



August 30, 2011

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

Serial No. 11-025A
LIC/CDS/R0
Docket No.: 50-305
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
LICENSE AMENDMENT REQUEST 244: PROPOSED REVISION TO
RADIOLOGICAL ACCIDENT ANALYSIS AND CONTROL ROOM ENVELOPE
HABITABILITY TECHNICAL SPECIFICATIONS

By letter dated July 25, 2011 (ML11222A123), Dominion Energy Kewaunee, Inc. (DEK) requested an amendment to Facility Operating License Number DPR-43 for Kewaunee Power Station (KPS). This proposed amendment would revise the KPS Operating License by modifying the Technical Specifications (TS) and the current licensing basis (CLB) to incorporate changes to the current radiological accident analysis (RAA) of record. This proposed amendment would revise the current RAA for the design-basis accidents (DBAs) described in Chapter 14 of the KPS Updated Safety Analysis Report (USAR).

This amendment would also fulfill a commitment made to the NRC in response to Generic Letter 2003-01, "Control Room Habitability" (references 1 and 2). The commitment stated that DEK would submit proposed changes to the KPS TS based on the final approved version of TSTF-448, "Control Room Habitability."

The purpose of this letter is to re-submit the amendment request. The originally submitted amendment request contained Attachment 2, "Marked-up Operating License and Technical Specification Pages." Due to an apparent printing error, some of the markups in the originally submitted Attachment 2 are not visible.

The remainder of this submittal is an unchanged version of what DEK submitted in its letter dated July 25, 2011. This submittal replaces the submittal dated July 25, 2011 in its entirety.

Enclosed is a compact disc (CD) containing this letter's Attachments and Enclosure. Attachment 1 contains a description, safety evaluation, significant hazards consideration determination, and environmental considerations analysis for the proposed changes. Attachment 2 contains marked-up Technical Specification pages. Attachment 3 contains marked-up Technical Specification Bases pages for information. Attachment 4 contains the revised RAA. Attachment 5 contains an evaluation of two new manual actions credited in the revised RAA. Enclosure 1 contains the meteorological data

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ref
Designate as original
Karl Feintuch PM
9/2/2011

Ginger L Rutherford
Notary Public

Attachments:

1. Discussion of Change, Safety Evaluation, Significant Hazards Determination, and Environmental Considerations
2. Marked-Up Operating License and Technical Specifications Pages
3. Marked-Up Technical Specifications Bases Pages
4. Radiological Accident Analysis and Discussion of Associated Technical Specification Changes
5. Evaluation of New Proposed Manual Actions

Enclosure:

1. Data Files: Kewaunee Power Station, Meteorological Data, 2002 – 2006, X/Q Calculation Support

Enclosed with this letter is a compact disk (CD) which contains this submittal's Attachments and Enclosure, labeled:

Dominion Energy Kewaunee, Inc.
Kewaunee Power Station
License Amendment Request 244
Proposed Revision to Radiological Accident Analysis and Control Room Envelope Habitability
Technical Specifications
Serial No. 11-025A
Docket No.: 50-305
License No.: DPR-43
August 30, 2011

The enclosed CD contains the following files: (Please note that files 007-013 and the file folder containing ARCON96 RSF & LOG Files below are Data Files for use by the NRC staff in reviewing this amendment request).

	File Name	Description	File Size	Sensitivity
001	Attachment 1.pdf	Discussion of Change, Safety Evaluation, Significant Hazards Determination, and Environmental Considerations	175 KB	publicly available
002	Attachment 2.pdf	Marked-Up Operating License and Tech Spec Pages	85 KB	publicly available
003	Attachment 3.pdf	Marked-Up Tech Spec Bases Pages	184 KB	publicly available
004	Attachment 4.pdf	Radiological Accident Analysis and Discussion of Associated Technical Specification Changes	800 KB	publicly available
005	Attachment 5.pdf	Evaluation of New Proposed Manual Actions	79 KB	publicly available

	File Name	Description	File Size	Sensitivity
006	Enclosure 1.pdf	Description of Data Files; Met. Data File Structure, and ARCON 96 RSF and LOG Files	92 KB	publicly available
007	BaseMetData.txt	2002-2006 Base Met Data	3,510 KB	publicly available
008	PAVANDInputs.txt	PAVAND Input Files	8 KB	publicly available
009	PAVANDInputs.pdf	PAVAND Inputs (description/explanation)	175 KB	publicly available
010	PAVANDMetData.pdf	2002-2006 Met Data Joint Frequency Distribution PAVAND Input	114 KB	publicly available
011	PAVANDOutput.pdf	PAVAND Output File	287 KB	publicly available
012	PAVANDOutput.txt	PAVAND Output File	473 KB	publicly available
013	ARCON96Data.txt	2002-2006 Met Data	1,584 KB	publicly available
014	File Folder	ARCON96 RSF & LOG Files	180 KB	publicly available

References:

1. Generic Letter 2003-01, "Control Room Habitability," dated June 12, 2003. [ADAMS Accession No. ML031620248]
2. Letter from Craig W. Lambert (NMC) to Document Control Desk (NRC), "Generic Letter 2003-01: Control Room Habitability – Supplemental Response," dated April 1, 2005. [ADAMS Accession No. ML050970303]

Commitments made by this letter:

1. The following guidelines will be included in the assessment of systems removed from service during movement of recently irradiated fuel:
 - a. During fuel handling of recently irradiated fuel, ventilation system and radiation monitor availability (as defined in NUMARC 91-06) will be assessed, with respect to filtration and monitoring of releases from the fuel. Following shutdown, radioactivity in the fuel decays away fairly rapidly. The basis of the Technical Specification operability amendment is the reduction in doses due to such decay. The goal of maintaining ventilation system and radiation monitor availability is to reduce doses even further below that provided by the natural decay.
 - b. A single normal or contingency method to promptly close primary or secondary containment penetrations will be developed. Such prompt methods need not completely block the penetration or be capable of resisting pressure.

The purpose of the "prompt methods" mentioned above is to enable ventilation systems to draw the release from a postulated fuel handling accident in the proper direction such that it can be treated and monitored.

2. DEK will provide the necessary administrative controls to ensure that in the event of a fuel handling accident inside containment, any open containment penetration flow paths can and will be promptly closed (within 30 minutes). However, if it is determined that closure of any containment penetrations would represent a significant radiological hazard to the personnel involved; the decision may be made to forgo the closure of the affected penetration(s).
3. DEK will provide the necessary administrative procedures to ensure that in the event of a fuel handling accident inside containment, an open equipment hatch can and will be promptly closed following containment evacuation (within 45 minutes). However, if it is determined that closure of the containment hatch would represent a significant radiological hazard to the personnel involved; the decision may be made to forgo the closure of the containment hatch.
4. DEK will relocate the current technical specification requirements related to Radiation Monitor R-23 to the KPS Technical Requirements Manual as part of the implementation of this amendment.

The carbon copy (cc:) recipients of this letter will receive a compact disk (CD) which contains this submittal's Attachments and Enclosure.

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