



February 15, 2010

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

Serial No. 10-048  
KPS/LIC/JG: R0  
Docket No. 50-305  
License No. DPR-43

**DOMINION ENERGY KEWAUNEE, INC.**  
**KEWAUNEE POWER STATION**  
**INSERVICE TESTING VALVE RELIEF REQUEST VRR-05 REVISION**

Pursuant to 10 CFR 50.55a(a)(3)(ii) Dominion Energy Kewaunee, Inc. (DEK) hereby requests Nuclear Regulatory Commission (NRC) approval of a revision to the following relief request that was previously approved by the NRC for the Kewaunee Power Station (KPS) Fourth Ten-Year Inservice Testing Interval.

- VRR-05: SI-350A, SI-350B, Containment Sump B Supply to RHR Isolation Valves

Relief Request VRR-05 was approved by the NRC for the Fourth Ten-Year Inservice Testing Interval on March 24, 2006 (Reference 1). A clarification to VRR-05 was issued by the NRC on April 20, 2006 (Reference 2).

As currently approved, VRR-05 requires SI-350A and SI-350B to be leakage tested on a refueling outage frequency (i.e., each refueling outage) to ensure valve closure. VRR-05 also requires verification of the valve remote position indication on a 36-month frequency (i.e., every other refueling outage), plus 25% for scheduling flexibility. This request would change the previously approved relief request VRR-05 to specify that leakage testing to verify closure of valves SI-350A and B is only required to be performed during refueling outages when valve remote position indication is not observed locally (as specified by the Code requirement).

Attachment 1 contains the request for revision of KPS Relief Request VRR-05.

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

Very truly yours,

  
J. Alan Price  
Vice President – Nuclear Engineering

Attachments:

1. Request for Revision - Inservice Testing Valve Relief Request VRR-05

References:

1. Letter from L. Ragavan (NRC) to D. A. Christian (DEK), "Kewaunee Power Station – Request for Relief from the Requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Revised Relief Request VRR-05) for the Forth Ten-Year Pump and Valve Inservice Testing Program (TAC No. MC9617)," dated March 24, 2006. [ADAMS Accession NO. ML060720072].
2. Letter from L. Ragavan (NRC) to D. A. Christian (DEK), "Kewaunee Power Station – Clarification Concerning Request for Relief from the Requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Revised Relief Request VRR-05) for the Forth Ten-Year Pump and Valve Inservice Testing Program (TAC No. MC9617)," dated April 20, 2006. [ADAMS Accession NO. ML061000038]

Commitments made in this letter: None

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**Attachment 1**

**REQUEST FOR REVISION  
INSERVICE TESTING VALVE RELIEF REQUEST VRR-05**

**KEWAUNEE POWER STATION**

**DOMINION ENERGY KEWAUNEE, INC.**

**VALVE RELIEF REQUEST VRR-05 REVISION**

- System:** Safety Injection
- Valve(s):** SI-350A, SI-350B, Containment Sump B to RHR Isolation Valves
- Category:** B
- Function:** SI-350A and SI-350B are considered "inside containment" isolation valves, however the valves are physically located within separate enclosures outside of the main containment structure. These valves are in the lines leading from containment sump "B" to the suction of the RHR pumps. The valves perform an active safety function in the open position. SI-350A and B must be capable of opening, by remote manual switch actuation, when transitioning from the injection mode of Safety Injection (SI) to sump recirculation for long-term core cooling. The valves also perform an active safety function in the closed position. SI-350A and B are designated containment isolation valves for penetrations 30W and 30E per KPS USAR Table 5.2-3. The valves must be capable of closing by remote manual switch actuation to maintain containment integrity in the event of a system malfunction.
- Code Requirement:** Valves with remote position indicators shall be observed locally at least once every 2 years to verify that valve operation is accurately indicated. (ASME OM Code, 1998 Edition with the 2000 Addenda) (OMb Code 2000, ISTC-3700)
- Alternate Testing:** For valves SI-350A and SI-350B, perform remote position indication verification on a 36-month frequency, +25% for scheduling flexibility. This verification will normally be performed coincident with preventative maintenance (PM) on the valve motor operators, which is scheduled on a 36-month +25% frequency. The 36-month +25% frequency is based on past preventative maintenance and inspection results, and corresponds with every other 18-month refueling cycle.
- In addition, during every other refueling outage, when remote position indication verification of these valves is not conducted (per Code requirements), the valves will be leakage tested to verify valve closure. These activities, in conjunction with quarterly monitoring of valve stroke times, will ensure reliable operation of the valves, including remote position indication.
- Basis For Relief:** Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is being requested on the basis that compliance with the specified requirements of the Code

would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

These valves are considered "inside containment" isolation valves, however they are physically located outside of the containment structure in separate enclosures. Local observation of the valves during the performance of position indication verification requires that the enclosures be disassembled and removed. Subsequent to reassembly, the enclosures require leak testing. The additional activities involved with this local observation are performed in a radiation area and are time consuming.

It is DEK's position that compliance with the 2-year Code requirement for local observation of valve position indication represents a hardship without a compensating increase in the level of quality and safety.

In lieu of the every 2-year local position indication verification, DEK proposes to conduct the remote position indication verification of valves SI-350A and B on a 36-month frequency, plus 25% for scheduling flexibility. This proposed frequency is consistent with the relief previously granted by the NRC. The proposed 36-month frequency would effectively allow performance of the local position indication verification during every other refueling outage.

In addition, during those refueling outages where local position indication verification of these valves is not performed (i.e. every other refueling outage), the valves will be leakage tested to verify valve closure. These activities, in conjunction with quarterly monitoring of valve stroke times, will ensure reliable operation of the valves, including remote position indication.

The basis for the 36-month local position indication verification frequency is that preventative maintenance on the valve motor operators is scheduled on a 36-month frequency. Since this preventive maintenance also requires disassembly and removal of the enclosures, local position indication verification of the valves can be readily performed coincident with this maintenance without undue hardship. A 25% extension is provided for scheduling flexibility as previously approved.

The original relief request VRR-05 was approved for the Fourth 10-Year Interval via an NRC safety evaluation dated March 24, 2006 (as clarified on April 20, 2006) (References 1 and 2). This requested revision to the original approved relief request would specify that performance of leakage testing to verify closure of valves SI-350A and B is only required during refueling outages where valve local position indication verification is not performed.

The local position indication verification (specified by the Code requirement) is sufficient verification of valve position such that additional leak testing is not required during the same refueling outages.

References:

1. Letter from L. Ragavan (NRC) to D. A. Christian (DEK), "Kewaunee Power Station – Request for Relief from the Requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Revised Relief Request VRR-05) for the Forth Ten-Year Pump and Valve Inservice Testing Program (TAC No. MC9617)," dated March 24, 2006. [ADAMS Accession NO. ML060720072]
2. Letter from L. Ragavan (NRC) to D. A. Christian (DEK), "Kewaunee Power Station – Clarification Concerning Request for Relief from the Requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Revised Relief Request VRR-05) for the Forth Ten-Year Pump and Valve Inservice Testing Program (TAC No. MC9617)," dated April 20, 2006. [ADAMS Accession NO. ML061000038]