



**~~SAFEGUARDS INFORMATION~~**

October 15, 2015

Re: 10 CFR 2.202  
10 CFR 72.4

Attention: Document Control Desk  
Director, Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
Washington, D.C. 20555-0001

Serial No.: 15-337  
NL&OS/MAE: R8  
Docket No.: 50-305  
72-64

**DOMINION ENERGY KEWAUNEE, INC.**  
**KEWAUNEE POWER STATION**

**REVISED ANSWER TO ORDER FOR ADDITIONAL SECURITY MEASURES (ASMs) AND FINGERPRINTING FOR UNESCORTED ACCESS FOR CERTAIN SPENT FUEL STORAGE LICENSEES DATED JANUARY 28, 2008 AND RELAXATION REQUEST**

On January 28, 2008, the Nuclear Regulatory Commission (NRC) issued an Order (EA-07-195), "Issuance Of Order For Implementation Of Additional Security Measures And Fingerprinting For Unescorted Access For Certain Spent Fuel Storage Licensees - Kewaunee Power Station Independent Spent Fuel Storage Installation," (the Order). The Order modified the license for the proposed Kewaunee Power Station (KPS) Independent Spent Fuel Storage Installation (ISFSI). By letter dated February 15, 2008 (Serial No. 08-0039) Dominion Energy Kewaunee, Inc. (DEK) consented to the Order and provided the response to the additional security measures (ASMs) for the physical protection of the ISFSI in Attachment 1 and the response to the ASMs for access authorization and fingerprinting at the ISFSI in Attachment 2. The response to the Order was based on the ISFSI being located inside an operating power reactor facility's protected area (Section D of the ASMs in Attachment 1 to the Order).

DEK submitted a certification of permanent removal of the fuel from the reactor vessel to the NRC on May 14, 2013 (Serial No. 13-293). Pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 license no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel. Therefore, on October 23, 2013 (Serial No. 13-554), DEK revised the responses to ASMs 1.a, 1.b, 1.c, and 2.c of Section D of Attachment 1 to the Order to reflect the new permanently defueled status of the plant and subsequent security program changes.

As part of the ongoing decommissioning process, DEK intends to move the spent fuel in the spent fuel pool to the ISFSI. The Post-Shutdown Decommissioning Activities Report (PSDAR) for KPS, dated April 25, 2014, documented that DEK expects to have all spent fuel moved to the ISFSI by the end of 2016. This letter revises DEK's answer to the Order to reflect an ISFSI using dry storage that is not collocated with an operating power reactor facility as required by Section B of the ASMs in Attachment 1 to the Order and requests relaxation of Attachment 2 to the Order.

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

Classified By: \_\_\_\_\_  
Name: Jonathan Barbier  
Title: Coord. Nuc. Sec Programs  
Organization: Nuclear Protection Services  
Effective Date: October 1, 2015

ATTACHMENT 1 CONTAINS "~~SAFEGUARDS INFORMATION~~" AND MUST BE PROTECTED ACCORDINGLY. UPON REMOVAL OF ATTACHMENT 1, THIS LETTER IS DECONTROLLED.

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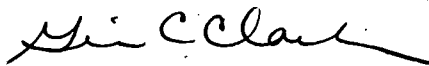
In accordance with Section IV of the Order and 10 CFR 2.202, DEK hereby submits its answer to the Order for an ISFSI using dry storage that is not collocated with an operating power reactor facility. Attachment 1 to this letter provides a response to each of the items stated in Section B of Attachment 1 to the Order and provides an implementation schedule for each item. Attachment 2 to this letter provides a response to the ASMs for access authorization and fingerprinting and provides an implementation schedule. DEK had previously consented to the Order in the February 15, 2008 letter.

The revised Order responses provided in Attachments 1 and 2 to this letter will be effective at the time the Kewaunee Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0 (the Plan) that reflects an "ISFSI only" site configuration is implemented. The Plan was submitted to the NRC for review on October 15, 2015 (Serial No. 15-302).

Attachment 1 to this letter contains Safeguards Information as defined by 10 CFR 73.22 and its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended.

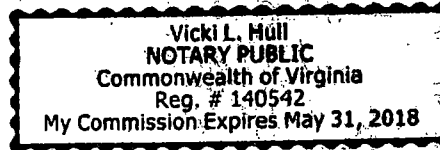
If you have any questions or require additional information, please contact Ms. Margaret Earle at (804) 273-2768.

Sincerely,



Gianna C. Clark  
Vice President – Nuclear Support Services

COMMONWEALTH OF VIRGINIA )  
COUNTY OF HENRICO )



The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Gianna C. Clark who is Vice President - Nuclear Support Services. She has affirmed before me that she 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 her knowledge and belief.

Acknowledged before me this 15<sup>TH</sup> day of October, 2015.

My Commission Expires: 5-31-18

  
Notary Public

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- Attachments: 1. Response to Additional Security Measures (ASMs) for the Physical Protection of Dry Independent Spent Fuel Storage Installations, Section B (Safeguards Information)
2. Response to Additional Security Measures (ASMs) for Access Authorization and Fingerprinting at Independent Spent Fuel Storage Installations and Order Relaxation Request

Commitments made by this letter: See ASMs B.3.a, B.3.f, and B.3.g

cc: Secretary, Office of the Secretary of the Commission (Without Attachments)

U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555-0001  
ATTN: Rulemakings and Adjudications Staff

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Kewaunee Power Station

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