

NRR-PMDAPEm Resource

From: Huffman, William
Sent: Thursday, March 06, 2014 8:48 AM
To: Jack Gadzala (Generation - 4)
Cc: Gratton, Christopher; Broadus, Doug; Bucholtz, Kristy
Subject: Draft RAI On Kewaunee Permanently Defueled Technical Specifications

**DRAFT REQUEST FOR ADDITIONAL INFORMATION
KEWAUNEE POWER STATION
LICENSE AMENDMENT REQUEST FOR PERMANENTLY DEFUELED TECHNICAL
SPECIFICATIONS
DOCKET NO. 50-305**

In letters dated May 29, 2013 and October 15, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession Numbers ML13156A037 and ML13294A091), Dominion Energy Kewaunee, Inc. (DEK, the licensee) submitted a license amendment request regarding Kewaunee Power Station (KPS) Facility Operating License. The proposed amendment would modify Technical Specifications (TSs) to a set of permanently defueled TSs.

On February 25, 2013, DEK submitted a certification to the NRC indicating its intention to permanently cease power operations at KPS pursuant to 10 CFR 50.82(a)(1)(i); DEK permanently ceased power operation of KPS on May 7, 2013. With the docketing of the subsequent certification for permanent removal of fuel from the reactor vessel pursuant to 10 CFR 50.82(a)(1)(ii) on May 14, 2013, 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). In support of this condition, the KPS license and associated TS are being proposed for revision to reflect a permanently shut down and defueled condition in accordance with 10 CFR 50.36(c)(6).

The NRC staff requested additional information that would address question, "NRC Question MF1952-RAI-STSB-Grover-005," stated below:

DEK proposes to delete paragraph c of TS 5.2.2, which states:

A radiation technologist shall be on site when fuel is in the reactor.
The position may be vacant for not more than 2 hours, except in severe weather conditions, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

DEK stated that this paragraph is being deleted because this requirement only applies when fuel is in the reactor. The NRC staff believes it is prudent to have an individual qualified in radiation protection procedures on site during fuel handling operations or during movements of loads over storage racks containing fuel.

Paragraph c of TS 5.2.2 does not require the radiation protection staff to be onsite during fuel handling operations or during movements of loads over storage racks containing fuel. Please provide a requirement that requires the radiation protection staff to be on-site during fuel handling operations or during movements

of loads over storage racks containing fuel, or provide the basis for not needing one.

In letter dated October 15, 2013, DEK provided a response to NRC staff's request for additional information, "NRC Question MF1952-RAII-STSB-Grover-005." The licensee's response stated that:

DEK also believes that it is prudent to have an individual qualified in radiation protection procedures on site during fuel handling operations. DEK believes that such requirements are appropriately managed via licensee-controlled documents (e.g., procedures) rather than Technical Specifications. ...

The existing procedural and TRM [Technical Requirements Manual] requirements are adequate to ensure that appropriate coverage by radiation protection staff is provided during fuel handling operations and during movement of loads over storage racks containing spent fuel.

The existing paragraph c of TS 5.2.2 is consistent with NUREG-1431, Standard Technical Specifications, which does not specify a requirement for radiation protection staff to be on-site, except when fuel is in the reactor. Leaving TS 5.2.2.c unchanged would not alter any requirement at KPS, since this TS does not address the permanently defueled condition of KPS. Since staffing requirements for radiation protection personnel during spent fuel handling operations and during movement of loads over storage racks containing spent fuel are appropriately addressed via plant procedures, TS 5.2.2.c remains proposed for deletion as stated in the original submittal.

In addition, DEK stated that KPS and Millstone are both part of the Dominion fleet and therefore, they are trying to maintain consistency with Millstone Unit 1 TSs.

Basis for the Request

NUREG-1431, "Standard Technical Specifications, Westinghouse Plant," are generic TSs for operational reactors and they do not contain TSs for permanently defueled reactor plants. Proposed TSs for permanently defueled Westinghouse plants are contained in draft NUREG-1625, "Proposed Standard Technical Specifications for Permanently Defueled Westinghouse Plants." This draft requires in TS 5.2.2.c and TS 5.2.2.d that:

- c. An individual qualified in radiation protection procedures shall be on site during fuel handling operations or movement of loads over storage racks containing fuel;
- d. Fuel handling operations or movement of loads over storage racks containing fuel shall be directly supervised by a CERTIFIED FUEL HANDLER;

In addition, Millstone Unit 1 TSs require in TS 5.2.2.d and TS 5.2.2.e that:

- d. An individual qualified in radiation protection procedures shall be onsite during fuel handling operations.
- e. All fuel handling operations shall be directly supervised by a qualified individual.

As the NRC staff has previously stated we believe it is prudent to have an individual qualified in radiation protection procedures on site during fuel handling operations or during movements of loads over storage racks containing fuel. In addition, the staff believes this requirement should be maintained in TSs.

Request for Additional Information

Proposed TS 5.2.2 does not require the radiation protection staff to be on-site during fuel handling operations or during movements of loads over storage racks containing fuel. The NRC staff does not find this proposed change to be acceptable for a defueled reactor plant, as it is currently proposed. Please provide a requirement that is consistent with both draft NUREG-1625 and Millstone Unit 1 TSs or provide a technical basis for not maintaining consistency with Millstone Unit 1 TSs, since you stated that you would maintain consistency with Millstone Unit 1 in your response dated October 15, 2013.

Regulatory Analysis Basis

10 CFR 50.90, Application for amendment of license, construction permit, or early site permit states:

“Whenever a holder of a license, including a construction permit and operating license under this part, and an early site permit, combined license, and manufacturing license under part 52 of this chapter, desires to amend the license or permit, application for an amendment must be filed with the Commission, as specified in §§ 50.4 or 52.3 of this chapter, as applicable, fully describing the changes desired, and following as far as applicable, the form prescribed for original applications.”

Please call 301-415-2046 if you would like to set up a conference call to clarify the request for information.

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