Dominion Energy Kewaunee, Inc.
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Dominion®

November 9, 2010

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

Serial No.: 10-665
LR/MWH R0
Docket No.: 50-305
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
SUPPLEMENTAL INFORMATION FOR THE REVIEW OF THE KEWAUNEE POWER STATION LICENSE RENEWAL APPLICATION

During a telephone conference held on Thursday, November 5, 2010, members of the NRC and Dominion Energy Kewaunee, Inc. (DEK) staffs discussed the license renewal commitment 43 to inspect ASME Class 1 small-bore piping socket welds in support the Kewaunee Power Station (KPS) license renewal application (LRA) (reference 1). As a result of the conference call, DEK is supplementing its response to RAI B2.1.2-2, which was submitted to the NRC in Reference 2. Attachment 1 to this letter provides the supplemental response to RAI B2.1.2-2.

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

Very truly yours,

J. Alan Price
Vice President – Nuclear Engineering

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and State aforesaid, today by J. Alan Price, who is Vice President – Nuclear Engineering of Dominion Energy Kewaunee, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 9th day of November, 2010.

My Commission Expires: 4/30/13

Ginger L Melton
Notary Public

I was commissioned a notary as Ginger L. Alligood.

GINGER LYNN MELTON
Notary Public
Commonwealth of Virginia
310847
My Commission Expires Apr 30, 2013

Attachment:

1. Supplemental Response to RAI B2.1.2-2

References:

1. Letter from D. A. Christian (DEK) to NRC, "Kewaunee Power Station Application for Renewed Operating License," dated August 12, 2008. [ADAMS Accession No. ML082341020]
2. Letter from L. N. Hartz (DEK) to NRC, "Response to Request for Additional Information for the Review of the Kewaunee Power Station License Renewal Application," dated September 23, 2010. [ADAMS Accession No. ML102700162]

Commitments made in this letter:

1. License Renewal Commitment 43 will be revised consistent with the supplemental response to RAI B2.1.2-2. The revised commitment is proposed to support approval of the renewed operating license, and may change during the NRC review period.

cc: U.S. Nuclear Regulatory Commission
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ATTACHMENT 1

SUPPLEMENTAL RESPONSE TO RAI B2.1.2-2

KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.

Supplemental Response to RAI B2.1.2-2

During a telephone conference held on Thursday, November 5, 2010, members of the NRC and Dominion Energy Kewaunee, Inc. (DEK) staffs discussed the Kewaunee license renewal commitment 43 to inspect ASME Class 1 small-bore piping socket welds. The NRC staff indicated that a position on appropriate sample size for Class 1 small-bore piping welds had been established and will be included in NUREG-1801, Revision 2, *Generic Aging Lessons Learned (GALL) Report*, Section XI.M35. The stated NRC staff position is as follows:

> *If an applicant has never experienced a failure (a through-wall crack detected in the subject component by evidence of leakage, or through nondestructive or destructive examination) in its Class 1 small bore piping and has extensive operating history (more than 30 years of operation at time of submitting the application), the inspection sample size may be as low as 3% of the weld population or a maximum of 10 welds of each weld type for each operating unit. For socket welds, opportunistic destructive examination can be performed in lieu of volumetric examination. Because more information can be obtained from a destructive examination than from nondestructive examination, the applicant may take credit for each weld destructively examined equivalent to having volumetrically examined two welds.*

As a result of the conference call, DEK is supplementing its response to RAI B2.1.2-2, which was previously submitted, as amended, in DEK letter 10-548 dated September 23, 2010 [ADAMS ML102700162]. At Kewaunee, there are currently a total of 345 socket welds in ASME Class 1 small-bore piping systems. Therefore, the total number of ASME Class 1 socket welds that will be subject to volumetric examination is 10 welds. In the event that a demonstrated, nuclear-industry endorsed, inspection methodology is not available, destructive examinations of socket welds will be substituted for volumetric non-destructive examinations. Each destructive weld examination will be considered equivalent to performing two volumetric weld examinations, such that a maximum of five destructive examinations will be performed.

A minimum of four volumetric examinations or two destructive examinations (or an equivalent combination of examinations) will be performed prior to the period of extended operation. To allow for orderly planning and scheduling of plant resources and outage workload, the remaining examinations will be performed within three years of entering the period of extended operation. The extended schedule for performance of the remaining examinations is reasonable based on the plant-specific operating experience for the ASME Class 1 small-bore piping welds.

Commitment 43 in LRA Appendix A, USAR Supplement, Table A6.0-1 is superseded by the following:

Item	Commitment	Source	Schedule
43	Ten volumetric examinations of ASME Class 1 small-bore socket welds will be performed using a demonstrated, nuclear-industry endorsed, inspection methodology that can detect cracking within the specified examination volume, if a methodology becomes available. In the event that a demonstrated, nuclear-industry endorsed, inspection methodology is not available, destructive examinations of socket welds will be substituted for volumetric non-destructive examinations. Each destructive weld examination will be considered equivalent to performing two volumetric weld examinations, such that a maximum of five destructive examinations will be performed.	Letter 10-665; Supplemental Response to RAI B2.1.2-2	Four volumetric examinations or two destructive examinations (or an equivalent combination of examinations) prior to the period of extended operation. Remaining examinations within three years of entering the period of extended operation