

Mendiola, Doris

Subject: FW: 10-116 App for Renewed Oper. License Comments on Draft Supp. 40 To the Generic Env. Impact Statement KPS
Attachments: 001_SerialNo.10-116.pdf

From: Ginger L Melton [mailto:ginger.l.melton@dom.com]
Sent: Tuesday, April 13, 2010 3:42 PM
To: Tam, Peter; Daily, John
Subject: 10-116 App for Renewed Oper. License Comments on Draft Supp. 40 To the Generic Env. Impact Statement KPS

Please note my email address has changed to: ginger.l.melton@dom.com

As a result of the VSP and vacant slots, supervisors are requested to forward to the correct individuals in their organization.

Ginger L. Melton
Administrative Assistant III
Dominion Resources Services
Nuclear Licensing
5000 Dominion Blvd
Glen Allen, VA 23060
(804) 273-4391

2/25/2010
75 FR 6065
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RULES AND DIRECTIVES
BRANCH
USNRC

SUNSI Review Complete
Template = ADM-013

E-KIDS = ADM-03
Call = D. Doyle (did)



April 12, 2010

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

Serial No.: 10-116
LR/MWH R0
Docket No.: 50-305
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC. (DEK)
KEWAUNEE POWER STATION
APPLICATION FOR RENEWED OPERATING LICENSE
COMMENTS ON DRAFT SUPPLEMENT 40
TO THE GENERIC ENVIRONMENTAL IMPACT STATEMENT

By letter dated January 29, 2010, the Nuclear Regulatory Commission (NRC) issued Draft Plant-Specific Supplement 40 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants (GEIS)," regarding the license renewal application (LRA) for Kewaunee Power Station. Enclosed with the letter was a copy of the *Federal Register* notice announcing the availability of the GEIS and the opportunity to submit comments.

Dominion Energy Kewaunee, Inc. (DEK) has reviewed Supplement 40 to the draft GEIS and considers the conclusions to be an accurate and factual representation of the environmental conditions associated with plant operation during the license renewal period. The attachment to this letter provides DEK comments and clarifications concerning the content of the draft GEIS, Supplement 40.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "L. Hartz".

Leslie N. Hartz
Vice President – Nuclear Support Services

Attachment:

1. Dominion Energy Kewaunee Comments on Draft Supplement 40 to the Generic Environmental Impact Statement for License Renewal

Enclosures:

- A. Hazardous Materials Certification of Registration for Registration Year(s) 2009-2010 (Reg. No. 061709 551 056R). Issued to DEK 6/18/2009. Expiration date 6/30/2010
- B. Tennessee Radioactive Waste-License-for-Delivery Number T-WI003-L10. Expiration date 12/31/2010
- C. Generator Site Access Permit Number 0704004220 for DEK. Expiration date 6/28/2010
- D. Kewaunee Well Usage Estimation Spreadsheet

References:

1. Letter from Bo M. Pham (NRC) to D. A Heacock (DEK), "Notice of Availability of the Draft Plant-Specific Supplement 40 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants (GEIS) Regarding Kewaunee Power Station (TAC No. MD9409)," dated January 29, 2010. [ADAMS Accession No. ML093280799]

Commitments made in this letter: None.

cc: Chief, Rulemaking and Directives Branch
U.S. Nuclear Regulatory Commission Division of Administrative Services
Office of Administration, Mailstop TWB 5B01
Washington, DC 20555-0001

U.S. Nuclear Regulatory Commission
Regional Administrator, Region III
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4532

Mr. P. S. Tam, Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint, Mail Stop O8-H4A
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. Daniel Doyle
Environmental Project Manager
U.S. Nuclear Regulatory Commission
Mail Stop O-11F1
Washington, DC 20555-0001

Mr. John Daily
License Renewal Project Manager
U.S. Nuclear Regulatory Commission
Mail Stop O-11F1
Washington, DC 20555-0001

NRC Senior Resident Inspector
Kewaunee Power Station
N490 Highway 42
Kewaunee, WI 54216

Public Service Commission of Wisconsin
Electric Division
P.O. Box 7854
Madison, WI 53707

David Hardtke
Chairman - Town of Carlton
E2334 Lakeshore Road
Kewaunee, WI 54216

ATTACHMENT 1

**DOMINION ENERGY KEWAUNEE COMMENTS ON DRAFT SUPPLEMENT 40 TO
THE GENERIC ENVIRONMENTAL IMPACT STATEMENT FOR LICENSE RENEWAL**

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

Executive Summary

Page xx

DEK Comment:

In the first row of the table, the Human Health impact of KPS License Renewal is specified as 'SMALL TO MODERATE'. This is inconsistent with the conclusions elsewhere in the document where the NRC has concluded that the human health impact from continued operation of KPS during the license renewal term would be 'SMALL'.

Section 1.9 Status of Compliance

Page 1-9, Table 1-2, Row 3

DEK Comment:

DEK has received a renewed certificate of registration for shipment of hazardous materials (Reg. No. 061709 551 056R), provided in Enclosure A. The expiration date of the renewed certificate of registration is 6/30/2010.

Section 1.9 Status of Compliance

Page 1-10, Table 1-2, Row 3

DEK Comment:

DEK did not renew Permit number 0044-48-08 since KPS no longer ships radioactive waste to South Carolina.

Section 1.9 Status of Compliance

Page 1-10, Table 1-2, Row 4

DEK Comment:

DEK has received a renewed license to ship radioactive material to Tennessee (License number T-WI003-L10), provided in Enclosure B. The expiration date of the renewed license is 12/31/2010.

Section 1.9 Status of Compliance

Page 1-10, Table 1-2, Row 5

DEK Comment:

DEK has received a renewed Generator Site Access Permit for Utah (Permit No. 0704004220), provided in Enclosure C. The expiration date of the permit is 6/28/2010.

Section 2.1.1 Reactor and Containment Systems

Page 2-5, Line 11

DEK Comment:

DEK believes "1722" should be changed to "1772." Per the Kewaunee Power Station Facility Operating License (License DPR-43) paragraph 2.C.(1), "Maximum Power Level," DEK is authorized to operate the facility at a steady-state power level not in excess of 1772 megawatts (thermal).

Section 2.1.1 Reactor and Containment Systems

Page 2-5, Lines 14 to 15

DEK Comment:

DEK recommends changing "two reactor coolant pumps" to "one reactor coolant pump." Each of the Kewaunee reactor coolant loops contains one steam generator and one reactor coolant pump. The Kewaunee USAR Section 4.2 provides a description of the reactor coolant system and design.

Section 2.1.5 Power Transmission Systems

Page 2-12, Lines 6 to 8

DEK Comment:

The 50-foot buffer indicated in the statement, "Additionally, there is a 50-foot (15-m) minimum buffer between the ROWs and any waterways and wetlands; however, buffers can vary up to 200 feet (61 m), based on agreements with the landowners or the State," implies that a restriction on vegetation management is in place. However, within 50 feet of waterways and wetlands, selective hand-cutting is an acceptable means of vegetation management.

Sections 2.1.6 and 2.1.7

Page 2-14, Line 27, and Page 2-15, Line 20

DEK Comment:

Two different numbers (approximately 400,000 gpm and 401,200 gpm, respectively) are provided for circulating water flow with two pumps running. While both numbers are correct (401,200 gpm is the rated design flow), DEK suggests replacing both sentences containing these values with the following:

“The flow rate through the circulating water system is approximately 400,000 gpm when both circulating water pumps are running.”

Section 2.1.7.1 Groundwater Use

Page 2-15, Line 11

DEK Comment:

The two on-site groundwater wells are used for the station's potable water supply. DEK suggests adding these on-site groundwater wells to the list of ground water uses in Line 11.

Section 2.1.7.2 Surface Water Use

Page 2-15, Line 27

DEK Comment:

DEK suggests inserting “in the intake forebay” after the words “the water level” to clarify that the water level at the intake forebay is approximately 571 feet when two of the plant's circulating water pumps are in service.

Section 2.2.3.1 Kewaunee Power Station Water Supply Wells

Page 2-19, Lines 29 to 30, and Page 2-20, Table 2-1.

DEK Comment:

The statement, “The KPS wells typically do not withdraw ground water during the summer months” is incorrect. The KPS wells withdraw ground water during all months. The values in Table 2-1, Potable Water Usage (Gallons) at Kewaunee Power Station, between August 2008 and February 2009 are the result of equipment problems. New flow totalizers were installed in March of 2009. Details of monthly and average daily water use from March to December 2009 are provided in the Well Usage Estimation Spreadsheet in Enclosure D.

Section 2.2.4 Surface Water Resources

Page 2-21, Line 17 to Page 2-22, Line 1

DEK Comment:

DEK believes the term “two to three times per quarter” should be changed to “two to three times during the duration of the permit.” This proposed change is consistent with the Wisconsin Pollutant Discharge Elimination System (WPDES) Permit No. 0001571-07-0, Sections 3.2.1.6 and 3.2.3.3 which provides the requirements for Whole Effluent Toxicity (WET) testing at KPS, including required testing frequencies.

Section 2.2.5 Aquatic Resources

Page 2-25, Line 34

DEK Comment:

DEK believes that the year “1983” should be changed to “1893.”

Section 2.2.5 Aquatic Resources

Page 2-26, Lines 31 and 32

DEK Comment:

Regarding the following sentence: “Native fish that consume smelt may have a decreased ability to successfully reproduce because smelt are rich in thiaminase, an enzyme that destroys thiamin, which is necessary for embryo development.” DEK believes that “smelt” in these sentences should be changed to “alewives.”

Section 2.2.6 Terrestrial Resources

Page 2-30, Line 1

DEK Comment:

This line begins with the phrase, “DEK actively manages the Joe Krofta Memorial Forrest...” DEK suggests deleting the word “actively” because use of this term is subject to wide interpretation.

Section 4.5.2 Entrainment

Page 4-4, Line 19

DEK Comment:

The year of the Second Circuit Court of Appeals decision in Riverkeeper vs. EPA was 2007, not 2009 as indicated in the Draft GEIS. Therefore, DEK believes the year "2009" should be changed to "2007," which is the correct date of the court decision.

Section 4.5.3 Impingement

Page 4-10, Line 27

DEK Comment:

Regarding the sentence: "A total of 31 species of fish were collected in entrainment samples during the study year (See Table 4-8)." DEK believes "entrainment" should be changed to "impingement." The subject of this section of the GEIS is impingement and Table 4-8 is a list of impinged fish species.

Section 4.5.3 Impingement

Page 4-15, Line 19

DEK Comment:

Regarding the sentence: "However, the staff concludes that none of mitigation measures considered would eliminate adverse entrainment impacts..." DEK believes that "entrainment" should be changed to "impingement." The subject of this section of the GEIS is impingement.

Section 4.9.6 Historic and Archaeological Resources

Page 4-33, Line 15

DEK Comment:

DEK believes Line 15 should be changed to read "DEK has established a Cultural Resources Protection Plan..."

Section 4.9.6 Historic and Archaeological Resources

Page 4-33, Lines 32 to 33

DEK Comment:

DEK recommends changing this sentence to read "In addition, KPS forwarded its Cultural Resources Protection Plan to the WHS for review and comment. To date, no comments have been received." Letter Serial No. MISC-2009-0057, dated September 30, 2009, forwarded the Kewaunee Power Station Cultural Resources Protection Plan to the Wisconsin Historical Society.

Section 4.11.4 Cumulative Impacts on Socioeconomics

Page 4-46, Lines 35 to 37

DEK Comment:

This sentence should be changed to read "DEK has also established a 'Cultural Resources Protection Plan' to improve the protection of archaeological resources at KPS."

Section 5.2.5 Cost Benefit Comparison

Page 5-6, Line 15

DEK Comment:

DEK recommends changing the term "a-train 'closed' cooling water pump" to "a-train 'component' cooling water pump."

Section 5.2.5 Cost Benefit Comparison

Page 5-6, Line 31

DEK Comment:

DEK believes the term "a diesel building" should be changed to "an EDG room."

Section 5.2.5 Cost Benefit Comparison

Page 5-6, Line 33

DEK Comment:

DEK recommends changing "Open doors for alternate (diesel generator (DG) room cooling)" to "Open doors for alternate DG room cooling."

Sections 8.1, 8.2, 8.3, 8.4 and 8.5

Tables 8-1, 8-2, 8-3, 8-4 and 8-5

DEK Comment:

In the sixth row of each table, the socioeconomic impact of continued KPS operation is characterized as 'SMALL TO MODERATE'. This appears to be inconsistent with the conclusions elsewhere in the document where the staff analyses of environmental impacts of alternatives to license renewal conclude that the socioeconomic impact of continued KPS operation would be 'SMALL'. (For example see line 32 on page xvii and Table 4-17 on page 4-48).

Section F.3.2. Review of Dominion Energy Kewaunee, Inc.'s Process

Page F-18, Line 23

DEK Comment:

DEK recommends changing "the 'central' cooling water (CCW)" to "the 'component' cooling water (CCW)."

Section F.3.2. Review of Dominion Energy Kewaunee, Inc.'s Process

Page F-18, Line 43

DEK Comment:

DEK recommends changing "motor 'drive' auxiliary feedwater" to "motor 'driven' auxiliary feedwater."

Section F.6.2. Review of Dominion Energy Kewaunee, Inc.'s Cost-Benefit Evaluation

Page F-37, Line31

DEK Comment:

DEK recommends changing "(DEK Electric Kewaunee, 2009b)" to "(Dominion Energy Kewaunee, 2009b)."

ENCLOSURE A

**Hazardous Materials Certification of Registration
for Registration Year(s) 2009-2010
(Reg. No. 061709 551 056R)
Issued to DEK 6/18/2009
Expiration Date 6/30/2010**

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

**UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION**



**HAZARDOUS MATERIALS
CERTIFICATE OF REGISTRATION
FOR REGISTRATION YEAR(S) 2009-2010**

Registrant: DOMINION ENERGY KEWAUNEE INC
Attn: THEODORE L. MALONEY
N490 HIGHWAY 42
KEWAUNEE, WI 54216

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of 49 U.S.C. 5108. It is unlawful to alter or falsify this document.

Reg. No: 061709 551 056R **Issued:** 6/18/2009

Expires: 6/30/2010

Record Keeping Requirements for the Registration Program

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

- (1) A copy of the registration statement filed with PHMSA; and
- (2) This Certificate of Registration

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U. S. Department of Transportation upon request.

Each motor carrier (private or for-hire) and each vessel operator subject to the registration requirement must keep a copy of the current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor or vessel (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made available, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, PHH-62, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, 1200 New Jersey Avenue, SE., Washington, DC 20590, telephone (202) 366-4109.

Serial No.: 10-116

ENCLOSURE B

**Tennessee Radioactive Waste-License-for-Delivery
Number T-WI003-L10
Expiration Date 12/31/2010**

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



State of Tennessee
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Radiological Health
3rd Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1532

December 17, 2009

Dominion Kewaunee Power Station
N490 Highway 42
Kewaunee, WI 54216

Attention: Don Allison, Supervisor-Radioactive Material Control

RE: Radioactive Waste License-for-Delivery

Mr. Allison:

Attached to this letter is your Tennessee Radioactive Waste-License-for-Delivery Number T-WI003-L10 issued with an expiration date of December 31, 2010.

If we may be of further assistance, please feel free to contact me at (615) 532-0405.

Sincerely,

A handwritten signature in black ink, appearing to read "MS", written over a horizontal line.

Michael Singleton
Health Physicist
Division of Radiological Health

Attachments:

**State of Tennessee
Department of Environment and Conservation
3rd Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1532**

LICENSEE:

Dominion Kewaunee Nuclear Power Station
N490 Highway 42
Kewaunee, WI 54216

Delivery License Number: T-WI003-L10

Date of Expiration: December 31, 2010

Gentlemen:

Pursuant to Tennessee Department of Environment and Conservation Regulations, and in reliance on statements and representations made by the licensee in application dated November 23, 2009, and Certificate of Nuclear Energy Liability Insurance dated October 15, 2009, a license is hereby issued authorizing the licensee to ship radioactive material described below to a licensed disposal/processing facility within Tennessee. This license is subject to all applicable rules and regulations of the Tennessee Department of Environment and Conservation and orders of the Division of Radiological Health, now or hereafter in effect.

The license authorizes shipment of any radioactive material (except special nuclear material sufficient to form a critical mass) in any chemical and/or physical form and in a quantity not to exceed the possession limit of the licensed recipient.

The licensee is authorized to ship radioactive material from the facility located at:

Kewaunee Power Station
N490 Highway 42
Kewaunee, WI 54216


into or within Tennessee to a disposal/processing facility that is licensed by Tennessee to receive such material.

The licensee shall comply with all applicable provisions of the regulations and conditions of the recipient facility's license.

Effective date of this license: January 1, 2010

**For the Commissioner
Tennessee Department of
Environment and Conservation**

Date: December 17, 2009

By: 

**Michael Singleton
Health Physicist
Division of Radiological Health**

ENCLOSURE C

**Generator Site Access Permit
Number 0704004220 for DEK
Expiration Date 6/28/2010**

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



JON M. HUNTSMAN
Governor

GARY HERBERT
Lieutenant Governor

State of Utah
DEPARTMENT OF ENVIRONMENTAL QUALITY
Division of Radiation Control

Amanda Smith
Acting Executive Director

Dane L. Finerfrock
Division Director



June 25, 2009

Mr. Don Allison
Dominion Energy Kewaunee Inc.
N490 Highway 42
Kewaunee, WI 54216

Dear Mr. Don Allison:

Subject: Generator Site Access Permit Number 0704004220

The Generator Site Access Permit for Dominion Energy Kewaunee Inc. is complete and approved. The expiration date is 6/28/2010.

If you have any questions, please call Edith Barker of my staff at (801) 536-0077.

UTAH RADIATION CONTROL BOARD

Dane L. Finerfrock, Executive Secretary

Enclosure

cc: Allan Erichsen, EnergySolutions
Jule Fausto, DRC Transportation Specialist
Jeff Ginsburg, EnergySolutions

**UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF RADIATION CONTROL
GENERATOR SITE ACCESS PERMIT
ACCESSING A LAND DISPOSAL FACILITY WITHIN UTAH
UNDER THE PERMIT REQUIREMENTS IN R313-26-3**

R313-26 of the Utah Radiation Control Rules establishes the terms for a Generator Site Access Permit Program which authorizes waste generators, waste processors and waste collectors to deliver radioactive wastes to a land disposal facility located within the state.

Name: Dominion Energy Kewaunee Inc. Address: N490 Highway 42 Kewaunee, WI, 54216 Password: 04qm348m <i>Your password is required to renew your permit online. Store this information in a secure location.</i>	Permit Number: 0704004220 Expiration date: 6/28/10
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Conditions:

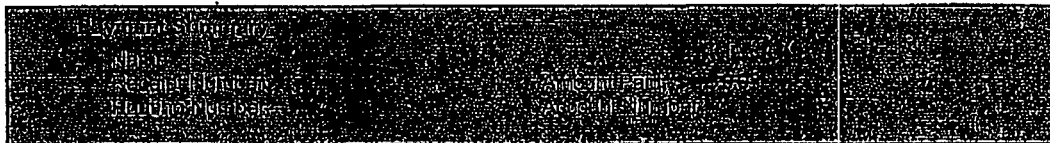
1. The waste generator, waste processor and waste collector shall comply with the provisions of R313-26 and the requirements as set forth in R313-19-100.
2. The permit number shall accompany all waste generator, waste processor and waste collector shipments to the land disposal facilities within the state of Utah.
3. Generator Site Access permittees shall be subject to the provisions of Rule R313-14 for violations of federal regulations, state rules or requirements in the current land disposal facility operating license regarding radioactive waste packaging, transportation, labeling, notification, classification, marking, manifesting or description.

UTAH RADIATION CONTROL BOARD

4/27/07
Registration Date

6/28/09
Activation Date

Dane L. Finerfrock
Dane L. Finerfrock, Executive Secretary



For security reasons, your permit will not be active until after a 72-hour waiting period.

Please note: There will be an adjustment to the expiration date for on-line renewals. Please allow 30 days for expiration adjustment notification.

ENCLOSURE D

Kewaunee Well Usage Estimation Spreadsheet

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

Kewaunee Power Station

2009 Potable Water Usage Numbers

Kewaunee Well Usage Estimation Spreadsheet

End of Month Reading

Month	Well 1A	Well 1B	Monthly Usage Well 1A	Monthly Usage Well 1B	Reading Date	Total Usage (gals)	# of days	(gpd) Average usage per day	(gph) Average usage per hr	(gpm) Average usage per min
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New totalizers installed on both pumps in March 2009. "A" totalizer installed on 3/2/09 and "B" installed 3/3/09.

Mar-09	60,484	23			3/3/09 14:20						
Mar-09	1,688,654	23	1,688,654	23	3/31/09 15:15	1,688,677	28.0	60,228	2509	41.8	
Apr-09	2,313,528	1,135,989	624,874	1,135,966	4/30/09 14:15	1,760,840	30.0	58,776	2449	40.8	
May-09	3,145,926	1,984,293	832,398	848,304	5/29/09 10:00	1,680,702	28.8	58,311	2430	40.5	
Jun-09	5,083,026	1,984,293	1,937,100	0	6/30/09 8:00	1,937,100	31.9	60,692	2529	42.1	
Jul-09	6,282,736	2,378,540	1,199,710	394,247	7/30/09 6:00	1,593,957	29.9	53,280	2220	37.0	
Aug-09	7,249,895	3,210,934	967,159	832,394	8/31/09 8:40	1,799,553	32.1	56,041	2335	38.9	
Sep-09	8,181,820	3,963,829	931,925	752,895	9/30/09 8:40	1,684,820	30.0	56,161	2340	39.0	
Oct-09	9,657,370	3,964,527	1,475,550	698	10/30/09 10:50	1,476,248	30.1	49,061	2044	34.1	
Nov-09	9,962,159	5,097,970	304,789	1,133,443	11/30/09 11:00	1,438,232	31.0	46,384	1933	32.2	
Dec-09	10,539,450	5,976,990	577,291	879,020	12/30/09 8:35	1,456,311	29.9	48,707	2029	33.8	

10,539,450	5,976,990
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2009 Average gallon per day	54,764	Avg gpm	38.0
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