



~~Security – Related Information – Withhold Under 10 CFR 2.390~~

October 29, 2012

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

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

**DOMINION ENERGY KEWAUNEE, INC.**  
**KEWAUNEE POWER STATION**  
**RESPONSE TO COMMUNICATIONS ASPECTS OF RECOMMENDATION 9.3 FOR**  
**EMERGENCY PREPAREDNESS PROGRAMS**

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued a letter entitled *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*. Enclosure 5 of that letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness. In response to information requested in Enclosure 5 of the NRC letter, Dominion Energy Kewaunee, Inc. (DEK) submitted a letter dated May 9, 2012, and proposed an alternative course of action for responding to communications aspects of Recommendation 9.3.

Attachment 1 provides DEK's assessment of the communications systems and equipment used during an emergency event for Kewaunee Power Station. Attachment 2 provides the implementation schedule for the results of the communications assessment. Communications equipment upgrades which support implementation of FLEX-related strategies will be implemented in accordance with NRC Order EA-12-049 and the associated Interim Staff Guidance.

DEK requests Attachment 1, which contains Security – Related Information, be withheld from public disclosure in accordance with 10 CFR 2.390(d)(1).

In view of the recent announcement regarding the planned closing of Kewaunee Power Station, DEK will be assessing whether any actions in response to this request for information should be modified and will inform the Commission if any commitments are to be changed.

**ATTACHMENT 1 TO THIS LETTER CONTAINS SECURITY – RELATED INFORMATION AND  
MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF ATTACHMENT 1, THIS  
LETTER IS DECONTROLLED.**

AK45  
nll

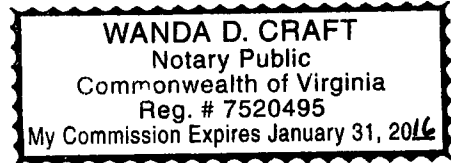
If you have any questions regarding this information, please contact Craig Sly at (804) 273-2784.

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 29<sup>th</sup> day of October, 2012.

My Commission Expires: January 31, 2016

Wanda D. Craft  
Notary Public

Commitments made in this letter: No new regulatory commitments.

Attachments:

1. Recommendation 9.3 Communications Assessment (Security-Related Information)
2. Recommendation 9.3 Implementation Schedule

cc: U.S. Nuclear Regulatory Commission, Region III  
Regional Administrator  
2443 Warrenton Road  
Suite 210  
Lisle, Illinois 60532-4352

K. D. Feintuch  
Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint North, Mail Stop 08 H-4A  
11555 Rockville Pike  
Rockville, MD 20852-2738

NRC Senior Resident Inspector  
Kewaunee Power Station

**ATTACHMENT 2**

**RECOMMENDATION 9.3 IMPLEMENTATION SCHEDULE**

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

### Implementation Schedule

<b>Item</b>	<b>Action</b>	<b>Scheduled Completion</b>
1	Evaluate strategies to allow sufficient time for installation and implementation of sufficient satellite phones and antenna capabilities to support positions and minimum communication links as described in the Kewaunee Emergency Plan.	August 2013
2	Investigate disaster response cellular telephone equipment that offers an easily deployed local cellular network with a range that allows site emergency response organization members to communicate, access to call prioritization and capable of interfacing with the satellite phones (item 1 above).	August 2013
3	Map radio reception in the Kewaunee Power Station plume exposure pathway emergency planning zone, to the State of Wisconsin emergency operations center (EOC), and to the risk-jurisdiction EOCs to determine if radios can function effectively in "point-to-point" mode (i.e., without repeaters in the approximate 25-mile radius).	August 2013
4	Evaluate using battery or generator powered portable emergency radio repeaters to enhance off-site radio communications in the event installed repeaters are rendered unavailable as a result of a large scale external event.	August 2013
5	Evaluate providing backup power supplies for the in-plant radio system antennae and repeaters, including cost planning and scheduling.	August 2013
6	Evaluate alternatives for alerting and informing station workers of actions after a large scale external event (e.g., new or additional battery backup for the existing plant Public Address System (Gai-Tronics), alternative systems).	August 2013
7	Evaluate adding or expanding amateur radio capability.	August 2013
8	Evaluate expanding use of the Government Emergency Telecommunications Service (GETS), the Telecommunication Service priority (TSP) and the Wireless Priority Service (WPS).	August 2013
9	Evaluate whether physical separation between Kewaunee Power Station and the Emergency Operations Facility (EOF, in Green Bay, Wisconsin) is sufficient to provide reasonable assurance of survivability.	August 2013

### **Implementation Schedule**

- |    |   |             |
|----|---|-------------|
| 10 | Evaluate providing satellite data capability on site to leverage use of the EOF and Dominion offices in Glen Allen, Virginia.                               | August 2013 |
| 11 | Evaluate relocating base station for existing low-power cellular telephone system (or evaluate current location for reasonable assurance of survivability). | August 2013 |
| 12 | Evaluate providing back up power for the EOF.   | August 2013 |