

December 2, 2010

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

Serial No. 10-693
LIC/GOR/R1
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) –
REITERATION OF POSITION AND REVISED SUBMITTAL PAGES

By letter dated August 24, 2009 (reference 1), as supplemented by letters dated October 22, 2009 (reference 2), May 12 (reference 3), April 13 (two letters) (references 4 and 5), July 1 (reference 6), July 16 (reference 7), August 18 (reference 8), September 7 (reference 9), September 8 (reference 10), and October 15 2010 (reference 11), 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 twofold. First, this letter is intended to reiterate DEKs position that this proposed amendment request does not expand Kewaunee's licensing basis to include design basis events other than those presently described in the Kewaunee Power Station Updated Safety Analysis Report (USAR). DEK originally presented this position in Reference 1. Second, this letter provides changes to the proposed KPS ITS Bases and other information previously submitted.

DEK has recently discovered some inconsistencies between the KPS USAR and the wording of the proposed ITS Bases in Reference 1. Attached to this letter are proposed changes to previously submitted information that DEK believes could be construed as changing Kewaunee's current licensing basis to include design basis accidents or events not presently postulated, as contained in Kewaunee's USAR. Please note that the proposed changes in the Attachment are marked-up using red text while the originally proposed changes are shown in blue text.

DEK has evaluated the impact of this letter 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.

ADD
NRR

Enclosed with this letter is a digital video disk (DVD) which contains this submittal's Attachment, labeled:

Dominion Energy Kewaunee, Inc.
Kewaunee Power Station
License Amendment Request 249: Kewaunee Power
Station Conversion to Improved Technical Specifications (TAC No. ME2139) –
Reiteration of Position and Revised Submittal Pages
Serial No. 10-693
Docket No.: 50-305
License No.: DPR-43

The enclosed DVD contains the following files:

	File Name	File Size	Sensitivity
001	Attachment.pdf	53,988 bytes	publicly available
002	Revised Pages.pdf	489,472 bytes	publicly available

cc: Regional Administrator, Region III
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Kewaunee Power Station

Public Service Commission of Wisconsin
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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. ML092440398]
2. 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]
3. 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]
4. 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]
5. 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]
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. ML102370370]
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. ML102371064]
9. 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) – Submittal of Information Requested by NRC Staff," dated September 7, 2010. [ADAMS Accession No. ML02730383]

10. 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 8 and 16," dated September 8, 2010. [ADAMS Accession No. ML102580700]
11. 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 Volume 8," dated October 15, 2010. [ADAMS Accession No. ML102920037]