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

Serial No. 07-0436
KPS/LIC/JG: R0
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
STATION BLACKOUT RESPONSE CORRECTION

In reference 1, Wisconsin Public Service Corporation, then licensee for Kewaunee Power Station (KPS), submitted an alternate design for meeting the requirements of the Station Blackout (SBO) Rule (10 CFR 50.63). This alternate design involved use of the Technical Support Center (TSC) diesel generator (DG) as the alternate AC source. The Nuclear Regulatory Commission (NRC) accepted the alternate design as documented in reference 2.

During investigation of an issue regarding quality assurance (QA) requirements of components for the TSC DG, Dominion Energy Kewaunee (DEK) discovered that the QA controls under which the TSC diesel was initially installed were different than stated in reference 1. This letter provides the corrected information and the DEK analysis of this condition.

The analysis, provided in attachment 1, concludes that the TSC diesel is functional and in compliance with the SBO Rule. However, the TSC DG did not match its QA type description in the KPS Updated Safety Analysis Report. Resolution of this nonconforming condition is being addressed through the KPS corrective action process. An updated description of the SBO alternate AC source, including its QA typing requirements, will be incorporated into the KPS Updated Final Safety Analysis Report.

If you have questions or require additional information, please feel free to contact Mr. Jack Gadzala at 920-388-8604.

Very truly yours,

A handwritten signature in black ink, appearing to read "L. N. Hartz", with a small "for" written below the first part of the signature.

L. N. Hartz
Site Vice President, Kewaunee Power Station

A001
NRP

References:

1. Letter from C. A. Schrock (Wisconsin Public Service Corporation) to Document Control Desk (NRC), "Station Blackout Response," dated September 18, 1992.
2. Letter from A. G. Hansen (NRC) to C. A. Schrock (Wisconsin Public Service Corporation), "Kewaunee Nuclear Power Plant, Unit No. 1-Station Blackout Rule (10CFR 50.63) (TAC No. M84521)," dated November 19, 1992.

Attachment:

1. Station Blackout Response Correction

Commitment made by this letter:

An updated description of the SBO alternate AC source, including the quality assurance program requirements for the TSC DG as defined in the Dominion Nuclear Facility Quality Assurance Program Description, will be incorporated into the KPS Updated Safety Analysis Report and provided to the NRC in accordance with 10 CFR 50.71(e).

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

Ms. M. H. Chernoff
Project Manager
U. S. Nuclear Regulatory Commission
Mail Stop O-8G9A
Washington, D. C. 20555

NRC Resident Inspector
Kewaunee Power Station

ATTACHMENT 1

STATION BLACKOUT RESPONSE CORRECTION

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

STATION BLACKOUT RESPONSE CORRECTION

Background

Reference 1 provided a submittal to the Nuclear Regulatory Commission (NRC) regarding an alternate approach for implementation of the station blackout (SBO) rule (10 CFR 50.63) at Kewaunee Power Station (KPS). The proposed alternate approach was to use the Technical Support Center Diesel Generator (TSC DG) as the alternate AC power source to meet the rule. The TSC DG was installed prior to existence of and independent of the SBO rule. The submittal stated, in part:

The TSC diesel generator and associated equipment were originally installed in accordance with the KNPP QA program as QA type 2.

However, a recent review of the design modification package and associated purchase order specification identified that the equipment was purchased and installed as QA type 3 (QA3).

The SBO rule was implemented at KPS in 1993 under Design Change Request (DCR) 2425. KPS initially intended to purchase and install a pair of diesel generators to meet the rule. Upon evaluation, DCR 2425 was revised (Revision 1) to purchase and install a stand-alone diesel generator. The revised DCR stated that all new equipment for this design change would be classified QA2, except for the interfaces with the QA1 portions of the plant. However, DCR 2425 was further revised (Revision 2) to utilize the pre-existing TSC DG as the alternate AC power source to meet the rule.

The NRC safety evaluation report (SER) accepting the SBO design (reference 2), relied on the QA typing information in reference 1 above. The SER stated the following in the section discussing quality assurance.

The licensee's revised submittal states that the plant's QA type 2 classification is consistent with the requirements of RG 1.155, Section 3.5. The TSC diesel generator and associated equipment was originally installed in accordance with the QA type 2 program.

Subsequently, KPS USAR Section 8.2.4, "Station Blackout," was added to describe compliance with the SBO rule. KPS USAR Section 8.2.4.12, "Quality Assurance and Technical Specifications," currently states:

The QA Type 2 classification is consistent with the requirements of RG 1.155, Section 3.5.

Since the KPS TSC DG was purchased and installed as QA type 3, it did not match the above description in the KPS Updated Safety Analysis Report.

QA Program Guidance for Meeting 10 CFR 50.63

NRC Regulatory Guide (RG) 1.155, Section 3.5 (August 1988) provides quality assurance and specification guidance for SBO equipment that is non-safety related. Section 3.5 states in part:

The guidance on QA and specifications incorporates a lesser degree of stringency by eliminating requirements for involvement of parties outside of the normal line organization. NRC inspections will focus on the implementation and effectiveness of the quality controls described in Appendices A and B.

RG 1.155, Appendix A, "Quality Assurance Guidance for Non-safety Systems and Equipment," provides an outline of an acceptable QA program for non-safety related equipment used for meeting the SBO rule and not already covered by existing QA requirements. This guidance states that activities should be implemented from this section, as appropriate, depending on whether the equipment is being added (new) or is existing.

A QA program review was performed by Dominion Energy Kewaunee (DEK) to determine whether the current QA program for the TSC DG meets the guidance contained in RG 1.155, Appendix A. Based on this review, DEK determined that the appropriate quality assurance guidance was satisfied. Although the TSC DG was purchased and installed as QA type 3, QA program requirements consistent with RG 1.155 had been imposed on this system following implementation of the SBO rule to ensure a high level of confidence in the quality and reliability beyond that used for non-safety related items that do not have specified quality requirements (e.g., material control and accountability, testing, design control, field quality control, and audits).

The current DEK QA Program is contained in Dominion Nuclear Facility Quality Assurance Program Description – Topical Report DOM-QA-1, Revision 1. DOM-QA-1 lists the SBO program as subject to portions of the QA program. The TSC DG is currently maintained to applicable portions of the QA program in accordance with DOM-QA-1.

Conclusion

Although the TSC DG was purchased and installed as QA type 3 and, as such, was nonconforming to the KPS USAR, the QA type 3 purchasing and installation controls that had been applied met the guidance contained in RG 1.155. The TSC DG has been maintained in accordance with station QA requirements for SBO equipment and continues to meet the guidance contained in RG 1.155, Section 3.5 and Appendix A. Therefore, the inaccurate information provided in reference 1 did not impact the functionality of the TSC DG. DEK will continue to maintain the TSC DG in accordance with DEK QA program requirements.

Corrected Requirements

An updated description of the SBO alternate AC source, including the requirement for maintaining the TSC DG to applicable portions of the QA program in accordance with the Dominion Nuclear Facility Quality Assurance Program Description, will be incorporated into the KPS Updated Safety Analysis Report and provided to the NRC in accordance with 10 CFR 50.71(e).

References:

1. Letter from C. A. Schrock (Wisconsin Public Service Corporation) to Document Control Desk (NRC), "Station Blackout Response," dated September 18, 1992.
2. Letter from A. G. Hansen (NRC) to C. A. Schrock (Wisconsin Public Service Corporation), "Kewaunee Nuclear Power Plant, Unit No. 1 - Station Blackout Rule (10CFR 50.63) (TAC No. M84521)" dated November 19, 1992.