

Dominion Energy Kewaunee, Inc.
5000 Dominion Boulevard, Glen Allen, VA 23060
Web Address: www.dom.com



January 16, 2014

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

Serial No. 13-495A
LIC/JG/R0
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
LICENSE AMENDMENT REQUEST 257, PERMANENTLY DEFUELED EMERGENCY
PLAN AND EMERGENCY ACTION LEVEL SCHEME

Pursuant to 10 CFR 50.90, Dominion Energy Kewaunee, Inc. (DEK) requested an amendment to Facility Operating License Number DPR-43 for Kewaunee Power Station (KPS) by letter dated December 11, 2013 (Serial Number 13-495). The proposed amendment would revise the emergency plan and emergency action level (EAL) scheme. Due to legibility issues with some of the supporting calculation pages, the original submittal was not able to be docketed by the NRC. Therefore, DEK is hereby resubmitting the original request. For convenience, this new submittal replaces the original submittal in its entirety, and the original submittal is hereby retracted. The proposed changes are being submitted to the NRC for approval prior to implementation, as required under 10 CFR 50.54(q)(4) and 10 CFR 50, Appendix E, Section IV.B.2.

By letter dated May 14, 2013, DEK submitted a certification of permanent removal of fuel from the reactor vessel (Reference 1). Consequently, as specified in 10 CFR 50.82(a)(2), the 10 CFR Part 50 license for KPS no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel. Since KPS is in a permanently defueled condition, the number and severity of potential radiological accidents is significantly less than when the plant was operating. Therefore, DEK is proposing a new EAL scheme and corresponding emergency plan changes to reflect the currently defueled status of the plant.

The proposed emergency plan does not meet all the standards of 10 CFR 50.47(b) and requirements of 10 CFR 50, Appendix E. DEK previously submitted requests for exemptions from the portions of 10 CFR 50.47(b), 10 CFR 50.47(c)(2), and 10 CFR 50, Appendix E, Section IV that the proposed emergency plan does not meet, by letter dated July 31, 2013 (Reference 2). The proposed emergency plan revisions are predicated on approval of the exemption requests.

Attachment 1 to this letter contains a description, technical analysis, significant hazards determination, and environmental considerations evaluation for the proposed amendment. Attachment 2 contains a matrix that compares the proposed EALs to the corresponding information in Nuclear Energy Institute 99-01, "Methodology for Development of Emergency Action Levels," Revision 6, implementation guidance. Enclosures 1, 2, and 3 to this letter provide the proposed KPS Emergency Plan, the

AX45
NRR

proposed EAL scheme, EAL bases document, and supporting calculations, respectively. The supporting calculations in Enclosure 4 are being provided to the Document Control Desk in two forms, hard-copy and electronic copy on a digital video disc. The supporting calculations in Enclosure 4 are being provided to the other recipients of this letter (listed in the "carbon copy" list below) by electronic copy on a digital video disc only.

The KPS Facility Safety Review Committee has reviewed the proposed amendment and a copy of this submittal has been provided to the State of Wisconsin in accordance with 10 CFR 50.91(b).

DEK requests approval of this proposed amendment by October 31, 2014. Once approved, the amendment will be implemented within 60 days.

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

Sincerely,



Mark D. Sartain
Vice President – Nuclear Engineering and Development

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain, who is Vice President – Nuclear Engineering and Development 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 16th day of January, 2014.

My Commission Expires: 12|31|16

Craig D Sly
Notary Public

CRAIG D SLY
Notary Public
Commonwealth of Virginia
Reg. # 7518653
My Commission Expires December 31, 2016

References:

1. Letter from Daniel G. Stoddard (DEK) to NRC Document Control Desk, "Certification of Permanent Removal of Fuel from the Reactor Vessel," dated May 14, 2013. (ADAMS Accession No. ML13135A209)
2. 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.

Attachments:

1. Discussion of Change, Technical Analysis, Significant Hazards Determination and Environmental Considerations
2. Comparison Matrix for Permanently Defueled EALs Based Upon NEI 99-01, "Methodology for Development of Emergency Action Levels," Revision 6

Enclosures:

1. Permanently Defueled Emergency Plan
2. Permanently Defueled Emergency Action Level Scheme
3. Permanently Defueled Emergency Action Level Bases Document
4. Digital Video Disc - Supporting Evaluations and Calculations

Commitments made in this letter: None.

Enclosed with this letter is a digital video disk (DVD) which contains this submittal's Enclosure 4, labeled:

Dominion Energy Kewaunee, Inc.
Kewaunee Power Station
LAR 257: Permanently Defueled Emergency Plan and Emergency Action Level Scheme
Enclosure 4 Supporting Evaluations and Calculations
Serial No. 13-495A
Docket No.: 50-305
License No.: DPR-43

The enclosed DVD contains the following files:

	File Name	Description	File Size	Sensitivity
001	001 Calculation RA-0028 R0	Calculation RA-0028, Kewaunee Fuel Handling Accident Post- Cessation of Operations	782 KB	publicly available
002	002 Calculation RA-0044 R1	Calculation RA-0044, Dose Rate at the KPS Site Boundary Following a Complete Drindown of the Spent Fuel Pool	722 KB	publicly available
003	003 Calculation 2013-07050 R2	Calculation 2013-07050, Maximum Cladding Temperature Analysis for an Uncovered Spent Fuel Pool with No Air Cooling	586 KB	publicly available
004	004 Evaluation ETE-NAF-20130072 R0	Evaluation ETE-NAF-20130072, Kewaunee Spent Fuel Pool Zirconium Fire Parameter Comparison	124 KB	publicly available
005	005 Calculation RA-0049 R1	Calculation RA-0049, Kewaunee Emergency Action Levels for Post- Cessation of Power Operations	1.63 MB	publicly available
006	006 Calculation RA-0050 R0	Calculation RA-0050, Kewaunee Resin Cask Drop Dose Consequence Analysis	210 KB	publicly available
007	007 S&L Calculation 2013-11284 R0	Sargent & Lundy Calculation 2013- 11284, Maximum Cladding and Fuel Temperature Analysis for Uncovered Spent Fuel Pool	15.8 MB	publicly available

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

Mr. W. C. Huffman, Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North, Mail Stop O8-D15
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. Brian Benney, Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North, Mail Stop O8-C1
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. Theodore Smith, Project Manager
U.S. Nuclear Regulatory Commission
Two White Flint North, Mail Stop 8-F5
11545 Rockville Pike
Rockville, MD 20852-2738

Public Service Commission of Wisconsin
Electric Division
P.O. Box 7854
Madison, WI 53707