

Dominion Energy Kewaunee, Inc.  
5000 Dominion Boulevard, Glen Allen, VA 23060  
Web Address: www.dom.com



November 16, 2016

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

Serial No.: 15-302C  
NRA/MAE: R0  
Docket Nos.: 50-305  
72-64  
License No.: DPR-43

**DOMINION ENERGY KEWAUNEE, INC.**  
**KEWAUNEE POWER STATION**  
**RESUBMITTAL OF ENCLOSURE 2**  
**REQUEST FOR APPROVAL OF THE KEWAUNEE POWER STATION SECURITY PLAN**

Dominion Energy Kewaunee, Inc. (DEK) submitted a request for an amendment to the Operating License (OL) for Kewaunee Power Station on October 15, 2015 (Serial No. 15-302). Specifically, this proposed license amendment requested 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 NRC staff has requested that Enclosure 2 to this license amendment request be resubmitted. Enclosure 2 is provided as an attachment to this letter. There have been no changes to the material provided in Enclosure 2 since it was submitted on October 15, 2015. It continues to be uncontrolled.

If you have any questions regarding this submittal, please contact Ms. Margaret A. Earle at (804) 273-2768.

Sincerely,

Mark D. Sartain  
Vice President Nuclear Engineering

COMMONWEALTH OF VIRGINIA )  
 )  
COUNTY OF HENRICO )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain who is Vice President Nuclear Engineering of Dominion Energy Kewaunee, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of the Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 16<sup>th</sup> day of November, 2016.

My Commission Expires: January 31, 2020

**WANDA D. CRAFT**  
Notary Public  
Commonwealth of Virginia  
Reg. # 7520495  
My Commission Expires January 31, 2020

Wanda D. Craft  
Notary Public

Attachment: Enclosure 2 to the October 15, 2015 Dominion Energy Kewaunee License Amendment Request (Serial No. 15-302) (Uncontrolled)

SDDIA  
NMS526  
NRR  
NMS5

cc: U. S. Nuclear Regulatory Commission  
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Regional Administrator  
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NRC Regional Inspector  
Kewaunee Power Station

Attachment

Enclosure 2 to October 15, 2015 License Amendment Request

Kewaunee Power Station  
Dominion Energy Kewaunee, Inc.

**Enclosure 2**

**Uncontrolled Sections**

**Evaluation of Proposed Changes**

**Request for Approval of the Kewaunee Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan and Removal of the Cyber Security License Condition**

- 1.0 Regulatory Evaluation
  - 1.1 Applicable Regulatory Requirements/Criteria
  - 1.2 Significant Hazards Consideration
- 2.0 Environmental Consideration

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**ATTACHMENT**

- Proposed Operating License Changes (Mark-Ups)
- Proposed Operating License Changes (Re-Typed)

**Kewaunee Power Station  
Dominion Energy Kewaunee, Inc.**

~~NOTE: ENCLOSURE 1 TO THIS LETTER CONTAINS "SECURITY RELATED INFORMATION" AND ENCLOSURES 3, 4, and 6 TO THIS LETTER CONTAIN "SAFEGUARDS INFORMATION." THIS INFORMATION MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF THESE ENCLOSURES, ENCLOSURE 2 IS "DECONTROLLED."~~

## **1.0 REGULATORY EVALUATION**

### **1.1 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA**

In accordance with the provisions of 10 CFR 50.4 and 50.90, Dominion Energy Kewaunee, Inc. (DEK) is requesting an amendment to Kewaunee Power Station (KPS) Operating License (OL) Physical Protection License Condition 2.C.(4). The proposed amendment requests approval of a new Kewaunee Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (the Plan). The proposed amendment also requests removal of the requirement for the Cyber Security Plan (CSP) in KPS License Condition 2.C.(4).

### **1.2 SIGNIFICANT HAZARDS CONSIDERATION**

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 Plan reflects the configuration of KPS after all the spent nuclear fuel is stored at the ISFSI. The 10 CFR Part 50 license for KPS no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel. DEK has evaluated the proposed amendment to determine if a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

- 1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The irradiated fuel at KPS is currently stored in the spent fuel pool (SFP) and at the Independent Spent Fuel Storage Installation (ISFSI). In this condition, the number of credible accidents/transients is significantly smaller than for a plant authorized to operate the reactor or emplace or retain fuel in the reactor vessel. Accidents/transients that are no longer applicable in a permanently defueled condition have been deleted from the KPS Updated Safety Analysis Report (USAR) Chapter 14. The remaining USAR Chapter 14 accident is the Fuel Handling Accident (FHA). However, as previously discussed, the Plan reflects the future site configuration where all the remaining spent fuel in the SFP has been moved to the ISFSI and there are no requirements to return spent fuel to the SFP. The FHA will no longer be credible after all fuel has been removed from the spent fuel pool.

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The proposed amendment has no effect on plant systems, structures, and components (SSCs) and no effect on the capability of any plant SSC to perform its design function. The proposed amendment would not increase the likelihood of the malfunction of any plant SSC. Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of a previously evaluated accident.

**2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.**

The proposed amendment does not involve significant physical alteration of the plant. Minor modifications are associated with this proposed amendment (e.g., wiring changes in security equipment, the addition of telecommunications equipment, and software changes to the security computer system.) The proposed license amendment would not physically change any SSCs involved in the mitigation of any postulated accident. Thus, no new initiators or precursors of a new or different kind of accident are created. Furthermore, the proposed amendment does not create the possibility of a new failure mode associated with any equipment or personnel failures. The credible events for the ISFSI remain unchanged.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

**3. The proposed change does not involve a significant reduction in a margin of safety.**

Because the 10 CFR Part 50 license for KPS no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel, as specified in 10 CFR 50.82(a)(2), the occurrence of postulated accidents associated with reactor operation is no longer credible. With all spent fuel transferred from the SFP to the ISFSI, a fuel handling accident is no longer credible. The proposed amendment does not involve a change in the plant's design, configuration, or operation. The modifications associated with this proposed amendment (e.g., wiring changes in security equipment, the addition of telecommunications equipment, and software changes to the security computer system) would not affect either the way in which the plant SSCs perform their safety functions or their design margins.

Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

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Based on the above, DEK concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of “no significant hazards consideration” is justified.

### **1.0 ENVIRONMENTAL CONSIDERATION**

DEK has evaluated this proposed license amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. DEK has determined that this proposed license amendment meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(12). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50 and relates solely to safeguards matters (i.e., protection against sabotage or loss or diversion of special nuclear material). In addition, this proposed license amendment involves the approval of a safeguards plan submitted in accordance with 10 CFR 72, and does not involve any significant construction impacts. Minor modifications are associated with this proposed license amendment (e.g., wiring changes in security equipment, the addition of telecommunications equipment, and software changes to the security computer system.)

Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

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**Attachment**

Proposed Operating License Changes (Mark-Ups)  
Proposed Operating License Changes (Re-Typed)

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- (4) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form for sample analysis or instrument calibration or associated with radioactive apparatus or components;
- (5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter 1: (1) Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and (2) is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and (3) is subject to the additional conditions specified or incorporated below:

(1) Deleted

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 215, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

(3) Deleted

(4) Physical Protection

10 CFR 72.212(b)(9)

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21 is entitled: "Nuclear Management Company Kewaunee Nuclear Power Plant Physical Security Plan (Revision 0)" submitted by letter dated October 18, 2004, and supplemented by letter dated October 21, 2004, July 26, 2005, and May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 210.

(5) Deleted

"Kewaunee Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (Revision 0)" approved on

- (4) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form for sample analysis or instrument calibration or associated with radioactive apparatus or components;
  - (5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter 1: (1) Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and (2) is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and (3) is subject to the additional conditions specified or incorporated below:
- (1) Deleted
  - (2) Technical Specifications  
The Technical Specifications contained in Appendix A, as revised through Amendment No. , are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.
  - (3) Deleted
  - (4) Physical Protection  
The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to 10 CFR 72.212(b)(9) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21 is entitled: "Kewaunee Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, (Revision 0)", approved on
  - (5) Deleted