



July 27, 2009

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Serial No. 09-294A
LIC/JF/R0
Docket No.: 50-305
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FOR INSERVICE
INSPECTION PROGRAM FOURTH TEN-YEAR INTERVAL PROPOSED
ALTERNATIVE NO. RR-1-11

On May 28, 2009, Dominion Energy Kewaunee, Inc. (DEK) requested approval of an alternative to the requirement of footnote 1 to 10 CFR 50.55a(g)(6)(ii)(E), which would require the performance of a "Visual, VE" bare-metal visual examination of the Reactor Pressure Vessel (RPV) bottom mounted instrumentation (BMI) penetrations per Code Case N-722 during the next refueling outage after January 1, 2009 (reference 1). The requested alternative would permit the visual examinations performed on the Kewaunee Power Station (KPS) BMI penetrations during the 2008 refueling outage to be used as the initial reactor coolant pressure boundary visual inspection, in place of the footnote 1 requirement that the initial inspection be performed during the next refueling outage after January 1, 2009. The next "Visual, VE" BMI examinations would then be performed at the required examination frequency (every other refueling outage) beginning with the 2011 KPS refueling outage.

Subsequently, on July 2, 2009, the Nuclear Regulatory Commission (NRC) transmitted to DEK an email request for additional information (RAI) (reference 2) concerning the proposed alternative. Attachment 1 to this letter contains DEKs response to the RAI.

If you have questions or require additional information, please contact Mr. Jack Gadzala at 920-388-8604.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Alan Price".

J. Alan Price
Vice President – Nuclear Engineering

Attachment:

Response to Request for Additional Information Concerning Proposed Alternative RR-1-11.

Commitments made by this letter: None

References:

1. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "Inservice Inspection Program Fourth Ten-Year Interval, Proposed Alternative No. RR-1-11," dated May 28, 2009. [ADAMS Accession No. ML091520538]
2. Email from Peter Tam (NRC) to Jack Gadzala, Thomas Breene and Craig Sly (DEK), "Kewaunee - Draft RAI on proposed Alternative No. RR-1-11 (TAC ME1394)," dated July 2, 2009. [ADAMS Accession No. ML091831351]

cc: Regional Administrator, Region III
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ATTACHMENT 1

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION CONCERNING
PROPOSED ALTERNATIVE RR-1-11**

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

**Response to Request for Additional Information Concerning
Proposed Alternative RR-1-11**

On July 2, 2009, the NRC transmitted to Dominion Energy Kewaunee, (DEK) a request for additional information (RAI) concerning proposed alternative RR-1-11 (reference 1). The RAI questions are provided below followed by the DEK response.

NRC Question 1

10 CFR 50.55a(g)(6)(ii)(E) states in part, "All licensees of pressurized water reactors shall augment their inservice inspection program by implementing the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Case N-722 subject to the conditions specified in paragraphs (g)(6)(ii)(E) (2) through (4) of this section." Note (4) to ASME Code Case N-722, Table 1, Item B15.80 requires that, "Personnel performing the VE shall be qualified as VT-2 visual examiners and shall have completed a minimum of four (4) hours of additional training in detection of borated water leakage from Alloy 600/82/182 components and the resulting boric acid corrosion of adjacent ferritic steel components."

The second paragraph on page 6 of the submittal states: "The examiners that performed the RPV BMI penetration examinations during the 2008 refueling outage held current VT-1, VT-2 (non-alternative) and VT-3 qualifications. Each of the examiners successfully completed Boric Acid Corrosion Control (BACC) Inspector Training. In addition to BACC training, each of the examiners was required to review EPRI Technical Report 1006296 (reference 6). Completion of these training activities have been determined to be equivalent to the four (4) hours of additional training cited in Code Case N-722."

- 1) Provide more specific details of the training that the visual examiners received in detection of borated water leakage from Alloy 600/82/182 components.*

Response:

ASME Code Case N-722 (reference 2) contains specific requirements for the qualification of personnel performing the Visual Examinations. Section 4 states:

- (4) Personnel performing the VE shall be qualified as VT-2 visual examiners and shall have completed a minimum of four (4) hours of additional training in detection of borated water leakage from Alloy 600/82/182 components and the resulting boric acid corrosion of adjacent ferritic steel components.*

As stated in Proposed Alternative RR-1-11 (reference 3), the examiners that performed the reactor pressure vessel (RPV) bottom mounted instrument (BMI) penetration examinations during the 2008 refueling outage held current VT-1, VT-2 (non-alternative)

and VT-3 qualifications. Each of the examiners successfully completed Boric Acid Corrosion Control (BACC) Inspector Training in accordance with the BACC Program (reference 5). In addition to completing BACC training, each of the examiners was required to review EPRI Technical Report 1006296 (reference 4). Completion of these training activities have been determined to be equivalent to the four (4) hours of additional training cited in Code Case N-722.

DEK used two examiners to perform the RPV BMI penetration examinations during the 2008 refueling outage. The two examiners worked together while performing the examination of the RPV BMI penetrations. The tables below summarize the certification and training for each of the examiners.

<u>Examiner No. 1</u>		
Experience/Certifications: DEK full time employee as the Inservice Inspection Program owner for Kewaunee Power Station (KPS) since 1991. Certified VT Level II examiner with 1893 hours experience performing VT examinations and 118 documented hours of VT training. In addition to the VT training, Examiner No. 1 has received the following boric acid corrosion related training:		
Training Date	Course Title/Topic	Hours
02/17/04	Boric Acid Corrosion Control Program	1
01/11/06	Boric Acid Corrosion Control (BACC Program)	1
02/01/06	BACC Inspector and Evaluator	2
04/18/07	Boric Acid Corrosion Control and BACC Program	1
12/06/07	BACCP: Boric Acid Corrosion Control Inspections	1
03/29/08	Visual Exam for Leakage of PWR Head Penetrations (EPRI Technical Report 1006296)	4

<u>Examiner No. 2</u>		
Experience/Certifications: Supplemental employee is a certified VT Level III examiner with 13,401 hours performing VT examinations and 70 documented hours of VT training. In addition to the VT training, Examiner No. 2 has received the following boric acid corrosion related training:		
Training Date	Course Title/Topic	Hours
01/07/08	BACCP: Common Boric Acid Corrosion Control	1
03/29/08	Visual Exam for Leakage of PWR Head Penetrations (EPRI Technical Report 1006296)	4

Based upon the certification and training summaries above, the qualifications of the examiners during the KPS 2008 refueling outage are considered equivalent to the personnel qualification requirements of Code Case N-722.

NRC Question 2

- 2) *Detail the number of hours each inspector completed in training to recognize borated water leakage and also detail how these hours were documented.*

Response:

The hours associated with each training item provided to the examiners is provided in the response to NRC Question 1. These hours and courses are documented in the KPS training records for the individuals.

NRC Question 3

- 3) *Provide a reference for the Boric Acid Corrosion Control Program.*

Response:

The reference for the current DEK Boric Acid Corrosion Control Program is provided in reference 6 below. Note that as a result of efforts to convert Kewaunee site specific procedures to Dominion fleet procedures, in 2008 the procedure governing the DEK Boric Acid Control Program changed from GNP-08.06.01 to ER-AP-BAC-10.

References

1. Email from Peter Tam (NRC) to Jack Gadzala, Thomas Breene and Craig Sly (DEK), "Kewaunee - Draft RAI on proposed Alternative No. RR-1-11 (TAC ME1394)," dated July 2, 2009. [ADAMS Accession No. ML091831351]
2. American Society of Mechanical Engineers, Boiler and Pressure Vessel Code (ASME Code) Case N-722, "Additional Examinations for PWR Pressure Retaining Welds in Class 1 Components Fabricated With Alloy 600/82/182 Materials Section XI Division 1," dated July 5, 2005.
3. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "Inservice Inspection Program Fourth Ten-Year Interval, Proposed Alternative No. RR-1-11," dated May 28, 2009. [ADAMS Accession No. ML091520538]
4. EPRI Report 1006296, Revision 2, "Visual Examination for Leakage of PWR Reactor Head Penetrations," dated March 2003.
5. Procedure GNP-08.06.01, Revision 7, "Boric Acid Corrosion Control Inspection and Evaluation," September 25, 2007.
6. Procedure ER-AP-BAC-10, Revision 4, "Boric Acid Corrosion Control Program," dated March 12, 2009.