

May 3, 2018



Attention: Document Control Desk
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Serial No.: 18-146
NRA/MLW: R3
Docket Nos.: 50-305
72-64
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
CLARIFICATION OF NRC SAFETY EVALUATION

On October 15, 2015, Dominion Energy Kewaunee, Inc. (DEK) submitted two letters related to the Kewaunee Power Station (KPS) transition from a facility with spent fuel in the spent fuel pool to a facility with all spent fuel located in an Independent Spent Fuel Storage Installation (ISFSI). The first letter (SN 15-302), requested NRC approval of changes to the Kewaunee Power Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (the Plan) in accordance with 10 CFR 50.90. The second letter (SN 15-337) revised DEK's response to Order EA-07-195 (the Order) and requested relaxation of Attachment 2 of the Order. On October 27, 2015, DEK submitted a letter (SN 15-302A) providing supporting information for the October 15, 2015 submittals. The supporting information contained a Local Law Enforcement Agency Memorandum of Understanding (MOU). The MOU reflected the proposed future configuration of KPS as an ISFSI-only facility and was submitted to support the proposed relaxation of the Order. The purpose of this letter is to clarify the current facility configuration with respect to the MOU.

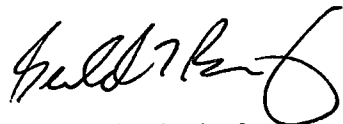
On January 11, 2016, the NRC staff requested that DEK submit the current MOU from the local law enforcement agency. In a letter dated January 13, 2016 (SN 15-337A), DEK responded to the RAI. At that time the current MOU was based on KPS having fuel in the spent fuel pool.

In a May 9, 2017 letter, the NRC approved the license amendment request and issued Amendment No. 219 to KPS Facility Operating License. The letter also provided a Safety Evaluation (SE) that discussed the basis for the approval. DEK has reviewed the amendment and associated SE and identified a minor clarification. Specifically, the SE references information from the MOU provided January 13, 2016. This MOU reflected a site configuration with fuel in the spent fuel pool. The MOU submitted in the October 27, 2015 letter became effective concurrent with the implementation of Amendment 219 and supports KPS's current ISFSI-only status. Both MOUs contain LLEA response times that meet the requirements of the Order.

NM5520
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If you have any questions regarding this submittal, please contact Michael Whitlock at (804) 273-3123.

Sincerely,



Gerald T. Bischof
Senior Vice President – Nuclear Operations & Fleet Performance

Commitments made in this letter: None

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