

June 13, 2022

ES-2022-012

Director, Office of Nuclear Material Safety and Safeguards  
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Subject: Notification of Nuclear Insurance  
Pursuant to 10 CFR 140.11(a)(4) and 10 CFR 50.54(w)

Kewaunee Power Station  
NRC License No. DPR-43  
NRC Docket Nos. 50-305 and 72-64  
NRA/CDS: R0

The U.S. Nuclear Regulatory Commission (NRC) approved the transfer of License No. DPR-43 for the Kewaunee Power Station (KPS) by Order dated March 31, 2022 (the Order). Closing of the transfer is expected to occur on or about June 30, 2022. The Order specified the following condition:

At least two business days before the planned closing date of the purchase transaction, EnergySolutions shall provide the Director of NMSS satisfactory documentary evidence that the appropriate amount of insurance required of a licensee under 10 CFR 140.11(a)(4) and 10 CFR 50.54(w) has been obtained.

EnergySolutions hereby encloses confirmation that American Nuclear Insurers will write nuclear liability insurance for KPS, including amending the facility form policy and master worker certificate for KPS, upon transfer of the KPS license to Kewaunee Solutions, Inc. Additionally, EnergySolutions encloses confirmation that Nuclear Electric Insurance Limited will write a Nuclear Liability and Decontamination Policy for Kewaunee Solutions, Inc. These letters constitute the required evidence of insurance pursuant to the above condition.

Should you have any questions or require additional information, please contact Joseph R. Lynch, Licensing Manager, EnergySolutions/Kewaunee Solutions (KS) at 508-728-1421.

M001  
NMSS26  
NMSS  
NRR

EnergySolutions

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Sincerely,

Joseph R. Lynch  Digitally signed by Joseph R. Lynch  
Date: 2022.06.13 15:27:48 -04'00'

Joseph R. Lynch  
EnergySolutions, LLC/Kewaunee Solutions (KS)  
Licensing Manager

Attachment: As Stated

cc: w/ Attachment

Mr. Karl Sturzebecher  
NRC Project Manager- Kewaunee Power Station  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

NRC Region III Administrator  
U.S. Nuclear Regulatory Commission  
2443 Warrenville Road, Suite 210  
Lisle, Illinois 60532-4352

Mr. Jeff Kitsembel  
Division of Energy Regulation & Analysis  
Public Service Commission of Wisconsin  
P.O. Box 7854  
Madison, WI 53707-7854

Robert Busch, Jr.  
Radiation Protection Section  
Bureau of Environmental and Occupational Health Division of Public Health  
Wisconsin Department of Health Services  
P.O. Box 2659  
Madison, WI 53701-2659

Daniel G. Stoddard  
President and Chief Nuclear Officer  
Dominion Energy Kewaunee, Inc.

**Attachment**

**Confirmation of Nuclear Insurance**

Nuclear Electric Insurance Limited (NEIL) – 1 Page

American Nuclear Insurers – 2 Pages



Nuclear Electric Insurance Limited  
1201 N Market St  
Suite 1200  
Wilmington, DE 19801  
USA

*office + 302 888 3000 fax + 302 888 3007*

April 1, 2022

ATTN: Document Control Desk  
Director, Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re.: Dominion Energy Kewaunee, Inc. – License Transfer to Kewaunee Solutions, Inc.

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Nuclear Liability and Decontamination Policy for Kewaunee Solutions, Inc. as the 100% owner of the Kewaunee Nuclear Power Plant, subject to the payment of premium. A Nuclear Liability and Decontamination Policy will be effective upon close of the transfer of the facility license from Dominion Energy Kewaunee, Inc.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$50 million for this site.

This commitment to write a Nuclear Liability and Decontamination Policy for Kewaunee Solutions, Inc. for a twelve-month policy period remains valid through July 1, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", with a long horizontal flourish extending to the right.

Scott Lauchlan  
Director – Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)  
Jon Levis (NEIL)  
Robert Curtis (NEIL)  
Ken Manne (NEIL)  
Peter Cavanaugh (NEIL)



Jason Martinez, CPCU, ARM, ARe  
Director, Underwriting

June 1, 2022

Attn: Document Control Desk  
Director, Office of Nuclear Regulatory Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

***Re: Kewaunee Solutions, Inc. - NRC Operating License Transfer for the Kewaunee Nuclear Power Plant Letter of Insurability***

To Whom It May Concern,

This letter confirms that American Nuclear Insurers will write nuclear liability insurance for the Kewaunee Nuclear Power Plant, located in the town of Carlton, Kewaunee County, WI, upon the transfer of the NRC operating license from Dominion Energy Kewaunee, Inc. to Kewaunee Solutions, Inc.

Effective as of the transaction close date, which is expected to be on or before July 1, 2022, ANI will amend the below policy and certificates for the Kewaunee Nuclear Power Plant as follows:

- a. **Facility Form Policy No. NF -0204:** ANI will amend the named insured to "Kewaunee Solutions, Inc." in lieu of "Dominion Energy Kewaunee, Inc.". ANI will also amend the operator of the facility to "Kewaunee Solutions, Inc." in lieu of "Dominion Energy Kewaunee, Inc.".
- b. **Master Worker Certificate No. NW -0586:** ANI will amend the named insureds to "Kewaunee Solutions, Inc." in lieu of "Dominion Energy Kewaunee, Inc.". ANI will also amend the operator of the facility to "Kewaunee Solutions, Inc." in lieu of "Dominion Energy Kewaunee, Inc.".

The commitment to write insurance for Kewaunee Nuclear Power Plant remains valid through July 15, 2022. In the event the license transfer occurs after this date, ANI will review the existing circumstances prior to reinstating our commitment to provide insurance.

Please feel free to contact me with any questions or concerns.

Attn: Document Control  
June 1, 2022  
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Yours sincerely,

A handwritten signature in black ink, appearing to read 'JM', with a long horizontal stroke extending to the right.

Jason Martinez, CPCU, ARM, ARe  
Director, Underwriting

C: EnergySolutions – Russ Workman & Greg Wood  
Marsh – Kate Fowler, Tyler Susa & David Wilkins  
Dominion – Gregg Crenshaw & Christopher Patterson