



October 13, 2016

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

Serial No. 16-152
LIC/JG/R0
Docket No.: 50-305
License No.: DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
REQUEST FOR EXEMPTION FROM RECORD RETENTION REQUIREMENTS

Pursuant to 10 CFR 50.12, Dominion Energy Kewaunee, Inc. (DEK) requests partial exemption from the following record retention requirements for Kewaunee Power Station (KPS). The requested exemption would eliminate record retention requirements that are no longer necessary or applicable due to the permanently defueled condition and decommissioning status of the station.

1. 10 CFR Part 50, Appendix B, Criterion XVII, "Quality Assurance Records," which requires certain records be maintained consistent with applicable regulatory requirements;
2. 10 CFR 50.59(d)(3), which requires that records of changes in the facility must be maintained until "termination of an operating license issued under this part;" and
3. 10 CFR 50.71(c), which requires certain records to be retained for the period specified by the appropriate regulation, license condition, or technical specification, or until termination of the license if not otherwise specified.

Since KPS is not a General Design Criteria plant, 10 CFR Part 50, Appendix A, Criterion 1, which requires certain records to be maintained "throughout the life of the unit," is not applicable; hence, no exemption from this requirement is needed.

By letter dated May 14, 2013, DEK submitted a certification of permanent removal of fuel from the reactor vessel (Reference 1). Consequently, 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 its decommissioning plan for KPS, DEK submitted a request for conforming technical specifications (Reference 2) that would specify that spent fuel may no longer be stored within the spent fuel pool (SFP). Approval of Reference 2 will modify the KPS technical specifications to prohibit storage of fuel in the SFP.

With the termination of reactor operations at KPS and following the permanent removal of the fuel from the SFP, the systems associated with reactor and SFP operation will no longer be needed. Upon removal from the Updated Safety Analysis Report and/or Technical Specifications by appropriate change processes, these systems will also no longer be operated or maintained.

ADD
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The requested exemption will eliminate the requirement to maintain records that are no longer necessary due to the permanently defueled status of KPS. DEK will use the granted exemption to eliminate the applicable records associated with structures, systems, components, and activities no longer required by the Part 50 licensing basis.

The exemption request is contained in the attachment to this letter. DEK requests approval of this exemption request by June 30, 2017.

Please contact Mr. Jack Gadzala at 920-388-8604 if you have any questions or require additional information.

Sincerely,



Mark D. Sartain
Vice President – Nuclear Engineering

Attachment:

1. Request for Exemption from Record Retention Requirements

Commitments made by this letter: None

References:

1. Letter from Daniel G. Stoddard (DEK) to NRC Document Control Desk, "Certification of Permanent Removal of Fuel from the Reactor Vessel," dated May 14, 2013 [ADAMS Accession No. ML13135A209]
2. Letter from Gianna C. Clark (DEK) to NRC Document Control Desk, "License Amendment Request 260, Independent Spent Fuel Storage Installation License and Technical Specifications," dated September 14, 2015.

cc: Regional Administrator, Region III
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ATTACHMENT 1

REQUEST FOR EXEMPTION FROM RECORD RETENTION REQUIREMENTS

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

Kewaunee Power Station
Request for Exemption from Record Retention Requirements

I. DESCRIPTION

Pursuant to 10 CFR 50.12, Dominion Energy Kewaunee, Inc. (DEK) requests partial exemption from the following record retention requirements for Kewaunee Power Station (KPS).

1. 10 CFR Part 50, Appendix B, Criterion XVII, "Quality Assurance Records," which requires certain records be maintained consistent with applicable regulatory requirements;
2. 10 CFR 50.59(d)(3), which requires that records of changes in the facility be maintained until "termination of an operating license issued under this part;" and
3. 10 CFR 50.71(c), which requires certain records to be retained for the period specified by the appropriate regulation, license condition, or technical specification, or until termination of the license if not otherwise specified.

Since KPS is not a General Design Criteria plant, 10 CFR Part 50, Appendix A, Criterion 1, which requires certain records to be maintained "throughout the life of the unit," is not applicable; hence, no exemption from this requirement is needed.

The exemption is requested to allow DEK to eliminate the requirement to maintain records that are no longer necessary or applicable due to the permanently defueled condition and decommissioning status of the station. Specifically, the following records would no longer be retained:

1. Records associated with structures, systems, and components (SSCs), and activities that were applicable to the nuclear unit, which are no longer required by the Part 50 licensing basis (i.e., removed from the Updated Safety Analysis Report and/or Technical Specifications by appropriate change mechanisms); and
2. Records associated with storage of spent nuclear fuel in the spent fuel pool (SFP) once all fuel has been removed from the SFP and the KPS license no longer allows storage of fuel in the SFP.

Although the current Part 50 regulatory requirements (developed for operating reactors) ensure safety at facilities in decommissioning, some of these requirements are excessive and do not substantially contribute to public safety.

The pertinent regulations are restated below. Exemption is being requested from these regulations only for the records as discussed above. Bolded sections highlight key points of the regulation.

1. 10 CFR Part 50, Appendix B, Criterion XVII, Quality Assurance Records

*Sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include at least the following: Operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analyses. The records shall also include closely-related data such as qualifications of personnel, procedures, and equipment. Inspection and test records shall, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted. Records shall be identifiable and retrievable. **Consistent with applicable regulatory requirements, the applicant shall establish requirements concerning record retention**, such as duration, location, and assigned responsibility.*

2. 10 CFR 50.59(d)(3)

*The records of changes in the facility must be maintained **until the termination of an operating license issued under this part**, a combined license issued under part 52 of this chapter, or the termination of a license issued under 10 CFR part 54, whichever is later. Records of changes in procedures and records of tests and experiments must be maintained for a period of 5 years.*

3. 10 CFR 50.71(c)

*Records that are required by the regulations in this part or part 52 of this chapter, by license condition, or by technical specifications must be **retained for the period specified by the appropriate regulation, license condition, or technical specification**. If a retention period is not otherwise specified, these records must be retained until the Commission terminates the facility license or, in the case of an early site permit, until the permit expires.*

II. BACKGROUND

By letter dated May 14, 2013, DEK submitted a certification of permanent removal of fuel from the reactor vessel (Reference 1). Consequently, 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).

DEK's decommissioning plans for KPS are described in the Post Shutdown Decommissioning Activities Report (PSDAR) submitted on April 25, 2014 (Reference 2). DEK plans to decommission KPS using a SAFSTOR method in which most fluid systems are drained and the plant is left in a stable condition until final decontamination and dismantlement activities begin. The irradiated fuel will be stored in the ISFSI until it is shipped off site. With the reactor and the SFP emptied of fuel, the reactor, reactor coolant system, secondary system, and SFP (including its support systems) are no longer in operation and have no function related to the safe storage and management of irradiated fuel.

In support of its decommissioning plan, DEK submitted a request for conforming technical specifications, dated September 14, 2015 (Reference 3), wherein spent fuel would no longer be permitted to be stored within the spent fuel pool (SFP). Approval of Reference 3 will modify the KPS license to prohibit storage of fuel in the SFP. With the termination of reactor operations at KPS and following the permanent removal of the fuel from the SFP, the systems associated with reactor and SFP operation will no longer be needed. Upon removal from the Updated Safety Analysis Report and/or Technical Specifications by appropriate change processes, these systems will also no longer be operated or maintained to support their former licensing basis functions.

As decommissioning transitions from the current plant conditions to fully dismantled with the fuel in dry storage, the regulatory and business need to maintain many records will diminish to insignificance. As SSCs are removed from the licensing basis, the need to retain most of their associated records becomes unnecessary. DEK is requesting exemption from the records retention requirements for KPS SSCs and historical activities that are no longer relevant. This exemption would eliminate the associated, unnecessary regulatory and economic burdens of retaining records for SSCs that are no longer part of the KPS licensing basis.

III. EVALUATION

After the SFP is emptied of fuel, the KPS nuclear power unit and SFP SSCs will be abandoned in place pending dismantlement. After being removed from the Updated Safety Analysis Report and/or Technical Specifications by appropriate change mechanisms, the associated SSCs will no longer be operable or maintained to support their former licensing basis functions.

A. Nuclear Power Generation SSCs and Activities

As described in the PSDAR (Reference 2), many of the KPS reactor facility SSCs are planned to be abandoned in place pending dismantlement. Abandoned SSCs are no longer operable or maintained. Following permanent removal of fuel from the SFP, those SSCs required to support safe storage of spent fuel in the SFP will also be abandoned. The basis for eliminating records associated with reactor facility SSCs and activities is that these SSCs have been (or will be) removed from service per regulatory change processes, dismantled or demolished, and no longer have any function regulated by the NRC.

DEK recognizes that some records related to the nuclear unit will continue to be under NRC regulation primarily due to residual radioactivity. The radiological and other necessary programmatic controls (such as security, quality assurance, etc.) for the facility and the implementation of controls for the defueled condition and the decommissioning activities are and will continue to be appropriately addressed through the license and current plant documents such as the Updated Safety

Analysis Report and Technical Specifications. Except for future changes made through the applicable change process defined in the regulations (e.g., 10 CFR 50.48(f), 10 CFR 50.59, 10 CFR 50.90, 10 CFR 50.54(a), 10 CFR 50.54(p), 10 CFR 50.54(q), etc.), these programmatic elements and their associated records are unaffected by the requested exemption.

B. Spent Fuel Pool and Associated SSCs and Activities

Records necessary for SFP SSCs and activities will continue to be retained through the period that the SFP is needed for safe storage of irradiated fuel. Analogous to other plant records, once the SFP is permanently emptied of fuel, there will be no need for retaining SFP related records. Also, similar to the nuclear unit SSCs, DEK recognizes that some records related to the SFP SSCs will continue to be under NRC regulation primarily due to residual radioactivity. The radiological and other necessary programmatic controls (such as security, quality assurance, etc.) for the facility and the implementation of controls for the defueled condition and the decommissioning activities are and will continue to be appropriately addressed through the license and current plant documents such as the Updated Safety Analysis Report and Technical Specifications. Except for future changes made through the applicable change process defined in the regulations (e.g., 10 CFR 50.48(f), 10 CFR 50.59, 10 CFR 50.90, 10 CFR 50.54(a), 10 CFR 50.54(p), 10 CFR 50.54(q), etc.), these programmatic elements and their associated records are unaffected by the requested exemption.

The requested exemption is consistent with the retention period for records of changes in the facility or spent fuel storage cask design implemented under 10 CFR 72.48, Changes, Tests, and Experiments. 10 CFR 72.48(d)(3)(i) specifically states that records are to be retained until "... Spent fuel is no longer stored in the facility." This is analogous to the condition wherein the fuel has been permanently removed from the SFP and placed in storage within the ISFSI.

Summary

DEK intends to retain the records required by its license as facility decommissioning transitions as described in the PSDAR. However, equipment abandonment will obviate the regulatory and business needs for maintenance of most records. As the SSCs are removed from the licensing basis the need for their records is, on a practical basis, eliminated. Therefore, DEK is requesting exemption from the associated records retention requirements for SSCs and historical activities that are no longer relevant. Approval of the requested exemption would eliminate the associated burden of creating alternative record storage locations, relocating records to, and retaining records in the alternative locations for those records relevant only to past power operations.

DEK is not requesting exemption from any record keeping requirements for storage of spent fuel at an ISFSI under 10 CFR Part 50 or the general license requirements of 10 CFR Part 72.

IV. JUSTIFICATION FOR EXEMPTION AND SPECIAL CIRCUMSTANCES

10 CFR 50.12 states that the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of Part 50 which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. 10 CFR 50.12 also states that the Commission will not consider granting an exemption unless special circumstances are present. As discussed below, this exemption request satisfies the provisions of Section 50.12.

A. The exemption is authorized by law

Paragraph 50.71(d)(2) allows for the granting of specific exemptions to the record retention requirements specified in the regulations. Paragraph 50.71(d)(2) states, in part: "...the retention period specified in the regulations in this part for such records shall apply unless the Commission, pursuant to §50.12 of this part, has granted a specific exemption from the record retention requirements specified in the regulations in this part."

As discussed below, the specific exemption requirements of 10 CFR 50.12 are satisfied; therefore the exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B, Criterion XVII, and 10 CFR 50.59(d)(3) is authorized by law. The proposed exemption would not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. Therefore, the exemption is authorized by law.

B. The exemption will not present an undue risk to the public health and safety

The partial exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B, Criterion XVII; and 10 CFR 50.59(d)(3), for the records described above is administrative in nature and will have no impact on any remaining decommissioning activities or on radiological effluents. The exemption would merely advance the schedule for disposition of the specified records consistent with actual plant condition of no longer legally or physically capable of operation. Considering the content of these records, their disposition on an advanced timetable will have no reasonable possibility of presenting an undue risk to the public health and safety.

C. The exemption is consistent with the common defense and security

Elimination of recordkeeping requirements is administrative in nature and does not involve information or activities that could potentially impact the common defense and security. Following removal of fuel from the SFP, the subject SSCs and their associated records have no functional purpose relative to maintaining the safe

operation of these SSCs or to maintaining conditions that would affect the ongoing health and safety of workers or the public.

The requested exemption is administrative in nature and would merely advance the current schedule for disposition of the specified records consistent with the retired status of the equipment and elimination of any future functional need. Therefore, the partial exemption from the recordkeeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B, Criterion XVII; and 10 CFR 50.59(d)(3), for the types of records described above is consistent with the common defense and security. Being administrative in nature, the exemption will not adversely affect DEK's ability to physically secure the site or protect special nuclear material. Physical security measures at KPS are not affected by the requested exemption. Therefore, the proposed exemption is consistent with the common defense and security.

D. Special Circumstances

Pursuant to 10 CFR 50.12(a)(2), the NRC will not consider granting an exemption to its regulations unless special circumstances are present. Special circumstances for the proposed exemption are present as discussed below.

1. Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule. (10 CFR 50.12(a)(2)(ii))

Appendix B of 10 CFR Part 50, Criterion XVII, states in part: "Sufficient records shall be maintained to furnish evidence of activities affecting quality."

Paragraph 50.59(d)(3) states in part: "The records of changes in the facility must be maintained until the termination of an operating license issued under this part..."

Paragraph 50.71(c), states in part: "Records that are required by the regulations in this part or Part 52 of this chapter, by license condition, or by technical specifications must be retained for the period specified by the appropriate regulation, license condition, or technical specification. If a retention period is not otherwise specified, these records must be retained until the Commission terminates the facility license..."

The common and underlying purpose for the records-related regulations cited above is to ensure that the licensing, design basis and applicable operating history of the facility is understood, documented, preserved, and retrievable relative to establishing and maintaining the SSCs' safety functions for the life of the facility. These regulations, however, do not consider the physical reduction in safety-related SSCs during the decommissioning process after cessation of plant operations and removal of nuclear fuel. Removal of SSCs from the licensing basis has been, or would be, evaluated in accordance with the applicable change

process in the regulations, e.g., 10 CFR 50.59, or NRC approved license amendment, prior to elimination of any associated records. Retention of records associated with SSCs that are or will no longer be part of the facility licensing basis serves no safety or regulatory purpose. Ultimately, the SSCs will be physically removed from the facility. Therefore, application of these record requirements in those circumstances does not serve the underlying purpose of the regulations.

Based on the above, application of the subject record keeping requirements to the KPS records specified above is not required to achieve the underlying purpose of the rule.

2. Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated. (10 CFR 50.12(a)(2)(iii))

The records retention requirements applied by the NRC to the construction and operation of nuclear power plants are intended to demonstrate, on a broad basis, that SSCs and activities are supportive of the safety analysis and the requirements of the NRC license for an operating reactor and operability of its safety functions. The records program requirements provide assurance that records will be captured, indexed, and stored in an environmentally suitable and retrievable condition resulting in a significant volume of records of many forms being required to be maintained with an associated continuing maintenance cost. The burden associated with the operations phase records requirements was understood and considered appropriate by the NRC and their reactor licensees. However, the effect of maintaining the operations phase record retention requirements following plant shutdown and which no longer serve an underlying safety purpose were not fully understood or considered. Such is the current situation at decommissioning facilities. The operating reactor records retention requirements to which KPS is currently obligated are no longer necessary nor appropriate in that the SSCs and activities to which many of the records apply are no longer relevant to the facility, the public, or worker health and safety.

Additionally, several similarly situated (*i.e.*, shutdown) facilities—including Millstone Power Station, Unit No. 1 (Reference 4); Zion Nuclear Power Station, Units 1 and 2 (Reference 5); Vermont Yankee Nuclear Power Station (Reference 6); and San Onofre Nuclear Generating Station, Units 1, 2, and 3 (Reference 7)—have been granted exemptions essentially identical to the one requested here.

Therefore, compliance with the rule to maintain unnecessary operational records would result in an undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted.

V. ENVIRONMENTAL CONSIDERATION

The proposed exemption meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(25), because the proposed exemption involves: (i) no significant hazards consideration; (ii) no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (iii) no significant increase in individual or cumulative public or occupational radiation exposure; (iv) no significant construction impact; (v) no significant increase in the potential for or consequences from radiological accidents; and (vi) the requirements from which the exemption is sought involve recordkeeping requirements and other requirements of an administrative nature. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed exemption.

(i) No significant hazards consideration

DEK has evaluated the proposed exemption to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92 as discussed below:

1. Does the proposed exemption involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed exemption has no effect on structures, systems, and components (SSCs) and no effect on the capability of any plant SSC to perform its design function. The proposed exemption would not increase the likelihood of the malfunction of any plant SSC.

The probability of occurrence of previously evaluated accidents is not increased because the proposed exemption is from administrative recordkeeping requirements.

Therefore, the proposed exemption does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed exemption create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed exemption does not involve a physical alteration of the plant. No new or different type of equipment will be installed and there are no physical modifications to existing equipment associated with the proposed exemption. Similarly, the proposed exemption would not physically change any structures, systems or components involved in the mitigation of any accidents. Thus, no new initiators or precursors of a new or different kind of accident are created. Furthermore, the proposed exemption does not create the possibility of a new accident as a result of new failure modes associated with any equipment or

personnel failures. No changes are being made to parameters within which the plant is normally operated, or in the setpoints which initiate protective or mitigative actions, and no new failure modes are being introduced.

Therefore, the proposed exemption does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed exemption involve a significant reduction in a margin of safety?

The proposed exemption does not alter the design basis or any safety limits for the plant. The proposed exemption does not impact station operation or any plant SSC that is relied upon for accident mitigation.

Therefore, the proposed exemption does not involve a significant reduction in a margin of safety.

Based on the above, DEK concludes that the proposed exemption presents no significant hazards consideration, and, accordingly, a finding of "no significant hazards consideration" is justified.

(ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

There are no expected changes in the types, characteristics, or quantities of effluents discharged to the environment associated with the proposed exemption. There are no materials or chemicals introduced into the plant that could affect the characteristics or types of effluents released offsite. In addition, the method of operation of waste processing systems will not be affected by the exemption. The proposed exemption will not result in changes to the design basis requirements of SSCs that function to limit or monitor the release of effluents. Therefore, the proposed exemption will result in no significant change to the types or significant increase in the amounts of any effluents that may be released offsite.

(iii) There is no significant increase in individual or cumulative public or occupational radiation exposure.

The exemption would result in no expected increases in individual or cumulative occupational radiation exposure on either the workforce or the public. There are no expected changes in normal occupational doses. Likewise, design basis accident dose is not impacted by the proposed exemption.

(iv) There is no significant construction impact.

There are no construction activities associated with the proposed exemption.

- (v) **There is no significant increase in the potential for or consequences from radiological accidents.**

See the no significant hazards considerations discussion in item (i) above.

- (vi) **The requirements from which the exemption is sought involve: 10 CFR 51.22(c)(25)(vi)(A) & (I), recordkeeping requirements and other requirements of an administrative nature.**

The requirements from which the exemption is being sought involve administrative recordkeeping requirements as defined in 10 CFR Part 50, Appendix B, Criterion XVII, 10 CFR 50.59(d)(3), and 10 CFR 50.71(c).

VI. PRECEDENT

The following similar licensing actions have been approved by the NRC:

- On January 30, 2007, the NRC granted exemption from recordkeeping requirements to Millstone Power Station, Unit 1 (Reference 4).
- On June 23, 2011, the NRC granted exemption from recordkeeping requirements to Zion Nuclear Power Station, Units 1 and 2 (Reference 5).
- On December 22, 2015, the NRC granted exemption from recordkeeping requirements to Vermont Yankee Nuclear Power Station (Reference 6).
- On July 18, 2016, the NRC granted exemption from recordkeeping requirements to San Onofre Nuclear Generating Station, Units 1, 2, and 3 (Reference 7).

VII. CONCLUSION

The information above provides sufficient basis for granting exemption from the recordkeeping requirements of 10 CFR Part 50 Appendix B Criterion XVII, 10 CFR 50.59(d)(3), and 10 CFR 50.71(c) for: 1) records pertaining to SSCs or activities associated with the nuclear power unit and associated support systems that are no longer required to support licensed operations at the KPS site; and 2) records pertaining to the SFP and associated support systems for the safe storage of fuel in the SFP after all the irradiated fuel has been permanently removed from the SFP and placed in storage within the ISFSI. This exemption does not apply to any record keeping requirements for spent fuel or for spent fuel storage SSCs and activities at the KPS ISFSI under 10 CFR Part 50 or the general requirements of 10 CFR Part 72.

The requested exemption is authorized by law, will not present an undue risk to the public health and safety, are consistent with the common defense and security, and special circumstances are present as set forth in 10 CFR 50.12(a)(2).

REFERENCES

1. Letter from Daniel G. Stoddard (DEK) to NRC Document Control Desk, "Certification of Permanent Removal of Fuel from the Reactor Vessel," dated May 14, 2013 [ADAMS Accession No. ML13135A209].
2. Letter from D. G. Stoddard (DEK) to NRC Document Control Desk, "Revision to Post-Shutdown Decommissioning Activities Report," dated April 25, 2014 [ADAMS Accession No. ML14118A382].
3. Letter from Gianna C. Clark (DEK) to NRC Document Control Desk, "License Amendment Request 260, Independent Spent Fuel Storage Installation License and Technical Specifications," dated September 14, 2015.
4. Letter from J. B. Hickman (NRC) to D. A. Christian (Dominion Nuclear Connecticut, Inc.), "Millstone Power Station, Unit No. 1 – Partial Exemption from Record Keeping Requirements (TAC No. J00287)," dated January 30, 2007 [ADAMS Accession No. ML070110567].
5. Letter from J. B. Hickman (NRC) to J. A. Christian (ZionSolutions, LLC), "Zion Nuclear Power Station, Units 1 and 2 – Exemption from Record Keeping Requirements (TAC Nos. J00400 and J00401)," dated June 23, 2011 [ADAMS Accession No. ML111260266].
6. Letter from J. Kim (NRC) to Vice President, Operations (Entergy Nuclear Operations, Inc.), "Vermont Yankee Nuclear Power Station – Partial Exemptions from the Requirements of 10 CFR Part 50, Appendix B, Criterion XVII; 10 CFR 50.59(d)(3); 10 CFR 50.71(c) (CAC No. MF5846)," dated December 22, 2015 [ADAMS Accession No. ML15344A243].
7. Letter from M. Vaaler (NRC) to T. Palmisano (Southern California Edison Co.), "San Onofre Nuclear Generating Station, Units 1, 2, and 3 – Exemption from Record Keeping Requirements (CAC Nos. L53076 and L53077)," dated July 18, 2016 [ADAMS Accession No. ML15355A055].