

NRR-PMDAPEm Resource

From: Huffman, William
Sent: Monday, April 07, 2014 7:44 AM
To: Bowman, Eric; Casto, Greg; Jones, Steve; Purdy, Gary; Cervera, Margaret; Anderson, Joseph; Norris, Michael; Wasem, Michael; Gratton, Christopher; Kim, James
Cc: Wastler, Sandra; Broaddus, Doug
Subject: Summary of Kewaunee Mitigation Strategy Phone Call Last Week

Please take a look at the conference call summary for last week's Mitigation Strategy License Condition at Kewaunee.

Any corrections, improvements or requests for clarifications would be appreciated.

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Date: 04/02/2014 Time: 1000 EDT

<u>Participants:</u>	<u>NRC</u>	<u>DEK</u>
Eric Bowman	- Mitigating Strategies, NRR	Jack Gadzala – Decommissioning Licensing
Greg Casto	- BC, Plant Systems, NRR	Rick Repshas – Licensing
Steve Jones	- Plant Systems (SFP), NRR	Ethan Treptow – EP
Gary Purdy	- Material Securities, NSIR	David Lohman – Engineering Projects
Margaret Cervera	- Material Securities, NSIR	Brian Koehler – Engineering (FP)
Joe Anderson	- Branch Chief, EP NSIR	Michael Sortwell – Decommissioning
Mike Norris	- EP, NSIR	Tim Olson – Assistant Plant Manager
Mike Wasem	- EP, NSIR	Jeff Stafford – Director Safety Licensing
Chris Gratton	- NRR PM, Crystal River	Craig Sly – Corp Licensing
Jim Kim	- NRR PM, Vermont Yankee	Margaret Earle – Corp Licensing (Security)
Bill Huffman	- NRR PM, KPS	

Topic: **Mitigating Strategy License Condition Conference Call**

References:

1. License Amendment (and safety evaluation), License Condition 2.C.(10), dated August 2, 2007
2. Permanently Defuel Tech Specs, dated May 29, 2013
3. NRC RAI dated April 1, 2014

Main Points of Discussion:

The NRC staff requested additional information (RAI) from Kewaunee Power Station (KPS) from the NRC regarding a proposal in its Permanently Defuel Tech Specs amendment request to delete License Condition 2.C.(10), Mitigating Strategy License Condition. The RAI requested additional justification for removing each of

the 14 elements in License Condition 2.C.(10); or maintaining the elements in effect. This conference call served to clarify that RAI and provide NRC staff with general information about mitigating strategies at KPS.

The NRC staff discussed its basis for issuing the RAI and provided further background on the statements contained within the RAI. The staff's primary point was that measures needed to maintain public health and safety and common defense and security specifically related to Mitigation Strategies should remain in place while fuel remained in the spent fuel pool (SFP).

Dominion Energy Kewaunee (DEK) staff discussed an alternative approach to the RAI (i.e., maintaining the elements of License Condition 2.C.(10) in effect). DEK premised this discussion on the ability to make changes to the underlying implementing details of License Condition 2.C.(10), as described in the NRC safety evaluation (SE) that issued this license condition. DEK noted that the required strategies for all phases would be covered by the license condition and all implementing details would be managed by NEI 99-04 [commitment management process].

DEK noted that the 34 measures that underlie the 14 elements of the license condition could be changed using the NEI 99-04 commitment management process. As such, this process could be used to eliminate those measures that are no longer needed to reflect the permanently defueled status of the facility (e.g., measures to provide alternative water for core cooling, containment isolation, starting AFW without DC power, etc.).

DEK also discussed a potential change to the introductory sentence for License Condition 2.C.(10) to clarify its applicability as being to the period when spent fuel assemblies are stored in the spent fuel pool; and that its current focus being the threat to the spent fuel pool.

The NRC staff did not note any objections to DEK's proposal. A point was made by the staff that any change to the license condition (other than a complete retraction of the originally proposed change) would necessitate a safety evaluation of that change. Additionally, the staff expressed interest in being kept abreast in a timely manner of commitment changes associated with this license condition. The staff also indicated their desire for DEK to coordinate proposed changes in this area with other decommissioning facilities.

A follow up discussion involved information regarding response capability and strategies for loss of spent fuel pool inventory that was described in the various submittals provided to NRC. This discussion included DEK's description of an external makeup strategy (using the diesel driven portable pump) that had been demonstrated to be capable of being deployed within two hours; and how this strategy related to other response strategies that discussed different time frames.

Actions:

DEK:

- 1) Supplement the Permanently Defuel Tech Specs, dated May 29, 2013, as discussed above.
- 2) Decide whether to change the introductory sentence in the license condition.
- 3) Coordinate the change with other decommissioning facilities.

Hearing Identifier: NRR_PMDA
Email Number: 1334

Mail Envelope Properties (William.Huffman@nrc.gov20140407074400)

Subject: Summary of Kewaunee Mitigation Strategy Phone Call Last Week
Sent Date: 4/7/2014 7:44:29 AM
Received Date: 4/7/2014 7:44:00 AM
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