



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 31, 2010, the U.S. Nuclear Regulatory Commission (NRC or the staff) conducted a telephone conference call with representatives from Dominion Energy Kewaunee, Inc. (the applicant) to discuss and clarify one of the NRC's draft requests for additional information (RAIs) 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.

Regarding Request 1, the applicant understood the concern and will respond appropriately.

The applicant requested withdrawal of Request 2. To justify this request, the applicant stated that, in accordance with standard industry practice, the UFSAR supplement will describe the AMPs as they will be implemented at Kewaunee Power Station but will not specifically point out all enhancements or exceptions made to the AMPs as described in the Generic Aging Lessons Learned Report. The staff accepted this explanation and will withdraw Request 2.

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

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

**August 31, 2010**

**PARTICIPANTS**

Daniel Doyle  
Allen Hiser  
James Medoff  
Paul Aitken  
Dave Lippard  
Marc Hotchkiss  
Ben Rodill

**AFFILIATION**

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**DRAFT REQUEST FOR ADDITIONAL INFORMATION  
KEWAUNEE POWER STATION  
LICENSE RENEWAL APPLICATION**

On August 31, 2010, the U.S. Nuclear Regulatory Commission (NRC or the staff) conducted a telephone conference call with representatives from Dominion Energy Kewaunee, Inc. (the applicant) to discuss and clarify one of the NRC's draft requests for additional information (RAIs) concerning the Kewaunee Power Station license renewal application (LRA).

**Supplemental RAI B2.1.32-5a**

**Background**

Dominion Serial Letter No. 09-188, dated April 13, 2009, provided the supporting documentation in an attempt to justify that the past periodic surveillance and preventative maintenance activities for the Work Control Process (WCP) provide sufficient evidence that ample inspection opportunity would exist to the components that the WCP is credited for managing. Dominion Serial Letter No. 09-597, dated September 25, 2009, provided a change in status for the WCP, changing the aging management program (AMP) from a plant-specific AMP to an AMP that, with an enhancement, will be consistent with the criteria in Generic Aging Lessons Learned (GALL) AMP XI.M32, "One Time Inspection," when applied on a one-time inspection basis, and with the criteria in GALL AMP XI.M38, "Internal Inspection of Miscellaneous Piping and Ducting Components," as subject to four exceptions taken to the GALL AMP XI.M38 criteria. Dominion Serial Letter No. 09-777, dated January 21, 2010, provided the applicant's responses to RAI Nos. B2.1.32-1, B2.1.32-2, B2.1.32-3, and B2.1.32-4. Dominion Serial Letter No. 10-286, dated May 13, 2010, provides the applicant's responses to RAI B2.1.35, Requests 1-4.

In RAI B2.1.32-5, Request 2, the staff asked the applicant: (1) to specify and justify the minimum percentage of components that will be used to establish the sample sizes for the component populations that are associated with the WCP and that will be managed by the WCP on a periodic condition monitoring basis, and (2) for these component populations, to specify and justify the maximum frequency that would be applied to the components in the sample sets for the populations. The applicant replied to RAI B2.1.32-5, Request 2, in Dominion Serial Letter No. 10-286. In its response to RAI B2.1.32-5, Request 2, the applicant continues to use a historical basis to support its position that the samples sizes and visual examination frequencies did not need to be defined for the material-environment-aging effect combinations that the AMP will manage on a period condition monitoring basis.

In RAI B2.1.32-5, Request 4, the staff asked the applicant to resolve several inconsistencies with the Updated Final Safety Analysis Review (UFSAR) Supplement A2.1.32, and the applicant's enhancement of the WCP, as given in LRA AMP B2.1.32, and amended in Serial Letter No. 09-777, and as reflected in LRA Commitment No. 25, which has been placed in LRA UFSAR Supplement Table A6.0-1. The applicant replied to RAI B2.1.32-5, Request 4, in Dominion Serial Letter No. 10-286.

Title of 10 of the *Code of Federal Regulations* (10 CFR) 54.21(a)(3) requires that, for each structure and component that is scoped in for license renewal in accordance with one of the LRA scoping requirements in 10 CFR 54.4 and that is required to be screened in for an aging management review (AMR) in accordance with the LRA screening requirements in 10 CFR 54.21(a)(1), the applicant must "demonstrate that the effects of aging will be adequately managed so that the intended function(s) will be maintained consistent with the current licensing basis for the period of extended operation."

### **Issue 1**

The request in RAI B2.1.32-5, Request 2, reflects an unresolved issue that the implementation of the WCP, when applied as a periodic condition monitoring program, could leave some doubt as to what the samples sizes would be for material-environment-aging effect component populations that the AMP manages, and whether the components in the sample sets would actually ever be scheduled for periodic inspection during the period of extended operation. The staff notes that the current basis for the program, as supplemented in the response to RAI B2.1.32-5, Request 2, still cannot ensure that the components in the sample sets will be inspected at least twice during the period of extended without the need to establish a limit criterion on the maximum amount of time that could elapse before the components in the sample sets would need to be scheduled (with certainty) for inspection on a periodic basis. Thus, the response to RAI B2.1.32-5 does not resolve the staff's concern that the WCP's sampling-based, condition monitoring basis may not ever actually schedule the components in these sample sets for inspection or perform inspections of the components in the sample set more than once during the period of extended operation.

### **Request 1**

Since implementation of the WCP does not assure that the components in the sample sets will be inspected at any point during the period of extended operation, describe how the WCP will be modified to ensure a limit on the maximum amount of time that will elapse before the components in the sample sets will be inspected (e.g., one time each during the first and the last 10 years of the period of extended operation).

### **Issue 2**

In RAI B2.1.32-5, Request 4, the staff requested that the applicant clear up apparent inconsistencies between the enhancement of the WCP, as discussed and supplemented in Dominion Serial Letter No. 09-777 and reflected in LRA Commitment No. 25 and the UFSAR supplement for the AMP, as given in LRA Section A2.1.32. The response to RAI B2.1.32-5, Request 4, appears to have a self evident contradiction in it, in that the response indicates that the program no longer includes an enhancement but later on cites text for the following enhancement:

#### ***Enhancements***

*The Work Control Process program is a new program that will be consistent with the recommendations of NUREG-1801, Section XI.M32, "One Time Inspection," and NUREG 1801, Section XI.M38, "Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components."*

~~This commitment is reflected in Appendix A, Table 6.0-1, License Renewal Commitments, Item 25.~~

In addition, the statement that the WCP will be implemented consistent with the recommendations of NUREG-1801, Section XI.M32, "One Time Inspection," and NUREG 1801, Section XI.M38, "Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components," is also reflected in the most current UFSAR supplement for this AMP, as given on Page 3 of Attachment 2 in Dominion Serial Letter No. 09-597. However, Dominion Serial Letter No. 09-597 also indicated that the WCP, as credited on a periodic condition monitoring, would be consistent with program element criteria in GALL AMP XI.M38, except for four exceptions that were taken to the program element criteria in GALL AMP. Thus, neither the most current version of UFSAR Supplement A2.1.32, as reflected in Dominion Serial Letter No. 09-597, nor the response to RAI B2.1.32-5, as given in Dominion Serial Letter No. 10-286, clearly reflect the fact that the implementation of the WCP, when implemented on a periodic condition monitoring basis, would not be entirely consistent with the program element criteria in GALL AMP XI.M38 in that four exceptions were taken to the GALL AMP.

## **Request 2**

The staff requests the applicant amend the UFSAR Supplement A2.1.32 and the enhancement statement in the response RAI B2.1.32-5, Request 4 (i.e., Dominion Serial Letter No. 10-286) to reflect the fact the implementation of the program, when done on periodic condition monitoring basis, will be consistent with the program element criteria in GALL AMP XI.M38, "Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components," except for those stated exceptions that were taken to GALL AMP XI.M38 in Dominion Serial Letter No. 09-597.

September 16, 2010

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**/RA/**

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

Docket No. 50-305

Enclosures:  
As stated

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Memorandum to Dominion Energy Kewaunee from Daniel Doyle dated  
September 16, 2010

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(TAC NO. MD9408)

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