



January 10, 2014

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

Serial No. 13-390B
LIC/JG/R0
Docket No.: 50-305
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
SUPPLEMENTAL RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING REQUEST FOR EXEMPTIONS FROM PORTIONS OF 10 CFR 50.47
AND 10 CFR 50, APPENDIX E

By application dated July 31, 2013 (Reference 1), Dominion Energy Kewaunee, Inc. (DEK) requested exemptions from portions of 10 CFR 50.47(b), 10 CFR 50.47(c)(2), and 10 CFR 50, Appendix E, Section IV, for Kewaunee Power Station (KPS). The requested exemptions would allow DEK to reduce emergency planning requirements and subsequently revise the KPS Emergency Plan consistent with the permanently defueled condition of the station. The application was supplemented on December 11, 2013 (Reference 2).

This letter serves to inform you that additional details regarding spent fuel pool (SFP) inventory makeup strategies, which are discussed in Reference 2, are contained in a DEK request to rescind NRC Order EA-12-049, "Order to Modify Licenses with Regards to Requirements for Mitigation Strategies for Beyond-Design-Basis Events," dated August 23, 2013 (Reference 3). Therefore, please refer to the information provided in Reference 3, as this information also applies to the spent fuel pool inventory makeup strategies discussed in the December 11, 2013 supplement.

Reference 1 provided a qualitative analysis regarding the potential for a zirconium fire in the SFP following permanent shutdown of the reactor. Specifically, Reference 1 stated that following a minimum decay time of 17 months, a zirconium/zircaloy fire as a result of the SFP being completely drained would be precluded at KPS. Seventeen months of decay time corresponds to a date of approximately October 7, 2014 for KPS. In a subsequent submittal to revise the KPS Emergency Plan (Reference 4), DEK provided a confirmatory quantitative analysis of the qualitative analysis in Reference 1. The quantitative analysis in Reference 4 concluded that "the surface temperature of the cladding in the spent fuel pools will not exceed the critical temperature for zirconium following a total loss of water from the pools on or after October 30, 2014." DEK intends to use the more conservative (later) date of the quantitative analysis for implementing any relaxations granted by the Commission.

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Please contact Mr. Jack Gadzala at 920-388-8604 if you have any questions or require additional information.

Very truly yours,



Mark D. Sartain
Vice President – Nuclear Engineering and Development

References:

1. Letter from A. J. Jordan (DEK) to NRC Document Control Desk, "Request for Exemptions from Portions of 10 CFR 50.47 and 10 CFR 50, Appendix E," dated July 31, 2013.
2. Letter from Mark D. Sartain (DEK) to NRC Document Control Desk, "Supplement 1 and Response to Request for Additional Information Regarding Request for Exemptions from Portions of 10 CFR 50.47 and 10 CFR 50, Appendix E," dated December 11, 2013.
3. Letter from Eugene S. Grecheck (DEK) to NRC Document Control Desk, "Request to Rescind Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated August 23, 2013 (ADAMS Accession ML13242A019).
4. Letter from Mark D. Sartain (DEK) to NRC Document Control Desk, "License Amendment Request 257, Permanently Defueled Emergency Plan and Emergency Action Level Scheme," dated December 11, 2013.

Commitments made by this letter: None

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