

September 8, 2010

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

Serial No. 10-521
LIC/GOR/R0
Docket No.: 50-305
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
LICENSE AMENDMENT REQUEST 249: KEWAUNEE POWER STATION
CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS (TAC NO. ME2139) –
SUPPLEMENT TO VOLUMES 8 AND 16

By letter dated August 24, 2009 (reference 1), as supplemented by letters dated May 12, 2010 (reference 2), April 13, 2010 (two letters) (references 3 and 4), October 22, 2009, (reference 5), July 1, 2010 (reference 6), July 16, 2010 (reference 7), and August 18, 2010 (reference 8), Dominion Energy Kewaunee, Inc. (DEK) submitted an application to amend the Kewaunee Power Station (Kewaunee) Technical Specifications. This application, License Amendment Request 249 (LAR 249), requested a conversion of the current Technical Specifications (CTS) to the Improved Technical Specifications (ITS), consistent with the Improved Standard Technical Specifications (ISTS) as described in NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 3.0, and certain generic changes to the NUREG.

The purpose of this letter is to supplement the subject application. Specifically, this letter complements and revises the original license amendment request based on responses to U.S. Nuclear Regulatory Commission (NRC) requests for additional information (RAIs). These RAIs and the associated DEK responses are posted on a publicly available website, the NRC and DEK Kewaunee ITS Conversion Website (<http://www.excelservices.com>), and are hereby docketed by submittal of this letter.

In the August 18, 2010 letter (reference 8) DEK identified a change to ITS 5.5.15.a.3 that was to be included in the final supplement that transmits a "clean copy" of the proposed Kewaunee Improved Technical Specifications. However, the subsequent resolution of RAI KAB-084 requires revision of Volume 16, ITS Section 5.0. Therefore, a supplemental revision of Volume 16 is attached, in its entirety, to this letter that includes the previously identified change to ITS 5.5.15.a.3, as well as the changes related to KAB-084. In addition, through discussions with NRC, DEK has determined that formal submission of a "clean copy" of the proposed Kewaunee Improved Technical Specifications is not necessary.

In addition, after DEK sent Reference 8, another RAI was issued (via the website) concerning information contained in Volume 8, "ITS Section 3.3 - Instrumentation."

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DEK responded to the RAI, updated the information in Volume 8, and hereby resubmits the entire Volume.

To facilitate NRC review of LAR 249, the proposed ITS conversion was divided into 14 sections. The NRC assigned reviewers to review specific sections. Each section and its associated NRC reviewer are listed in Attachment 2. On the ITS Conversion Website, each RAI is uniquely identified by the initials of the NRC staff member who initiated the RAI and a corresponding sequential number. Included in Attachment 2 is a table that lists the RAIs submitted by the NRC reviewers and designates DEKs supplement in which the RAI and DEKs response is located.

This letter replaces the following Reference 8 and Reference 7 Attachment 1, Revision 1 Volumes, respectively:

- Volume 8, ITS Section 3.3, Instrumentation
- Volume 16, ITS Section 5.0, Administrative Controls

Previous letters dated July 1, 2010 (reference 6), July 16, 2010 (reference 7) and August 18, 2010 (reference 8) provided supplements to Revision 0 Volumes. Specifically, supplements to Volumes 3, 4, 5, 6, 9, 11, and 15 were provided in reference 6, supplements to Volumes 7, 10, 12, and 16 were provided in reference 7, and supplements to Volumes 1, 2, 8, 13 and 14 were provided in reference 8.

A Summary of Changes page is included at the beginning of each Volume. Each Summary of Changes page identifies all changes made to the previous submittal (Revision 1), including a brief description of the change and the affected page numbers in the Revision 2 Volume. Attachment 1 of this letter provides the detailed descriptions and justifications to support the proposed changes.

The affected Revision 2 pages have a revision bar to the right of each change to aid in identification. These revision bars are color-coded either black or red to show the changes and differentiate between Revision 1 and Revision 2 changes. Black bars are used to depict the changes from Revision 0 to Revision 1, and red bars are used to depict the changes from Revision 1 to Revision 2. Additional details related to each specific change can be obtained by reviewing the RAI/response information located in the Enclosure.

The Enclosure to this letter also contains the NRC RAIs and the associated DEK responses for Volumes 8, and 16. Each RAI/response includes the question asked by the NRC staff reviewer, the DEK response, proposed changes to pages contained in LAR 249 Attachment 1 (CTS, Discussion of Changes (DOCs), ITS, Justification for Deviations (JFDs), ITS Bases, and/or Bases JFD pages), any attached supporting documentation, and RAI closure documentation. In the Enclosure, a blue coloring identifies the changes submitted in Reference 1 (Revision 0). The changes to Revision 0 are a different color for ease of identification.

During a review of the incorporation of all the changes to ITS, DEK found two typographical errors. One error is in ITS Section 1.1, Definitions. The definition for Dose Equivalent XE-133 states in part, "as the combined activities on noble gas nuclides". The definition should state, "as the combined activities of noble gas nuclides". The second error is in Section 3.5, Emergency Core Cooling Systems, SR 3.5.3.1. SR 3.5.3.1 references SR 3.5.2.3. SR 3.5.2.3 was deleted as part of DEKs response to NRC RAI MEH-002. Therefore, SR 3.5.2.3 should be deleted in SR 3.5.3.1. DEK requests these changes be made.

DEK has evaluated these proposed changes in accordance with 10 CFR 50.91(a)(1) using the criteria of 10 CFR 50.92(c), and has concluded that the determination of no significant hazards considerations in the original ITS submittal remains valid. In addition, DEK has determined that the proposed amendment, including this supplement to the original ITS submittal, continues to meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(b), and no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

DEK continues to request approval of the proposed amendment and an implementation period as stated in Reference 1.

A copy of this supplement has been provided to the State of Wisconsin in accordance with 10 CFR 50.91(b).

If you have any questions or require additional information, please contact Mr. Gerald O. Riste at (920) 388-8424.

Dominion Energy Kewaunee, Inc.
Kewaunee Power Station
License Amendment Request 249: Kewaunee Power
Station Conversion to Improved Technical Specifications
(TAC No. ME2139) – Supplement to Volumes 8, and 16
Serial No. 10-521
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The enclosed DVD contains the following files:

	File Name	File Size	Sensitivity
001	Attachment 1.pdf	65,536 bytes	publicly available
002	Att 1 Volume 08 (Section 3.3) Rev 2.pdf	4,042,752 bytes	publicly available
003	Att 1 Volume 16 (Chapter 5.0) Rev 2.pdf	1,646,592 bytes	publicly available
004	Attachment 2.pdf	92,162 bytes	publicly available
005	Enclosure.pdf	65,536 bytes	publicly available
006	Enc Q&A to Att 1 Vol 08 Rev 2.pdf	509,952 bytes	publicly available
007	Enc Q&A to Att 1 Vol 16 Rev 2.pdf	378,880 bytes	publicly available

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References:

1. Letter from Leslie N. Hartz (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications (TAC NO. ME02467)," dated August 24, 2009. [ADAMS Accession No's ML092440371, ML092440416 through ML092440435, and ML092440441]
2. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications – Request to Change Proposed Service Water and Main Steam Isolation Valve Specifications," dated May 12, 2010. [ADAMS Accession No. ML101380399]
3. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249 (TAC No. ME02467) Conversion to Improved Technical Specifications Response to Request for Additional Information RE: TSTF-490," dated April 13, 2010. [ADAMS Accession No. ML101060517]
4. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249: (TAC No. ME02467) Conversion to Improved Technical Specifications - Setpoint Methodology," dated April 13, 2010. [ADAMS Accession No. ML101040090]
5. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Conversion to Improved Technical Specifications - Setpoint Methodology Supplement (TAC NO. ME02467)," dated October 22, 2009. [ADAMS Accession No. ML093070096]
6. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications (TAC NO. ME2139) – Supplement to Volumes 3, 4, 5, 6, 9, 11, and 15, and Proposed License Conditions," dated July 1, 2010. [ADAMS Accession No. ML101890176]
7. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications (TAC NO. ME2139) – Supplement to Volumes 7, 10, 12, and 16, and Proposed License Conditions," dated July 16, 2010. [ADAMS Accession No. ML102370369]
8. Letter from Leslie N. Hartz (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications (TAC NO. ME2139) – Supplement to Volumes 1, 2, 8, 13 and 14," dated August 18, 2010. [ADAMS Accession No. ML102371023]