

REQUEST FOR ADDITIONAL INFORMATION  
KEWAUNEE POWER STATION  
LICENSE AMENDMENT REQUEST FOR EMERGENCY PLAN CHANGES  
DOCKET NUMBERS 50-305, 72-64 (TAC No. L53082)

By letter dated September 14, 2015 (Agency-Wide Documents Access and Management System (ADAMS) Accession Number ML15261A238), Dominion Energy Kewaunee, Inc. (DEK) requested a license amendment to the emergency plan and emergency action level (EAL) scheme for the Kewaunee Power Station (KPS) to reflect the transfer of all spent fuel from the spent fuel pool to an Independent Spent Fuel Storage Installation (ISFSI) on the KPS site. DEK is requesting approval of an ISFSI Only Emergency Plan and EAL scheme which would replace the current Permanently Defueled Emergency Plan and Permanently Defueled EAL scheme, following the transfer of all spent fuel to the ISFSI, which is expected to occur by the end of calendar year 2016.

The proposed ISFSI Only Emergency Plan and EAL scheme will continue to rely on previously granted exemptions, issued on October 27, 2014, from certain emergency planning requirements (ADAMS Accession Number ML14261A223) as the basis for these exemptions has not changed and remains in effect. The current Permanently Defueled EAL scheme was approved for use at KPS on October 31, 2014 (ADAMS Accession Number ML14279A482).

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 NSIR/DPR-ISG-02, "Interim Staff Guidance Emergency Planning Exemption Requests For Decommissioning Nuclear Power Plants" (May 2015) and SFST-ISG-16, "Emergency Planning" (June 2000).

Based on the staff's initial review of the submittal, the requests for additional information (RAIs) listed below are necessary to facilitate the staff's further technical review to determine the acceptability of the proposed changes.

KPS-RAI-01

Section 3.0, "Definitions and Acronyms," of the proposed ISFSI-Only Emergency Plan does not have the term "Hostile Force" as is contained in the NRC-approved PDEP. Please provide justification for removal of the definition from the emergency plan, or revise accordingly.

KPS-RAI-02

Section 6.2 of the proposed ISFSI-Only Emergency Plan reflects a single augmented position being the Resource Manager (eliminating the Technical Director and Radiation Protection Director as augmented positions per the PDEP), who will be in contact with the Emergency Director (ED) within 2 hours of event classification. The Resource Manager is to assist the ED by assessing the emergency condition and coordinating required resources, including public information interface. Table 6-1 also lists additional responsibilities, including the Assessment of Condition, and Radiological Accident Assessment and Protective Actions. For a classified event involving radiological consequences (EU1), please explain how radiological monitoring and assessment will be performed in a timely fashion. Consider previous NRC approved precedence of the Zion Nuclear Power Station Defueled Station Emergency Plan, which maintains the minimum augmentation of the Radiation Protection Director within four hours for this type of event.

### KPS-RAI-03

Section 6.1, "On-shift Positions," of the proposed ISFSI-Only Emergency Plan does not have the list of other responsibilities of the Emergency Director, as is contained in the NRC-approved Permanently Defueled Emergency Plan. The proposed plan references Table 6-1, "Emergency Response Organization Staffing and Responsibility," as providing this information. However, Table 6-1 provides a listing of functional areas and not specific responsibilities. Please justify the omission of this information contained in the NRC-approved Permanently Defueled Emergency Plan, or revise accordingly.

### KPS-RAI-04

Section 16.0, "Medical and Health Support," of the NRC-approved Permanently Defueled Emergency Plan provides the following information that is not included in the proposed ISFSI-Only Emergency Plan:

When personnel are transported to the Aurora Medical Center while in a contaminated condition, personnel trained in radiological monitoring will be dispatched to monitor and maintain radiological controls.

Please justify the omission of this information contained in the NRC-approved Permanently Defueled Emergency Plan, or revise accordingly, based on Planning Standard 10 CFR 50.47(b)(12) which was not exempted.