



U.S. Nuclear Regulatory Commission June 11, 2012
Attention: Document Control Desk
Washington, DC 20555

Serial No. 12-206B
NL&OS/WDC R0
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
90 DAY RESPONSE TO MARCH 12, 2012 INFORMATION REQUEST
REGARDING RECOMMENDATION 9.3 FOR EMERGENCY PREPAREDNESS

Reference: NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012.

On March 12, 2012, the Nuclear Regulatory Commission (NRC) staff issued the referenced letter. Enclosure 5 of the letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests. The letter also specified due dates for written responses.

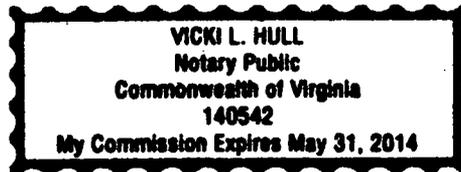
In accordance with the referenced letter, on May 9, 2012, Dominion Energy Kewaunee, Inc. (DEK) submitted an alternative course of action for providing the requested information. The alternative course of action included revised information due dates and the basis for those dates. As described in the alternative course of action, this letter transmits the responses to the following information requests.

- Enclosure 5, Communications request #2
- Enclosure 5, Staffing request #3
- Enclosure 5, Staffing request #4
- Enclosure 5, Staffing request #5

If you have any questions regarding this information, please contact Craig Sly at (804) 273-2784.

Sincerely,

David A. Heacock
President and Chief Nuclear Officer
Dominion Energy Kewaunee, Inc.



COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by David A. Heacock, who is President and Chief Nuclear Officer 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 11th day of June, 2012.

My Commission Expires: May 31, 2014
Vicki L. Hull
Notary Public

A001
NRR

Commitments made in this letter: No new regulatory commitments.

Enclosures:

1. Actions And Requested Information Associated With Recommendation 9.3 for Emergency Preparedness – Communications
2. Actions And Requested Information Associated With Recommendation 9.3 for Emergency Preparedness – Staffing

cc: U.S. Nuclear Regulatory Commission, Region III
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ENCLOSURE 1

**PROPOSED ALTERNATIVE COURSE OF ACTION FOR RESPONDING TO
RECOMMENDATION 9.3 INFORMATION REQUEST**

COMMUNICATIONS

**KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.**

Enclosure 1
Actions and Requested Information Associated with
Recommendation 9.3 for Emergency Preparedness

Communications

Request #2 – Addressees are requested to describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

Actions Taken or Planned

Action	Estimated Completion Date
Purchase/Contract for one (1) portable diesel generator with AC power cables to power temporary lighting and support emergency response and communications functions.	Purchase Order issued 3/29/2012 for delivery between 8/14/2012 and 12/13/12.
Purchase/Contract for five (5) Iridium Satellite Phones, Model 9575 Extreme Satellite Phone (or equivalent) - Emergency Responder Package with Solar Panel to provide communications capability in the event of unavailability of cellular and land-line phones to Operations and the Emergency Response Organization (ERO).	Purchase Order issued 3/29/2012 for delivery between 8/14/2012 and 12/13/12.

ENCLOSURE 2

**ACTIONS AND REQUESTED INFORMATION ASSOCIATED WITH
RECOMMENDATION 9.3 FOR EMERGENCY PREPAREDNESS**

STAFFING

**KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.**

Enclosure 2
Actions and Requested Information Associated with
Recommendation 9.3 for Emergency Preparedness

Staffing

Request #3 – Identify how the augmented staff would be notified given degraded communications capabilities.

Methods for Notification Under Degraded Communications Capabilities:

Assumptions:

1. On-site communications infrastructure remains available.
2. Offsite infrastructure supporting communications systems are inoperable in a 25 mile radius area surrounding the plant site.
3. Communications infrastructure in locations beyond the 25 mile radius area is not significantly impacted by the event.
4. Communications equipment located at an offsite response facility, and supplied from a backup power source, remains available.

Note: Assumptions are consistent with the EP communications assessment being performed as specified in the 60 day response to the March 12, 2012 Information Request.

Method	Description	Estimated Completion Date
Pre-planned Response	A pre-planned response will be developed and personnel will be appropriately instructed to ensure the ERO response following a defined "major event" is consistent with provided expectations. Pursuant to this process, the ERO will report directly to the station or to predetermined staging areas.	12/31/2012
Satellite Phone Activation	Satellite phone will be used to activate the ERO callout process. Once activated, the system initiates pager notification and automatic phone calls to ERO personnel.	12/31/2012
Local Radio Broadcast	This method is a defense-in-depth adjunct to Pre-planned Response. Local radio station Emergency Alert System (EAS) broadcasts will be used to instruct ERO members in the event of a major event or disaster, when normal means of communication are not available. It will be designed to provide information to enable augmented ERO personnel to respond to the event more effectively. ERO members outside the 25-mile zone, or those within the 25-mile zone with car radios or other battery-powered radios, would be able to receive these broadcasts.	12/31/2012

Request #4 – Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

Methods for Site Access Following Large Scale Natural Event:

Method	Description	Estimated Completion Date
Roadway	<p>There are two roadways into the Kewaunee Power Station, both of which intersect with State Highway 42, which runs north and south west of Lake Michigan. At approximate one-mile intervals, county roads intersect State Highway 42, Sandy Bay Road approximately one mile to the north, Nuclear Road less than one-quarter mile to the north and south of these two roadways, and E County Road BB approximately one mile to the south. North-south county roads run parallel to State Highway 42 at approximately one-mile intervals to the west. This network of roads through what is primarily farmland provides multiple access routes to the Kewaunee Power Station.</p> <p>The main access road from State Highway 42 (north of Nuclear Road) diverges into two roads, one of which is normally blocked by vehicle barriers. These barriers can be removed if the primary route is unavailable.</p> <p>The secondary access road from State Highway 42 (south of Nuclear Road) is normally blocked by vehicle barriers which can be removed if the primary route is unavailable.</p> <p>An agreement is in place with the Wisconsin State Police to permit passage of Dominion Energy Kewaunee, Inc. (DEK) personnel if roads are closed, but safe passage is possible.</p>	Agreement is in place.
Air	Access to Kewaunee Power Station can be provided from staging areas via helicopters arranged by DEK or Wisconsin Emergency Management.	Evaluate the need for a specific agreement by 12/31/2012.

Method	Description	Estimated Completion Date
Sea	<p>Kewaunee Power Station can also be accessed from Lake Michigan. DEK will evaluate the use of boats for transport of personnel.</p> <p>Note: This means of transport may not be an option during a severe storm.</p>	Evaluate use of boats by 12/31/2012.

Request #5 – Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

Interim Actions Taken or Planned:

Action	Estimated Completion Date
Develop procedure for ERO notification under degraded communications capabilities (Request #3 above).	12/31/2012
Develop procedure for implementing control of site access following large scale natural event (Request #4 above).	12/31/2012
Develop and implement training for ERO notification under degraded communications capabilities (Request #3 above).	12/31/2012
Develop and implement training for control of site access following large scale natural event (Request #4 above).	12/31/2012
Evaluate the use of boats for transport of personnel.	12/31/2012