



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 16, 2010

LICENSEE: Dominion Energy Kewaunee, Inc.

FACILITY: Kewaunee Power Station

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL BETWEEN DOMINION ENERGY KEWAUNEE, INC. AND THE U.S. NUCLEAR REGULATORY COMMISSION CONCERNING A DRAFT REQUEST FOR ADDITIONAL INFORMATION PERTAINING TO THE KEWAUNEE POWER STATION LICENSE RENEWAL APPLICATION (TAC NO. MD9408)

On August 26, 2010, the U.S. Nuclear Regulatory Commission (NRC or the staff) conducted a telephone conference call with representatives from Dominion Energy Kewaunee, Inc. to discuss and clarify one of the NRC's draft requests for additional information (RAI) concerning the Kewaunee Power Station license renewal application. The telephone conference call was useful in clarifying the intent of the staff's draft RAI.

Enclosure 1 provides a listing of the participants and enclosure 2 contains the draft RAI that was discussed with the applicant and a brief summary of the status.

The applicant had an opportunity to comment on this summary.

A handwritten signature in cursive script, reading "Daniel Doyle", is positioned above the typed name.

Daniel Doyle, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosures:
As stated

cc w/encl: Distribution via Listserv

LIST OF PARTICIPANTS
KEWAUNEE POWER STATION
LICENSE RENEWAL APPLICATION
TELEPHONE CONFERENCE CALL

August 26, 2010

PARTICIPANTS

AFFILIATION

Daniel Doyle

U.S. Nuclear Regulatory Commission (NRC)

Cliff Douth

NRC

Paul Aitken

Dominion Energy Kewaunee, Inc. (DEK)

Charlie Sorrell

DEK

Marc Hotchkiss

DEK

Paul Thomas

DEK

DRAFT REQUEST FOR ADDITIONAL INFORMATION
KEWAUNEE POWER STATION
LICENSE RENEWAL APPLICATION

On August 26, 2010, the U.S. Nuclear Regulatory Commission (NRC or the staff) conducted a telephone conference call with representatives from Dominion Energy Kewaunee, Inc. (DEK or the applicant) to discuss and clarify one of the NRC's draft requests for additional information concerning the Kewaunee Power Station license renewal application.

RAI B2.1.21-1a, Kewaunee RAI on Submerged Inaccessible Low Voltage Cables

Background:

NUREG-1801, Rev. 1, "Generic Aging Lessons Learned," (the GALL Report) addresses inaccessible medium voltage cables in Aging Management Program (AMP) XI.E3, "Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements." The purpose of this program is to provide reasonable assurance that the intended functions of inaccessible medium voltage cables (2 kV to 35 kV), that are not subject to environmental qualification requirements of 10 CFR 50.49 and are exposed to adverse localized environments caused by moisture while energized, will be maintained consistent with the current licensing basis. The scope of the program applies to inaccessible (in conduits, cable trenches, cable troughs, duct banks, underground vaults or direct buried installations) medium-voltage cables within the scope of license renewal that are subject to significant moisture simultaneously with significant voltage.

The application of AMP XI.E3 to medium voltage cables was based on the operating experience available at the time Revision 1 of the GALL Report was developed. However, recently identified industry operating experience indicates that the presence of water or moisture can be a contributing factor in inaccessible power cables failures at lower service voltages (480 V to 2 kV). Applicable operating experience (OE) was identified in licensee responses to Generic Letter (GL) 2007-01, "Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients," which included failures of power cable operating at service voltages of less than 2 kV where water was considered a contributing factor. The staff has proposed changes to be included in the next revision of the GALL Report AMP XI.E3 to address recently identified operating experience concerning the failure of inaccessible low voltage power cables, which includes general water intrusion as a failure mechanism and increases the scope of program to include power cables greater than or equal to 480 V.

Issue:

The staff has concluded, based on recently identified industry operating experience concerning the failure of inaccessible low voltage power cables (480 V to 2 kV) in the presence of significant moisture, that these cables should be included in an aging management program. The staff notes that your aging management program does not address these low voltage cables.

Request:

1. Provide a summary of your evaluation of recently identified industry operating experience and any plant specific operating experience concerning inaccessible low voltage power cable failures within the scope of license renewal (not subject to 10 CFR 50.49 environmental qualification requirements), and how this operating experience applies to the need for additional aging management activities at your plant for such cables.
2. Provide a discussion of how Kewaunee Power Station will manage the effects of aging on inaccessible low voltage power cables within the scope of license renewal and subject to aging management review; with consideration of recently identified industry operating experience and any plant specific operating experience. The discussion should include assessment of your aging management program description, program elements (i.e., Scope of Program, Parameters Monitored/Inspected, Detection of Aging Effects, and Corrective Actions), and FSAR summary description to demonstrate reasonable assurance that the intended functions of inaccessible low voltage power cables subject to adverse localized environments will be maintained consistent with the current licensing basis through the period of extended operation.

Discussion:

The staff and the applicant discussed the RAI and the recently submitted annual update by the applicant. As a result, the staff will revise its RAI

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/RA/

Daniel Doyle, Project Manager
Projects Branch 1
Division of License Renewal
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Memorandum to Dominion Energy Kewaunee from D. Doyle, September 16, 2010

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DOMINION ENERGY KEWAUNEE, INC. AND THE U.S. NUCLEAR
REGULATORY COMMISSION CONCERNING A REQUEST FOR
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POWER STATION LICENSE RENEWAL APPLICATION (TAC NO.
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