



~~Safeguards Information~~

October 15, 2015

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

Serial No.: 15-302
NL&OS/MAE: R1
Docket Nos.: 50-305
72-64
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
REQUEST FOR APPROVAL OF THE KEWAUNEE POWER STATION SECURITY PLAN

In accordance with the provisions of 10 CFR 50.4 and 50.90, Dominion Energy Kewaunee, Inc. (DEK) is submitting a request for an amendment to the Operating License (OL) for Kewaunee Power Station. Specifically, this proposed license amendment requests NRC approval of the Kewaunee Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (the Plan) and removal of the Cyber Security requirements from the OL. The Plan will supersede the current Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan at KPS. The Plan addresses the protection of material on site that is licensed by the KPS Operating License. The protection of material subject to the requirements of 10 CFR 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material," is addressed in a separate plan. The future site configuration that is reflected in the Plan assumes that the remaining spent fuel in the spent fuel pool has been moved to the ISFSI and that there is no requirement to return spent fuel to the spent fuel pool ("ISFSI only" status). Spent fuel movement to the ISFSI is currently scheduled to be completed by the end of 2016.

AREVA Inc. (AREVA) is the holder of Certificate of Compliance (CoC) 1004 for the Standardized NUHOMS[®] System, which is used to store spent fuel at the KPS ISFSI. Currently the technical specifications associated with this CoC require that under certain circumstances the cask must be returned to the spent fuel pool for inspection. AREVA submitted an application to revise this CoC on August 24, 2015 to remove this requirement. AREVA has requested approval of the CoC by October 2016. Once the CoC is revised, there will no longer be a requirement to return spent fuel to the spent fuel pool. In addition, in a September 14, 2015 letter (Serial No. 15-185), DEK submitted an OL amendment request that would clarify that spent fuel will not be stored in the spent fuel pool.

An evaluation of the proposed license amendment is provided in Enclosures 1 and 2. The Plan is provided in Enclosure 3. Enclosure 4 contains the assumptions used in developing the Plan. Pursuant to 10 CFR 73.55(r), alternative measures which have been incorporated into the proposed Plan are discussed in Enclosure 5.

Unauthorized Disclosure Of Safeguards Information Will Be
Subject To Civil And Criminal Sanctions

Classified By:
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Organization: Nuc. Protection Services/ DEK
Effective Date: October 1, 2015

NOTE: ENCLOSURE 1 TO THIS LETTER CONTAINS "~~SECURITY RELATED INFORMATION~~" AND ENCLOSURES 3, 4, and 5 TO THIS LETTER CONTAIN "~~SAFEGUARDS INFORMATION~~." THIS INFORMATION MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF THESE ENCLOSURES, THIS LETTER IS "DECONTROLLED."

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