

~~**SAFEGUARDS INFORMATION**~~

Serial No. 13-287E  
Docket Nos.:50-305, 72-64

**Attachment 2**

**Environmental Considerations**

**Kewaunee Power Station**

**Dominion Energy Kewaunee, Inc.**

**NOTE: ATTACHMENT 1 TO THIS LETTER CONTAINS SAFEGUARDS INFORMATION AND MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF ATTACHMENT 1, THIS LETTER IS "DECONTROLLED."**

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## ENVIRONMENTAL CONSIDERATIONS

The proposed exemptions meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(25), because the proposed exemption involves: (i) no significant hazards consideration; (ii) no significant change in the types or significant increase in the amounts of any effluent that may be released offsite; (iii) no significant increase in individual or cumulative occupational radiation exposure; (iv) no significant construction impact; (v) no significant increase in the potential for consequences from radiological accidents; and (vi)(F) the requirements from which the exemption is sought involve safeguard plans. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed exemptions.

### (i) No significant hazards consideration

Dominion Energy Kewaunee, Inc. (DEK) has evaluated the proposed exemptions to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92 as discussed below:

#### 1. Do the proposed exemptions involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed exemptions have no effect on the capability of any plant structures, systems, and components (SSCs) to perform its design function such that it would significantly increase the probability or consequences of an accident previously evaluated. The proposed exemptions would not increase the likelihood of a malfunction of any plant SSC. The proposed exemptions would have no effect on any of the previously evaluated accidents in the KPS Updated Safety Analysis Report. The exemptions will not affect the probability of occurrence of any previously analyzed accident.

Therefore, the proposed exemptions do not involve a significant increase in the probability or consequences of an accident previously evaluated.

#### 2. Do the proposed exemptions create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed exemptions do not involve a physical alteration of the plant. No new or different type of equipment will be installed and there are no physical

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modifications to existing equipment associated with the proposed exemptions. Similarly, the proposed exemptions would not physically change any structures, systems, or components involved in the mitigation of any accidents. Thus, no new initiators or precursors of a new or different kind of accident are created. Furthermore, the proposed exemptions do not create the possibility of a new accident as a result of new failure modes associated with any equipment or personnel failures. No changes are being made to parameters within which the plant is normally operated, or in the setpoints which initiate protective or mitigative actions, and no new failure modes are being introduced.

Therefore, the proposed exemptions do not create the possibility of a new or different kind of accident from any previously evaluated.

### **3. Do the proposed exemptions involve a significant reduction in a margin of safety?**

The proposed exemptions do not alter the design basis or any safety limits for the plant. The proposed exemptions do not impact station operation or any plant SSC that is relied upon for accident mitigation.

Therefore, the proposed exemptions do not involve a significant reduction in a margin of safety.

Based on the above, DEK concludes that the proposed exemptions present no significant hazards consideration, and, accordingly, a finding of "no significant hazards consideration" is justified.

### **(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.**

There are no expected changes in the types, characteristics, or quantities of effluents discharged to the environment associated with the proposed exemptions. There are no materials or chemicals introduced into the plant that could affect the characteristics or types of effluents released offsite. In addition, the method of operation of waste processing systems will not be affected by the exemptions. The proposed exemptions will not result in changes to the design basis requirements of SSCs that function to limit or monitor the release of effluents. All the SSCs associated with limiting the release of effluents will continue to be able to perform their functions. Therefore, the proposed

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exemptions will result in no significant change to the types or significant increase in the amounts of any effluents that may be released offsite.

- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.**

The exemptions would result in no expected increases in individual or cumulative occupational radiation exposure on either the workforce or the public. There are no expected changes in normal occupational doses. Likewise, design basis accident dose is not impacted by the proposed exemptions.

- (iv) There is no significant construction impact.**

There are no significant construction activities associated with the proposed exemptions.

- (v) There is no significant increase in the potential for consequences from radiological accidents.**

See the no significant hazards considerations discussion in item (i) above.

- (vi)(F) The requirements from which exemptions are sought involve safeguard plans.**

The purpose of the exemptions is to change the requirements in 10 CFR 73.55 as discussed in Attachment 1.

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