

ATTACHMENT 5

**LICENSE AMENDMENT REQUEST 249
KEWAUNEE POWER STATION CONVERSION TO IMPROVED TECHNICAL
SPECIFICATIONS**

COMMITMENT LIST

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

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The following list identifies those actions committed to by Dominion Energy Kewaunee (DEK) for the Kewaunee Power Station (Kewaunee) in this document. Any other actions discussed in the submittal represent intended or planned actions; they are described only for information and are not regulatory commitments. Please contact Mr. Gerald O. Riste – ITS Conversion, Licensing, at (920) 388-8424 for any questions regarding this document or any associated regulatory commitments.

<u>No.</u>	<u>Commitment</u>	<u>Due Date/Event</u>
1	DEK will have written procedures available describing the compensatory measures when LCO 3.7.10, Control Room Post-Accident Recirculation (CRPAR) System, ACTION B, “Two CRPAR trains inoperable due to inoperable control room boundary in MODE 1, 2, 3, or 4,” is entered.	Upon Implementation
2	DEK will establish the Technical Specification Bases for LCO 3.0.8, as adopted, with the applicable license amendment.	Upon Implementation
3	DEK will ensure that when LCO 3.0.8a is used, appropriate plant procedures and administrative controls are revised to implement the following Tier 2 Restriction: <ul style="list-style-type: none"> • At least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s), must be available 	Upon Implementation
4	DEK will ensure that when LCO 3.0.8b is used, appropriate plant procedures and administrative controls are revised to implement the following Tier 2 Restriction: <ul style="list-style-type: none"> • At least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s), or some alternative means of core cooling (e.g., F&B, firewater system or “aggressive secondary cooldown” using the steam generators) must be available. 	Upon Implementation

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<u>No.</u>	<u>Commitment</u>	<u>Due Date/Event</u>
5	<p>DEK will ensure that when LCO 3.0.8 is used appropriate plant procedures and administrative controls are revised to implement the following Tier 2 Restriction:</p> <ul style="list-style-type: none"> • Every time the provisions of LCO 3.0.8 are used DEK will confirm that at least one train (or subsystem) of systems supported by the inoperable snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. LCO 3.0.8 does not apply to non-seismic snubbers. In addition, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), implementation of any applicable Tier 2 restrictions, and the associated plant configuration shall be available on a recoverable basis. 	Upon Implementation
6	DEK will revise the USAR or TS Bases to describe the restrictions in commitments 3 and 4.	In Accordance with 10CFR50.71(e)
7	DEK will have written procedures available describing compensatory measures to be taken in the event of an intentional or unintentional entry into LCO 3.7.12, Auxiliary Building Special Ventilation (ASV) System, Condition B, "Two ASV trains inoperable due to inoperable ASV boundary."	Upon Implementation
8	DEK will add procedural direction to perform an extent of condition evaluation and perform additional testing for plausible common failure modes associated with RPS and ESFAS instrument analog channels.	Upon Implementation

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<u>No.</u>	<u>Commitment</u>	<u>Due Date/Event</u>
9	<p>DEK will implement administrative controls to include the above restrictions.</p> <ul style="list-style-type: none"> • Activities that could degrade the availability of the auxiliary feedwater system, reactor coolant system pressure relief (pressurizer PORVs and safety valves), AMSAC (ATWS (Anticipated Transient Without Scram) Mitigating System Actuation Circuitry), or turbine trip should not be scheduled when a RTB is out of service. • Activities that could degrade other components of the RPS, including master relays or slave relays and activities that cause analog channels to be unavailable should not be scheduled when a logic cabinet is unavailable. • Activities on electrical systems that support the systems or functions listed in the first two bullets should not be scheduled when a RTB is unavailable. 	<p>Upon Implementation</p>