

ATTACHMENT 4

**LICENSE AMENDMENT REQUEST 249: KEWAUNEE POWER STATION
CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS (TAC NO. ME 2139)
SUPPLEMENT TO VOLUMES 1, 2, 8, 13, AND 14**

COMMITMENT LIST

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

COMMITMENT LIST

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 and are described only for information and are not regulatory commitments.

This following list supersedes the list provided in Reference 1 of the cover letter in its entirety. Information within parentheses provides reference to the specific DEK response to NRC RAIs where the commitment was made. These NRC RAIs and DEK responses are contained in the Enclosure to this letter. Please contact Mr. Gerald O. Riste – ITS Conversion, Licensing, at (920) 388-8424 with any questions regarding this document or any associated regulatory commitments.

No.	Commitment	Due Date/Event
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

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No.	Commitment	Due Date/Event
4	<p>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:</p> <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
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"> Each 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 10 CFR 50.71(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	Withdrawn, refer to Enclosure Volume 8 (KAB-077)	N/A

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No.	Commitment	Due Date/Event
9	<p>DEK will implement administrative controls to include the following 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. 	Upon implementation
10	<p>DEK commits to include in the USAR a requirement to maintain a 5% design margin for the batteries describing how this design margin is required to allow the use of a 2 amp float current value that is an indication that the battery is 95 percent charged. (GMW-007) (Duplicated in Commitment 12 but included here for completeness.)</p>	In accordance with 10 CFR 50.71(e)
11	<p>DEK commits to incorporating the expected/qualified life of the safety related batteries in the battery monitoring program in the USAR. (GMW-009)</p>	In accordance with 10 CFR 50.71(e)

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No.	Commitment	Due Date/Event
12	<p>DEK commits to change or verify the Kewaunee USAR describes:</p> <ol style="list-style-type: none"> 1. The requirement to maintain a 5% design margin for the batteries describing how this design margin is required to allow the use of a 2 amp float current value as an indication that the battery is at least 95 percent charged. 2. The minimum established design limit for battery terminal float voltage. 3. The minimum established design limit for electrolyte level. 4. The minimum established design limit for electrolyte temperature. 5. The minimum requirements for the alternate means (i.e., spare battery charger) that is used to obtain an extended battery charger completion time (CT). (GMW-014) 	<p>In accordance with 10 CFR 50.71(e)</p>
13	<p>DEK commits to change (or verify) procedure(s) to include the measuring and test equipment manufacturer's recommended practice for instrument stabilization when measuring float current to confirm battery state of charge. (GMW-014)</p>	<p>Upon implementation</p>
14	<p>DEK commits to including vital switchgear and battery room temperature limits in the USAR. (MEH-009)</p>	<p>In accordance with 10 CFR 50.71(e)</p>
15	<p>DEK has committed in the GL 2008-01 letter to monitor the status of the industry/NRC Technical Specification Task Force (TSTF) Traveler to be developed as a follow-up to GL 2008-01. Following NRC approval of this TSTF, DEK will adopt applicable portions of the Traveler. (MEH-002)</p>	<p>Following NRC approval of the TSTF, on a schedule consistent with the commitment made in the response to GL 2008-01.</p>