refurbishment)
 - b. Question #5 (recycling program at KPS)
 - c. Question #6 (mixed waste)
3. Dominion Environmental Policy Statement.
4. Kewaunee Power Station Nonradioactive Wastes Updated Table 3.1-1.
5. Kewaunee Power Station – Waste Overview.
6. KNPP System Description – Sewage Treatment Plant (SDP) Sys No. 85, Rev. 1 03/17/03 (Note: only pages 1-6 are needed).

**Kewaunee Power Station
License Renewal Environmental Site Audit
May 26-28, 2009**

SITE AUDIT REFERENCES REQUESTED BY NRC FOR DOCKETING (Cont'd.)

Environmental Justice

1. Responses given in site audit needs list handout for Environmental Justice .
 - a. Question #1 (environmental justice).

Socioeconomics

1. Responses given in site audit needs list handout for Socioeconomics.
 - a. Question #1 (utility aid payments – KPS Community Aid Investments).
 - b. Question #2 (update on changes to utility aid payments).

Archaeological and Cultural Resources

1. Responses given in site audit needs list handout for Archaeological and Cultural Resources.
 - a. Question #1 (surveys).
 - b. Question #3 (contacting SHPO).
 - c. Question #4 (stop work).
 - d. Question #5 (land disturbance).
 - e. Question #6 (Section 106 training).
 - f. Question #7 (measures to protect cultural resources along t-lines – Jenny would like a more detailed response, e.g. “ATC has identified areas of cultural or archaeological significance and has procedures in place to protect cultural resources...”).
 - g. Question #12 (SHPO comment).
2. Dominion Procedure SA-AA-106, Cutting, Digging and Drilling, Rev. 2.
3. Articles regarding Chief Kah-Que-Dos.
4. Letter to S. Banker, Wisconsin SHPO, from P. Faggert, “License Renewal Application for Kewaunee Power Station Request for Information on Historical/Archaeological Resources”, dated 10/31/07.
5. Request for SHPO Comment and Consultation on a Federal Undertaking.
6. Cheese Factories in the Town of Carlton, September 2004 compiled by Donna Urban.

**Kewaunee Power Station
License Renewal Environmental Site Audit
May 26-28, 2009**

SITE AUDIT REFERENCES REQUESTED BY NRC FOR DOCKETING (Cont'd.)

7. Background for Historical Markers – Kewaunee County Historical Society.
 8. Sandy Bay Lutheran Church (St. John Evangelical Lutheran Church) and School articles.
 9. Kewaunee School Forest brochure and Shoreline Newslite, "Forest Dedicated...".
 10. Maps (just those placed aside).
 11. Photos (just those placed aside).
 12. ATC Transmission Network and Substation – Maps Showing Locations of Nearby Historic/Archaeological Sites. *
- * These documents will be submitted under separate cover in accordance with 10 CFR 2.390(a)(3) and withheld from public disclosure.

ATTACHMENT 2

**ADDITIONAL INFORMATION IN SUPPORT OF THE APPLICATION FOR
LICENSE RENEWAL FOR KEWAUNEE POWER STATION**

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

Provided below are responses to selected questions chosen by the NRC to be docketed.

TERRESTRIAL ECOLOGY (See Attachment 1, *Terrestrial Ecology, Item 5*)

- 1. (Question #1) Have any invasive species been seen or documented on the site? Are any invasive species populations being managed, or have any been managed in the past?**

DEK Response: The following table lists the species on site that are listed by the Wisconsin Department of Natural Resources as invasive. The terrestrial species were identified during the 2006-2007 Terrestrial Ecology Site Survey. None of these terrestrial species are being managed, and to DEK's knowledge, they have not been managed in the past. The fish species were identified during the 316(b) study, and the Zebra Mussel has been known to be a nuisance for several years. The Zebra Mussel is the only aquatic species that is managed (within the plant, through periodic chlorination).

Invasive Species Observed on KPS Site

Terrestrial

Bird's-foot trefoil	<i>Lotus corniculata</i>
Bull thistle	<i>Cirsium vulgare</i>
Butter & Eggs	<i>Linarea vulgaris</i>
Canada thistle	<i>Cirsium arvense</i>
Common burdock	<i>Arctium minus</i>
Common mullein	<i>Verbascum thapsus</i>
Crown vetch	<i>Coronilla varia</i>
Dame's rocket	<i>Hesperis matronalis</i>
Eastern cottonwood (N)	<i>Populus deltoides</i>
Horsetail (N)	<i>Equisetum sp.</i>
Orange daylily	<i>Hemerocallis fulva</i>
Orange hawkweed	<i>Hieracium aurantiacum</i>
Ox-eye daisy	<i>Leucanthemum vulgare</i>
Phragmites / Common reed	<i>Phragmites australis</i>
Quaking aspen (N)	<i>Populus tremuloides</i>
Queen Anne's-lace	<i>Daucus carota</i>
Red clover	<i>Trifolium pratense</i>
Red osier dogwood (N)	<i>Cornus serices</i>
Russian olive	<i>Elaeagnus angustifolia</i>
Spotted knapweed	<i>Centurea biebersteinii, c. stoebe</i>
Virginia waterleaf (N)	<i>Hydrophyllum virginianum</i>
White sweet-clover	<i>Melilotus alba</i>
Willows (N)	<i>Salix spp.</i>
Yellow sweet-clover	<i>Melilotus officinalis</i>

Aquatic

Common carp	<i>Cyprinus carpio</i>
Rainbow smelt	<i>Osmerus mordax</i>
Round goby	<i>Neogobius melanostomus</i>
Zebra mussel	<i>Dreissena polymorpha</i>

Note:

N = Aggressive Native Species

2. (Question #2) What pesticides and/or herbicides are used on site or within the in-scope transmission line right-of-ways (ROWs)? What protocol do the contractors follow when applying chemicals near streams and wetlands?

DEK Response: On the site, the following herbicides/pesticides are used:

- Diuron 80 DF
- Krovar I DF
- Prozap Aqueous Fly Spray (used in Sewage Treatment Plant)

ROW management is performed on behalf of the American Transmission Company (ATC), the owner of the transmission lines. The following herbicides are used:

- Escort XP
- Arborchem Clean Cut (a diluent)
- Arborchem Basal Oil (a diluent)
- 41-A
- Arsenal Powerline
- Tordon K
- Garlon 4

3. (Question #6) Please provide percentages of terrestrial communities on site (e.g., 20 percent of the site is forest habitat), if available.

DEK Response: The KPS site consists of a number of different land use types. Approximately half of the site is leased to area farmers for use as agricultural land. Much of the rest of the site consists of land in various stages of succession. The land was divided into the following categories. Percentages are rounded to the nearest whole number:

Cultivated (Agricultural)	53%
Open Field/Early Succession	16%
Mid/Late Succession Forest/Riparian	18%
Shoreline	1%
Plant Site	7%
Mowed Fields	3%

NON-RADIOLOGICAL WASTE (See Attachment 1, Non-Radiological Waste, Item 2)

1. ***(Question #4) Please identify the types and approximate quantities of hazardous waste typically generated during refueling outages. Are these wastes disposed of according to standard plant procedures?***

DEK Response: Typically, the only additional hazardous waste stream produced during an outage would be approximately 20 gallons of waste isopropyl alcohol, from the cleaning of turbine parts during maintenance. This waste is disposed of in accordance with the Kewaunee Power Station Hazardous Waste Plan, provided in Enclosure E of this letter.

2. ***(Question #5) Please describe the recycling program currently in place at KPS.***

DEK Response: The recycling process is used for a variety of waste from the plant. The following is a list of wastes that are recycled:

- Paper/Cardboard
- Comingled Recyclables (glass/plastic/metals)
- Fluorescent tubes
- Incandescent bulbs
- Electronic equipment
- Batteries
- Scrap metal
- Lead Acid Batteries
- Used Oil
- Antifreeze

3. ***(Question #6) Please provide the amounts (by weight) of mixed wastes at the KPS site generated over the past five years.***

DEK Response: Provided below is a list of mixed wastes at the KPS site generated over the past five years.

KPS Pounds of Mixed Waste

	2004	2005	2006	2007	2008
Mixed Waste					
LLMW Agitene (Aug-2006)			23		
LLMW Caustic (Aug-2007)				25	
LLMW Caustic (July-2008)					13
LLMW Caustic (Aug-2008)					1

The only two mixed wastes currently on site are the 2007/2008 caustic and a 2003 paint remover.

The Agitene was disposed of in the used oil stream and placed in the slightly contaminated used oil drum on 8/20/08. The drum was later sent to the heating boiler fuel oil tank, along with all of the other slightly contaminated used oil, as approved by the WDNR air permit.

ENVIRONMENTAL JUSTICE (See Attachment 1, Environmental Justice, Item 1)

- 1. (Question #1) To help address the provisions of Section 4-4 "Subsistence Consumption of Fish and Wildlife" in Executive Order 12898, the NRC needs information about current or past wildlife sampling and testing of game animals such as deer, squirrel, turkey, pheasant, duck, and other game birds and animals that may have been conducted in the vicinity of the KPS by the state and/or the owner/operators of the plant. Wildlife sampling and testing may have been conducted at KPS by Wisconsin Public Service Corp. and Wisconsin Power and Light Co., and/or the state before, during, and after plant construction, and in the early days of plant operation.**

DEK Response: DEK contacted WPSC to inquire about such studies. Neither DEK nor WPSC is aware of such studies.

SOCIOECONOMICS (See Attachment 1, Socioeconomics, Item 1)

1. (Question #1) In addition to the utility aid payment information presented in Section 2.7 of the ER, please describe any other annual support payments, one-time payments, and other forms of compensation (if any) provided to local organizations, communities, and jurisdictions (e.g., county, municipality, townships, villages, incorporated places, and school districts) on behalf of KPS.

DEK Response: The following table includes payment information in addition to the payment information presented in License Renewal Application (LRA) Appendix E, Section 2.7.

KPS Community Investments 2005-present							
		2009	2008	2007	2006	2005	Total
Agricultural Heritage & Resources				\$7,500	\$5,000		
Algoma Education Assn. Golf			\$125	\$125			
Algoma Long Term Care Unit			\$2,500				
Algoma Main Street Walldog Wave				\$5,000			
ArtBeet, Inc.			\$300	\$2,500			
Autism Society of the Lakeshore			\$400	\$250			
Badger State Science & Engineering Fair		\$5,000	\$5,000				
Bay Beach Wildlife Sanctuary			\$2,000				
Benefits			\$105				
Big Brothers/Big Sisters Bowl-a-Thon		\$300	\$300				

KPS Community Investments 2005-present							
		2009	2008	2007	2006	2005	Total
Blood Center of Wisconsin					\$500		
Capitol Civic Centre			\$1,500				
Casco American Legion Memorial			\$1,500				
Chamber of Manitowoc Co. Foundation		\$3,000					
Champions of Conservation Awards		\$40,000	\$40,000				
Court Appointed Special Advocates (CASA)				\$2,500	\$200		
Crime Stoppers of Kewaunee Co.		\$1,000					
Denmark Wrestling Club Tournament			\$500				
Door County 4-H Center					\$1,000		
Door County Kewaunee Bus Ed Partnership		\$2,500	\$2,500		\$7,500		
East Shore Industries Golf Tournament		\$2,500	\$2,500				
Edison Middle School Music Dept.						\$200	
Einstein Project		\$5,000		\$9,000	\$5,000		
Farm Market Kitchen/Living Lakes		\$500	\$7,500	\$10,000	\$10,000		

KPS Community Investments 2005-present							
		2009	2008	2007	2006	2005	Total
Farm Technology Days			\$2,000				
Foundation of Independent Colleges			\$7,500		\$7,200		
Freedom House					\$7,200		
Friends of the Ahnapee State Trail						\$7,500	
Green Bay Chamber Golf			\$700	\$200	\$200		
Green Bay Chamber Packers Luncheon			\$360	\$342			
Green Bay Preble High School Music Dept.			\$100				
Green Bay Schools Minority Student Achievement					\$500		
Gold Star Families				\$200			
Green Bay Preble Basketball Boosters						\$100	
Green Bay Symphony Youth Orch					\$3,500		
Green Bay YMCA Partner with Youth		\$250	\$250				
Groundwater Festival			\$250	\$100	\$1,500		

KPS Community Investments 2005-present							
		2009	2008	2007	2006	2005	Total
	Hamilton Community House Renovation				\$5,000		
	Herald Times Newspapers in Schools				\$1,000		
	Hooked on a Hobby		\$693	\$530	\$250		
	Horizons Wheelchair Basketball			\$100			
	Junior Leadership Program						
	KAN Cool for School		\$200		\$200		
	Kew. Co EDC Annual Dinner				\$500		
	Kewaunee Co. Human Services Back to School		\$200		\$200		
	Kewaunee Area Scholarships			\$250		\$250	
	Kewaunee Chamber Dinner			\$80			
	Kewaunee County Ducks Unlimited		\$500				
	Kewaunee County Fair		\$2,000	\$395			
	Kewaunee County Board Meetings		\$300				
	Kewaunee County Historical Society		\$3,500				

KPS Community Investments 2005-present							
		2009	2008	2007	2006	2005	Total
	Kewaunee Fire Department				\$110		
	Kewaunee High Every-15-Minutes	\$300					
	Kewaunee High Post Prom	\$500	\$500	\$500	\$500		
	Kewaunee High Spanish Class Trip		\$250		\$200		
	Kewaunee Optimist Club Basketball		\$150	\$100	\$100	\$100	
	Kewaunee PR Committee Sign			\$500			
	Kewaunee Rotary Youth Leadership			\$225			
	Kewaunee Schools Emergency Kits			\$941			
	Kewaunee Skate Park					\$5,000	
	Kewaunee Trout Festival		\$1,500	\$1,000	\$500		
	Kewaunee Young People's Theater			\$250	\$150		
	Lakeshore Community Action Pantry		\$2,000			\$500	
	Lakeshore Tech HP/Rad program				\$20,000		
	LC High Variety Show		\$100	\$100			
	Leukemia & Lymphoma Society				\$250		

KPS Community Investments 2005-present							
		2009	2008	2007	2006	2005	Total
Literacy Partners of Kewaunee County			\$2,000	\$5,000	\$5,000		
Luxemburg Blue Jays Baseball			\$90	\$100			
Luxemburg Casco Girls Basketball Boosters			\$100				
Luxemburg Centennial			\$750				
Manitowoc Chamber Annual Dinner					\$200		
Manitowoc Chamber Energy Summit				\$2,500			
Manitowoc Chamber Golf			\$650	\$150			
Manitowoc Chamber Junior Leadership			\$4,000	\$3,500	\$3,500		
Manitowoc County United Way		\$50	\$2,000	\$2,000	\$2,000	\$2,000	
Manitowoc Courthouse Dome Restoration			\$15,000				
Manitowoc Lincoln Football Boosters			\$500				
Manitowoc Symphony			\$1,000				
Manitowoc Two Rivers YMCA New Year's			\$3,500	\$3,000			

KPS Community Investments 2005-present							
		2009	2008	2007	2006	2005	Total
Manitowoc YMCA Gymnastics						\$1,400	
Manitowoc YMCA Strong Kids			\$1,000				
March of Dimes Walk America				\$500			
McAuliffe Park				\$25			
Miracle League Playground			\$12,500				
Mishicot Basketball Tournament		\$750	\$750	\$70			
Mishicot Sports Boosters Golf			\$100				
National Child Safety Council			\$288	\$288	\$288		
N.E. Wisconsin Business Plan Contest		\$3,000	\$3,000	\$3,000			
NEED Teachers Workshop			\$754				
NWTC Health Screenings			\$201				
Paul's Pantry			\$10,000				
Peninsula Players Theater						\$250	
Peter's Food Pantry			\$4,000				
Plant-it 2020					\$250		
Red Cross Tornado Relief						\$5,000	
Relay for Life DePere (Cancer Society)				\$300			

KPS Community Investments 2005-present							
		2009	2008	2007	2006	2005	Total
Relay for Life Kewaunee (Cancer Society)				\$500			
Rogers Street Historic Fishing Village			\$10,000	\$4,000			
Roosevelt Institute Energy Conference				\$5,000			
Salvation Army Camp Hope			\$300	\$5,000			
Salvation Army Food Pantry			\$2,000				
Spartan Youth Baseball Tournament			\$200	\$150			
Spurs 'n Purrs Kids Day Out		\$300			\$250		
Swan House (single parents)					\$250		
The Kewaunee Sunshine Pre-School					\$2,500		
Thunder on the Lakeshore Airshow			\$500				
Tisch Mills Festival			\$250	\$250	\$250	\$250	
Two Rivers Alumni Assn. Golf			\$200				
Two Rivers Ethnic Fest			\$5,000	\$5,000	\$2,500		
Two Rivers Main Street Program						\$6,000	
Two Rivers Mishicot Ecumenical Pantry			\$2,000			\$525	

KPS Community Investments 2005-present							
		2009	2008	2007	2006	2005	Total
Memberships							
	EDC of Manitowoc Co.	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000	
	Friends of the Ahnapee Trail			\$150	\$150		
	Green Bay Chamber of Commerce		\$4,496	\$4,369		\$3,931	
	Kewaunee Chamber of Commerce		\$750	\$1,789		\$500	
	Kewaunee Co. Economic Development	\$5,000	\$5,000	\$5,000			
	The Chamber of Manitowoc County		\$2,612	\$2,391			
	Wisconsin Utility Assoc.	\$10,000					
	Wisconsin Manufacturers & Commerce		\$3,304	\$3,025		\$3,025	
	Wisconsin Public Utilities Institute	\$3,500	\$3,500	\$3,500			
	TOTALS	\$23,500	\$24,662	\$25,224	\$5,150	\$12,456	
							\$90,992
Governmental							
	Town of Carlton Generator		\$31,522				
	City of Kewaunee Ready to Serve	\$17,000	\$17,000	\$17,000			
	Town of Carlton Ready to Serve	\$21,500	\$21,500	\$21,500			
	TOTALS	\$38,500	\$70,022	\$38,500	\$0	\$0	
							\$147,022
<i>Does not include merchandise and other small donations to local charity events, silent auctions, etc.</i>							

2. (Question #2) Please provide an update on changes to the utility aid payments including changes in assessed property value or any other anticipated payment adjustments that could result in notable increases or decreases in payments.

DEK Response: The following tables contain updated numbers for Tables 2.7-1 through 2.7-5 from the Environmental Report. Please note that numbers that are **italicized and bolded** are new, updated, or revised. All information was provided by the Wisconsin Department of Revenue.

Table 2.7-1. Wisconsin Shared Revenue Utility Payments to the Town of Carlton for Utility Property in the Town of Carlton, 2004 to 2008*

Item	2004	2005	2006	2007	2008
Utility Property: Net Book Value:					
Wisconsin Power & Light	48,276,451	44,689,234	6	6	6
Wisconsin Public Service	70,717,380	73,240,209	0	240,250	154,309
Dominion Energy Kewaunee	0	0	75,773,083	36,556,659	37,503,448
<u>American Transmission</u>	<u>1,310,499</u>	<u>1,281,173</u>	<u>1,872,469</u>	<u>2,209,085</u>	<u>2,043,656</u>
Total	120,304,330	119,210,616	77,643,558	39,006,000	39,701,413
<u>Value Guarantee</u>	<u>1,093,714</u>	<u>0</u>	<u>17,062,594</u>	<u>55,702,152</u>	<u>55,006,739</u>
Total Value	121,398,044	119,210,616	94,708,152	94,708,152	94,708,152
Payment:					
Payment Rate	0.003	0.003	0.003	0.003	0.003
<u>Payment – Rate X Total Value</u>	<u>364,194.13</u>	<u>357,631.85</u>	<u>284,124.46</u>	<u>284,124.46</u>	<u>284,124.46</u>
Population	1,032	1,037	1,031	1,034	1,061
Payment Limit – Per Capita	300.00	300.00	300.00	300.00	300.00
<u>Maximum Payment</u>	<u>309,600.00</u>	<u>311,100.00</u>	<u>309,300.00</u>	<u>310,200.00</u>	<u>318,300.00</u>
Value-Based Payment	309,600.00	311,100.00	284,124.46	284,124.46	284,124.46
<u>Spent Nuclear Fuel Payment</u>	<u>50,000.00</u>	<u>50,000.00</u>	<u>50,000.00</u>	<u>50,000.00</u>	<u>50,000.00</u>
Total Utility Payment	359,600.00	361,100.00	334,124.46	334,124.46	334,124.46

* All information is from Wisconsin Department of Revenue

Table 2.7-2. Wisconsin Shared Revenue Utility Payments to Kewaunee County for Utility Property in the Town of Carlton, 2004 to 2008*

Item	2004	2005	2006	2007	2008
Utility Property: Net Book Value:					
Wisconsin Power & Light	48,276,451	44,689,234	6	6	6
Wisconsin Public Service	70,717,380	73,240,209	0	240,250	154,309
Dominion Energy Kewaunee	0	0	75,773,083	36,556,659	37,503,448
<u>American Transmission</u>	<u>1,310,499</u>	<u>1,281,173</u>	<u>1,872,469</u>	<u>2,209,085</u>	<u>2,043,656</u>
Total	120,304,330	119,210,616	77,643,558	39,006,000	39,701,413
<u>Value Guarantee</u>	<u>1,093,714</u>	<u>0</u>	<u>17,062,594</u>	<u>55,702,152</u>	<u>55,006,739</u>
Total Value	121,398,044	119,210,616	94,708,152	94,708,152	94,708,152
Payment:					
Payment Rate	0.006	0.006	0.006	0.006	0.006
<u>Payment – Rate X</u>	<u>728,388.26</u>	<u>715,263.70</u>	<u>568,248.91</u>	<u>568,248.91</u>	<u>568,248.91</u>
<u>Total Value</u>					
Population	20,648	21,082	21,157	21,198	21,358
Payment Limit – Per Capita	100.00	100.00	100.00	100.00	100.00
<u>Maximum Payment</u>	<u>2,064,800</u>	<u>2,108,200</u>	<u>2,115,700</u>	<u>2,119,800</u>	<u>2,135,800</u>
Value-Based Payment	728,388.26	715,263.70	568,248.91	568,248.91	568,248.91
<u>Spent Nuclear Fuel Payment</u>	<u>50,000.00</u>	<u>50,000.00</u>	<u>50,000.00</u>	<u>50,000.00</u>	<u>50,000.00</u>
Total Utility Payment	778,388.26	765,263.70	618,248.91	618,248.91	618,248.91
Total Utility Payment					

* All information is from Wisconsin Department of Revenue

**Table 2.7-3 WSR Utility Payments
2009 Estimate**

	<u>Carlton</u>	<u>Kewaunee</u>	<u>Total</u>
Utility Property: Net Book Value:			
Wisconsin Public Service	148,137.00	148,137.00	148,137.00
American Transmission	1,961,910.00	1,961,910.0	1,961,910.0
Total	2,110,047.00	2,110,047.0	2,110,047.0
<u>Payment Rate</u>	<u>0.003</u>	<u>0.006</u>	
Value Based Payment	6,330.14	12,660.28	18,990.42
Megawatt - Based Payment:			
\$ per MW of Capacity	666.67	1,333.33	2,000.00
<u>MW Capacity</u>	<u>535.00</u>	<u>535.00</u>	<u>535.00</u>
MW – Based Payment	356,666.67	713,333.32	1,070,000.00
Maximum Payment:			
Population	1,061	21,494	
Payment Limit - Per Capita	425.00	125.00	
Maximum Payment	450,925.00	2,686,750.00	3,137,675.00
Utility Property -- Value Based Payment	6,330.14	12,660.28	18,990.42
Utility Property -- Megawatt Based Payment	356,666.67	713,333.32	1,070,000.00
Spent Nuclear Fuel Payment	50,000.00	50,000.00	100,000.00
Total Utility Aid Payment	412,996.81	775,993.60	1,188,990.42

Source: WDOR

Note: The shared revenue payment is funded from general state revenues; it is not paid by the utilities in the town. It is a payment for the presence of the utilities in the town and county.

**Table 2.7-4. Town of Carlton-- Wisconsin Shared Revenue Utility Payments
and Total Town Revenues, 2004 to 2008**

Year	2004	2005	2006	2007	2008
Total Revenues (\$)	522,200	522,100	515,200	576,400	NA
WSRP Utility Payment (\$)	359,600	361,100	334,124	334,124	334,124
Percent of Total Revenues	68.9	69.2	64.8	57.9	NA

Source WDOR
NA= Not available

**Table 2.7-5. Kewaunee County-- Wisconsin Shared Revenue Utility Payments
and Total County Revenues, 2004 to 2008**

Year	2004	2005	2006	2007	2008
Total Revenues (\$)	20,376,900	22,597,300	21,683,600	26,351,500	NA
WSRP Utility Payment (\$)	778,388	765,264	618,249	618,249	618,249
Percent of Total Revenues	3.8	3.4	2.8	2.3	NA

Source WDOR
NA= Not available

ARCHAEOLOGICAL AND CULTURAL RESOURCES (See Attachment 1, *Archaeological and Cultural Resources, Item 1*)

1. ***(Question #1) Were any surveys (archaeological investigations) completed prior to construction of KPS? If so, the NRC would like to see those reports.***

DEK Response: DEK has not been able to locate, and is not aware of, any such surveys.

2. ***(Question #3) Has the Wisconsin State Historic Preservation Office (SHPO) reviewed onsite procedures regarding historic and archaeological resources? Would the SHPO be contacted in the case of an inadvertent discovery? Would a cultural resource professional be called in to evaluate inadvertent discoveries?***

DEK Response: The Wisconsin SHPO has not reviewed Administrative Procedure SA-AA-106, "Drilling, Digging, and Cutting". In the event of a discovery of a cultural resource, the SHPO would be contacted. If recommended by the SHPO, a cultural resource professional would be called in to evaluate a discovery.

3. ***(Question #4) Do procedures have a stop work order?***

DEK Response: Administrative Procedure SA-AA-106 has a stop work order.

4. ***(Question #5) Please provide a land disturbance map that identifies areas of heavy, moderate, low, and undisturbed areas of plant property.***

DEK Response: Figure 5 of the site's Phase I Archaeological Survey delineates areas that were considered too disturbed to warrant inclusion in the survey. The overwhelming majority of the rest of the site was heavily farmed prior to plant construction. Historic photos, enclosed, provide insight into the level of disturbance.

5. ***(Question #6) What training does the Environmental Coordinator have in relation to Section 106 guidelines?***

DEK Response: The Environmental Coordinator has read Section 106 of the National Historic Preservation Act; 36 CFR 800; and background information on Section 106 and National Register evaluation criteria.

6. (Question #7) Do maintenance procedures for transmission line corridors take into account the protection of cultural resources?

DEK Response: The transmission lines are owned and maintained by American Transmission Company (ATC). ATC has identified areas of cultural or archaeological significance that are taken into consideration when engaging in activities that could cause a direct impact. Enclosure B provides a copy of the ATC vegetation maintenance procedure. Maintenance of the transmission line corridors does not include ground-disturbing activities. However, ATC maintains a "No Rut" rule for vegetation maintenance, which ensures the protection of cultural resources during such activities.

In the October 10, 2008 letter from the NRC to the Wisconsin Historical Society, ADAMS Accession # ML082670685, the NRC stated the following:

"...the area of potential effect (APE) for a license renewal action is the area at the power plant site and its immediate environs that may be impacted by post-license renewal land-disturbing activities or projected refurbishment activities associated with the proposed action. The APE may extend beyond the immediate environs in those instances where post-license renewal land-disturbing operations or projected refurbishment activities specifically related to license renewal may potentially have an effect on known or proposed historic sites."

The transmission lines connected to the Kewaunee Power Station (KPS) switchyard are an integral part of the transmission grid, and will remain so irrespective of KPS license renewal. Therefore, there are no activities in the transmission line corridors that are specifically related to license renewal.

7. (Question #12) Did the Wisconsin SHPO comment on the Phase 1 report drafted by Archaeological Services, Inc. for KPS?

DEK Response: The Wisconsin SHPO has not commented on the Phase 1 Report.