

NRR-PMDAPEm Resource

From: Huffman, William
Sent: Sunday, April 27, 2014 1:15 PM
To: Jack Gadzala (Generation - 4); Craig Sly (craig.d.sly@dom.com)
Cc: john.r.egdorf@dom.com
Subject: Kewaunee Amendment Request for Emergency Plan Changes MF3411 - Draft RAIs

Mr. Craig Sly,

By letter dated January 16, 2014, (Agency-Wide Documents Access and Management System (ADAMS) Accession Number ML14029A076), Dominion Energy-Kewaunee, Inc. (DEK) requested a license amendment to the Radiological Emergency Response Plan, heretofore identified as the Permanently Defueled Emergency Plan (PDEP), for the Kewaunee Power Station (KPS). DEK requested review and approval of a revision to the KPS PDEP to revise the emergency action level scheme and emergency plan consistent with the KPS permanently shutdown and defueled condition.

The Nuclear Regulatory Commission (NRC) staff has performed a preliminary review of the request and found that some further information is needed to complete the staff's review. The NRC considers that timely responses to requests for additional information (RAIs) help ensure sufficient time is available for the NRC staff review and contribute towards the NRC's goal of efficient and effective use of staff resources. Therefore, the staff is requesting your response by May 29, 2014.

You may request a conference call to discuss the contents of this draft RAI with the NRC staff, including any change to the proposed schedule. Please send me an e-mail if you do not need a conference call to clarify the draft RAI.

Respectfully,

Bill Huffman
Kewaunee Project Manager
NRR/DORL/LPL4-2
U.S. Nuclear Regulatory Commission
(301) 415-2046

REQUEST FOR ADDITIONAL INFORMATION

KEWAUNEE POWER STATION

LICENSE AMENDMENT REQUEST FOR EMERGENCY PLAN CHANGES

DOCKET NUMBER 50-305 (TAC No.: MF3411)

The Office of Nuclear Security and Incident Response (NSIR), Division of Preparedness and Response (DPR), Operating Reactor Licensing and Outreach Branch (ORLOB) reviewed the license amendment request (LAR) using the guidance contained in NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (November 1980), as revised to support an emergency plan for a decommissioning power reactor facility

Based on the staff's initial review of the submittal, the RAIs listed below are necessary to facilitate the staff's technical review.

KPS-RAI-01: Please provide a cross-reference of KPS PDEP sections to the applicable sections of NUREG-0654/FEMA-REP-1.

KPS-RAI-02: Please provide further justification for extending the notification time requirement for emergency declarations to designated offsite response organizations for 15 minutes to 60 minutes.

KPS-RAI-03: Please provide basis for not formatting the KPS PDEP in accordance with NUREG-0654 (i.e., Section A equates to 10 CFR 50.47(b)(1) and applicable portions of 10 CFR 50 Appendix E, and so forth), to ensure consistency in PDEP development throughout the industry.

KPS-RAI-04: The staff noted several placeholders throughout the document where information is to be filled in later. Please address these placeholders and the expected timeframe when they will be completed after determination.

KPS-RAI-05: Please explain for the on-shift staff, whether there has been an evaluation for potential conflicts between their assigned normal and emergency duties to verify that emergency plan functions can be performed as stated. Additionally, who on-shift is assigned to be a member of the fire brigade and has an evaluation been performed to identify any potential conflicts between normal assigned duties and the fire brigade?.

KPS-RAI-06: Please explain the following:

- a. Which on-shift staff is qualified to perform the first aid function and whether this has been evaluated as a potential conflict between their normal and emergency duties?
- b. How NUREG-0654/FEMA-REP-1, Section II Evaluation Criteria L.2 and O.3 are addressed in the KPS PDEP.

KPS-RAI-07: Please address NUREG-0654/FEMA-REP-1, Section II Evaluation Criteria B.5 and H.4 in the KPS PDEP, including when the emergency response organization is required to relieve the on-shift staff of emergency preparedness functions.

KPS-RAI-08: Please address NUREG-0654/FEMA-REP-1, Section II Evaluation Criteria G.3.a and G.4.a in the KPS PDEP.

KPS-RAI-09: Please address NUREG-0654/FEMA-REP-1, Section II Evaluation Criterion J.5, in the KPS PDEP, as it relates to maintaining accountability after it has been initially completed.

KPS-RAI-10: Please address NUREG-0654/FEMA-REP-1, Section II Evaluation Criterion P.1 in the KPS PDEP, as it relates to the training provided to the staff responsible for maintaining an effective emergency plan.

KPS-RAI-11: Please provide a listing of emergency plan implementing procedures as stated in NUREG-0654/FEMA-REP-1, Section II Evaluation Criterion P.7.

KPS-RAI-12: Please address NUREG-0654/FEMA-REP-1, Section II Evaluation Criterion P.9 in the KPS PDEP, as it relates to the independent audit of the emergency preparedness program.

KPS-RAI-13: Please address NUREG-0654/FEMA-REP-1, Section II Evaluation Criteria N.2.d and N.2.e in the KPS PDEP, as it relates to radiation monitoring drills and health physics drills.

KPS-RAI-14: Please provide more detail related to the area radiation monitors (ARMs) discussed in Section 8.3, specific to the following:

- a. Are these ARMs in range for the expected, reduced, radiation levels?
- b. Is the resolution of these ARMs appropriate?

- c. Will these ARMs be maintained after the spent fuel is relocated to the independent spent fuel storage installation (ISFSI)?

KPS-RAI-15: Please address why 10 CFR 50.54(q) is not referenced in Section 9.4 to ensure the PDEP is maintained appropriately.

The following RAIs are related to the proposed emergency action level (EAL) scheme:

KPS-RAI-16a: In several sections of Enclosure 3, “Permanently Defueled Emergency Action Level Basis Document,” statements alluding to removing certain EALs from the approved EAL scheme when all of the spent fuel is removed to the ISFSI is made. Please provide basis for not considering the development, and submittal, of two KPS PDEPs, one to address all of the requirements (including the EAL scheme) for when the spent fuel is in the spent fuel pool, and one to address all of the requirements when all of the spent fuel has been relocated to the ISFSI. This, including a commitment to formally inform the NRC, the State, and the Counties of the transition, may provide a much clearer method of addressing the different EP requirements, as well as providing the staff the opportunity to pre-approve a future EAL scheme change.

KPS-RAI-16b: Please address why reference to 10 CFR 50.54(q) was not added to Section 1.0, “Purpose,” to ensure the EAL Technical Basis Document is maintained appropriately.

KPS-RAI-16c: For EALs PD-AU1 and PD-AA1, please provide evidence that the stated instrumentation is capable of indicating at the stated value(s), including the range and resolution of these instruments.

KPS-RAI-16d: For EAL PD-AU2, please explain where the stated alarms/indications actually occur, e.g., in the Control Room?

KPS-RAI-16e: Please address why the basis language from the endorsed guidance for EAL AA3 was not incorporated into the basis language for PD-AA2, as it more clearly states the intent of the EAL.

KPS-RAI-16f: Please address why language to the definitions of “annual” and “monthly” does not clearly state reasonable periodicity (i.e., annual = calendar year +/- 3 months).

KPS-RAI-17: Mitigative strategies for spent fuel pool cooling have been documented and addressed in several documents for mitigative strategies related to the spent fuel pool. Please provide evidence that these strategies will: (1) continue to be available and controlled in respective KPS procedures, and (2) be maintained in accordance with the requirements of 10 CFR 50.54(q). Note that the details related to spent fuel pool strategies are considered to be Security-Related information and are to be withheld from public disclosure.

KPS-RAI-18: Please explain how the emergency plan and the on-shift staffing will effectively coordinate the response of offsite emergency response organizations to an emergency onsite, including local law enforcement, and fire and emergency services response. This should include communications, plant access, coordination and radiological monitoring as required.

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Options
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