



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

January 29, 2020

Mr. Daniel G. Stoddard
President and Chief Nuclear Officer
Dominion Energy Kewaunee, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: NRC INSPECTION REPORT NOS. 05000305/2019001 AND 07200064/2019001
KEWAUNEE POWER STATION

Dear Mr. Stoddard:

On December 31, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed onsite inspection activities for April through December 2019, at the permanently shut down Kewaunee Power Station (KPS) in Kewaunee, Wisconsin. The purpose of the inspection was to determine whether decommissioning activities were conducted safely and in accordance with NRC requirements. The enclosed report presents the results of this inspection, which were discussed with Mr. B. McMahon and other members of your staff on January 15, 2020.

During the inspection period, the NRC inspectors reviewed the following aspects of onsite activities: organization, management, and cost control at the site; safety reviews, design changes and modifications; self-assessments, audits, and corrective actions; operation of an Independent Spent Fuel Storage Installation (ISFSI); decommissioning performance; occupational radiation exposure; radiological surveys; materials control and accounting; radioactive waste treatment, effluent, and environmental monitoring; and solid radioactive waste management and transportation of radioactive material. The inspection consisted of an examination of activities at the site as they relate to safety and compliance with the Commission's rules and regulations. Areas examined during the inspection are identified in the enclosed report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observation of work activities, and interviews with personnel.

Based on the results of this inspection, no violations of NRC requirements were identified.

This letter and its enclosure will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC's Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* (CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Michael A. Kunowski, Chief
Materials Control, ISFSI, and
Decommissioning Branch
Division of Nuclear Materials Safety

Docket Nos 50-305, 72-064
License No DPR-43

Enclosure:
IR Nos. 05000305/2019001; 07200064/2019001

cc w/encl: Distribution via LISTSERV®

Letter to Daniel Stoddard from Michael Kunowski dated January 29, 2020.

SUBJECT: NRC INSPECTION REPORT NOS. 05000305/2019001 AND 07200064/2019001
KEWAUNEE POWER STATION

DISTRIBUTION w/encl:

Darrell Roberts
Jack Giessner
Christine Lipa

David Pelton
Bruce Watson
Ted Carter

Stuart Sheldon
MCID Inspectors

ADAMS Accession Number: ML20030A160

OFFICE	RIII-DNMS	E	RIII-DNMS	E				
NAME	REdwards:ps		MKunowski					
DATE	02/29/2020		02/29/2020					

OFFICIAL RECORD COPY

U.S. NUCLEAR REGULATORY COMMISSION
REGION III

Docket Nos: 050-00305
072-00064

License No: DPR-43

Report Nos: 05000305/2019001
07200064/2019001

Enterprise Identifier: I-2019-001-0091
I-2019-001-0112

Licensee: Dominion Energy Kewaunee, Inc., (DEK)

Facility: Kewaunee Power Station (KPS)

Location: Kewaunee, WI

Dates: April 1, 2019, through December 31, 2019

Inspectors: Rhex A. Edwards, Senior Health Physicist
Michael M. LaFranzo, Senior Health Physicist
Matthew C. Learn, Reactor Engineer
Bill C. Lin, Health Physicist

Approved by: Michael A. Kunowski, Chief
Materials Control, ISFSI, and
Decommissioning Branch
Division of Nuclear Materials Safety

Enclosure

EXECUTIVE SUMMARY

Kewaunee Power Station NRC Inspection Report 05000305/2019001 and 07200064/2019001

Kewaunee Power Station (KPS) operated at full power until May 7, 2013, when KPS shutdown and permanently ceased power operation. On May 14, 2013, KPS certified the permanent removal of fuel from the reactor vessel (ADAMS Accession No. ML13135A209). On May 31, 2013, the U.S. Nuclear Regulatory Commission (NRC) notified KPS that the Operating Reactor Assessment Program had ceased and that implementation of the Decommissioning Power Reactor Inspection Program would begin on June 1, 2013 (ADAMS Accession No. ML13151A375).

Currently, KPS is a permanently shut-down and defueled power reactor facility that was maintained in a Safe Storage (SAFSTOR) condition with all the spent fuel stored at an Independent Spent Fuel Storage Installation (ISFSI).

Organization, Management, and Cost Controls

- The licensee adequately implemented organization, management, and cost controls in accordance with regulatory requirements, license conditions, and the Technical Specifications (TSs). (Section 1.0)

Safety Reviews, Design Changes, and Modifications

- The licensee performed adequate safety evaluations or screenings, completed design change evaluations, and properly assessed decommissioning impacts of various work activities as required by Title 10 of the *Code of Federal Regulations* (CFR) 50.59. (Section 2.0)

Self-Assessment, Auditing, and Corrective Action

- Issues were identified by the licensee at appropriate thresholds and entered into the Corrective Action Program (CAP). Issues were screened and prioritized commensurate with safety significance. Licensee evaluations determined the significance of issues and included appropriate remedial corrective actions. (Section 3.0)

Operation of an Independent Spent Fuel Storage Installation

- The licensee implemented its surveillance, maintenance, radiological monitoring, and quality assurance programs as it pertains to the ISFSI in accordance with applicable NRC requirements, their license, and the Certificate of Compliances (CoC). (Section 4.0)

Decommissioning Performance and Status Review

- The inspectors determined that the licensee conducted decommissioning activities in accordance with the regulations and license requirements. The inspectors verified that the licensee's activities were in accordance with TSs, the Updated Safety Analysis Report (USAR), and the Post-Shutdown Decommissioning Activities Report (PSDAR). (Section 5.0)

Occupational Radiation Exposure

- Decommissioning activities were executed in general alignment with planning documents and as provided in Radiation Work Permits (RWPs) and As Low As is Reasonably Achievable (ALARA) reviews. Radiation surveys were performed adequately to identify the hazards present. Command and control of radiologically significant activities was executed in a manner that was safe and achieved the desired result. (Section 6.0)

Inspection of Remedial and Final Surveys at Permanently Shutdown Reactors

- The review of the licensee's survey results, performed in support of reconfiguring abandoned waste water treatment lagoons, is ongoing and will continue into calendar year 2020. (Section 7.0)

Radioactive Waste Treatment, and Effluent and Environmental Monitoring

- The licensee controlled, monitored, and quantified releases of radioactive materials to the environment to ensure offsite doses were within regulatory limits and ALARA. (Section 8.0)

Materials Control and Accounting at Decommissioning Reactors

- The inspectors determined that the licensee conducted materials control and accounting activities in accordance with the regulations. (Section 9.0)

Solid Radioactive Waste Management and Transportation of Radioactive Materials

- Radioactive materials planned for shipment were classified, characterized, and packaged appropriately, in accordance with NRC and the Department of Transportation (DOT) requirements. (Section 10.0)

Report Details

Summary of Plant Activities

During the inspection period, the licensee maintained the unit in SAFSTOR conditions.

1.0 Organization, Management, and Cost Controls at Permanently Shutdown Reactors (Inspection Procedure (IP) 36801)

1.1 Inspection Scope

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- Implementation of CAP procedures;
- Regulatory requirements were properly implemented with respect to the site organization, staffing, and staff qualifications;
- Future licensee plans for decommissioning organization and staffing would continue to meet regulatory requirements;
- Licensee appropriately implemented TS, Technical Requirements Manual, PSDAR, and fire protection plan requirements and commitments; and
- Licensee continued implementation of regulatory requirements that remained applicable as described in NRC Bulletins, Generic Letters, and Orders.

As part of the inspection, the inspectors verified that licensee programs and procedures were appropriately implemented by licensee staff. In addition, the inspectors verified that when issues were identified, licensee personnel appropriately documented the issue in the CAP.

1.2 Observations and Findings

The inspectors determined through direct licensee observation, reviews of licensee programs and procedures, sampling of corrective action documents, and interviews with licensee personnel that the appropriate regulatory requirements and commitments were followed.

No findings were identified.

1.3 Conclusions

The licensee adequately implemented organization, management, and cost controls in accordance with regulatory requirements, license conditions, and the TSs.

2.0 Safety Reviews, Design Changes, and Modifications (IP 37801)

2.1 Inspection Scope

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- Determination that licensee procedures and processes conform to the regulation and guidance associated with 10 CFR 50.59;
- Implementation of a sampling of design change modifications to verify that procedures and controls were followed; and confirm that the applicable changes were effectively implemented in the field and in plant procedures, drawings, and training programs if applicable; and
- Verification that changes made under 10 CFR 50.59 did not require prior NRC approval.

The inspectors verified that when issues were identified that licensee personnel appropriately documented the issue in the CAP.

2.2 Observations and Findings

The inspectors reviewed the licensee's programs for changes and performed a review of procedure and modification changes on a sample of licensee-approved changes. Specifically, the inspectors reviewed changes to the Fire Protection Program Plan and Technical Requirements Manual.

No findings were identified.

2.3 Conclusions

The licensee performed adequate safety evaluations or screenings, completed design change evaluations, and properly assessed decommissioning impacts of various work activities as required by 10 CFR 50.59.

3.0 **Self-Assessments, Auditing, and Corrective Action (IP 40801)**

3.1 Inspection Scope

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- Administrative procedures prescribed actions for the identification, evaluation, and resolution of problems;
- License procedures prescribed thresholds for the performance of self-assessments, audits, and surveillances;
- Licensee management reviewed self-assessments, audits, and corrective actions to remain knowledgeable of plant performance;

- Self-assessments were conducted with technically qualified personnel and sufficient independence from the licensee;
- Issues or problems were identified and corrected in accordance with the licensee's CAP; and
- Quality assurance personnel audited changes in the status of decommissioning and licensee organization.

The inspectors reviewed CAP documents to determine if a sufficiently low threshold for problem identification existed; the quality of follow-up evaluations, including extent-of-condition; and if the licensee assigned timely and appropriate prioritization for issue resolution commensurate with the significance of the issue.

3.2 Observations and Findings

The inspectors determined that issues were identified by the licensee at an appropriate threshold within various functional areas of the site and entered into the CAP. Issues were effectively screened, prioritized, and evaluated commensurate with safety significance. The scope and depth of evaluations were adequate in that the evaluations reviewed addressed the significance of issues and assigned an appropriate course of remedial action.

No findings were identified.

3.3 Conclusions

Issues were identified by the licensee at appropriate thresholds and entered into the CAP. Issues were screened and prioritized commensurate with safety significance. Licensee evaluations determined the significance of issues and included appropriate remedial corrective actions.

4.0 **Operation of an Independent Spent Fuel Storage Installation at Operating Plants (IP 60855.1)**

4.1 Inspection Scope

The inspectors evaluated the licensee's operation of the ISFSI to determine whether the licensee operated in accordance with the ISFSI Safety Analysis Reports, CoCs, Quality Assurance Program, and 10 CFR Part 72. Specifically, the inspectors verified that changes made to programs and procedures since the last inspection were evaluated against the requirements contained in 10 CFR 50.59 and 10 CFR 72.48, as applicable. The inspectors reviewed radiological survey records and conducted independent surveys of the ISFSI. Finally, the inspectors observed and evaluated the licensee's biennial emergency exercise on October 23, 2019.

4.2 Observations and Findings

The inspectors observed that the licensee was evaluating changes to the facility, programs, and procedures since the last inspection in accordance with 10 CFR 50.59, 10 CFR 72.48, and 10 CFR 72.212. Changes were consistent with the license and CoCs and did not reduce the effectiveness of the applicable programs.

The licensee performed routine surveys and environmental radiological monitoring as required for the ISFSI. The survey results indicated that radiological conditions were in accordance with the 10 CFR 72.104 limits.

The inspectors conducted a walk-down of the ISFSI pad and observed staff perform daily surveillances of the storage casks and modules, including thermal verifications. The inspectors also evaluated the structural condition of the pad, storage casks, and storage modules.

A review of corrective action reports written since the last ISFSI inspection indicated that the licensee was effectively identifying and correcting conditions adverse to quality.

No findings were identified.

4.3 Conclusions

The licensee implemented its surveillance, maintenance, radiological monitoring, and quality assurance programs as it pertains to the ISFSI in accordance with applicable NRC requirements, the license, and the CoCs.

5.0 **Decommissioning Performance and Status Reviews (IP 71801)**

5.1 Inspection Scope

The inspectors reviewed documents, interviewed plant personnel, and toured the plant to assess the licensee's performance in the following areas:

- Status of ongoing decommissioning activities and planning for future activities;
- Licensee activities were in accordance with license conditions and docketed commitments, as well as, within the bounds of the docketed PSDAR;
- Operability and functionality of systems necessary for safe decommissioning were assessed through plant walkdowns, including radioactive effluent monitoring and radiation protection (RP) monitors and alarms;
- Appropriate plant staffing was maintained, and appropriate management oversight of licensee and supplemental activities was performed;
- Pre-job briefs were conducted for facility operations, including maintenance, surveillance, operations, and decommissioning activities;

- In-plant field conditions and decommissioning abandonment activities were adequate;
- In-progress field work was conducted in accordance with approved work instructions and workers were knowledgeable of tasks; and
- Storage of combustibles and flammables was in accordance with plant procedures and the fire plan for the subject location.

The inspectors verified that when issues were identified, licensee personnel appropriately documented the issue in the CAP.

5.2 Observations and Findings

The inspectors determined through plant tours and activities observed that the licensee conducted activities in accordance with regulatory requirements and plant procedures.

No findings were identified.

5.3 Conclusions

The inspectors determined that the licensee conducted decommissioning activities in accordance with the regulations and license requirements. The inspectors verified that the licensee's activities were in accordance with TSs, the USAR, and the PSDAR.

6.0 **Occupational Radiation Exposure (IP 83750)**

6.1 Inspection Scope

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- Planning and preparation for radiation work were adequate and licensee management supported RP planning;
- Personal dosimetry for external exposure met requirements;
- Management and administrative controls of external radiation exposure met requirements and were designed to make exposures ALARA;
- Processes or engineering controls were used to the extent practicable to limit concentrations of airborne radioactive materials;
- Survey and monitoring activities were performed as required; and
- Control of radioactive materials and contamination met requirements;

The inspectors verified that when issues were identified, licensee personnel appropriately documented the issues in the CAP.

6.2 Observations and Findings

From April 1–3, 2019, the inspectors observed the licensee perform activities in support of demolishing a former training building located near State Highway 42 on the site's owner-controlled area. The building was never used for radiological purposes and was considered unimpacted from plant operations; however, the inspectors monitored the licensee's work and performed limited independent radiological surveys to verify that the building did not contain radioactive material. RP workers were observed performing radiological surveys and demonstrated effective implementation of the ALARA program.

No findings were identified.

6.3 Conclusions

Decommissioning activities were executed in general alignment with planning documents and as provided in RWPs and ALARA reviews. Radiation surveys were performed adequately to identify the hazards present. Command and control of radiologically significant activities was executed in a manner that was safe and achieved the desired result.

7.0 **Inspection of Remedial and Final Surveys at Permanently Shutdown Reactors (IP 83801)**

7.1 Inspection Scope

The inspectors reviewed the licensee's plans for abandoning and reconfiguring three waste water treatment lagoons into a wetland configuration reviewed and approved by the Wisconsin Department of Natural Resources. In addition, the inspectors performed walk over radiological scans and collected soil samples of the lagoons for further laboratory analysis.

7.2 Observations and Findings

The licensee developed a sampling plan to characterize the sediment in the lagoons and surrounding areas. NRC inspectors independently developed their own survey to verify the licensee's results. The review of the inspector's and licensee's survey results is ongoing and will continue into calendar year 2020.

No findings were identified.

7.3 Conclusions

The review of the licensee's survey results, performed in support of reconfiguring abandoned waste water treatment lagoons, is ongoing and will continue into calendar year 2020.

8.0 **Radioactive Waste Treatment, and Effluent and Environmental Monitoring (IP 84750)**

8.1 Inspection Scope

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- Radioactive waste treatment systems were maintained and operated to keep offsite doses ALARA;
- The licensee effectively controlled, monitored, and quantified releases of radioactive materials in liquid, gaseous, and particulate forms to the environment; and
- The radiological environmental monitoring programs were effectively implemented to ensure effluent releases were being adequately performed as required to minimize public dose;

As part of the inspection, the inspectors verified that licensee programs and procedures were appropriately implemented by licensee staff. In addition, the inspectors verified that when issues were identified licensee personnel appropriately documented the issues in the CAP and adequate corrective actions were taken.

8.2 Observations and Findings

The inspectors noted during walkdowns of the above radioactive effluent equipment and pathways that they were configured as described in the Offsite Dose Calculation Manual (ODCM) and were in good material condition. In addition, the inspectors reviewed past Annual Radiological Effluent Release Reports and noted that liquid and gaseous releases were within ODCM limits. No environmental samples exceeded regulatory limits and anomalous readings identified in a monitoring well were appropriately investigated and the sampling frequency was increased until the values returned to expected values. The environmental monitoring program indicated that doses to a member of the public were within the limits of 10 CFR Part 20 and Part 72 and there were no anomalous results indicated in aquatic, vegetation, or soil samples. For the inter-laboratory comparison results reviewed, the inspectors noted the program contained the appropriate radioisotopes for current plant conditions and it was performed as required.

No findings were identified.

8.3 Conclusions

The licensee controlled, monitored, and quantified releases of radioactive materials released to the environment to ensure offsite doses were within regulatory limits and ALARA.

9.0 **Materials Control and Accounting at Decommissioning Reactors (IP 85103)**

9.1 Inspection Scope

The inspectors reviewed documents, interviewed plant personnel, and toured the plant to assess the licensee's performance in the following areas:

- The licensee implemented and is maintaining an adequate and effective program to control and account for the special nuclear material (SNM) in its possession; and
- The licensee can detect loss, theft, or diversion of SNM in a timely manner.

9.2 Observations and Findings

The inspectors determined through reviews of documents, interviews of plant personnel, and tours that the licensee conducted activities in accordance with regulatory requirements and plant procedures.

No findings were identified.

9.3 Conclusions

The inspectors determined that the licensee conducted materials control and accounting activities in accordance with the regulations.

10.0 **Solid Radioactive Waste Management and Transportation of Radioactive Materials (IP 86750)**

10.1 Inspection Scope

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- The licensee provided detailed instructions and operating procedures for transfer, packaging, and transport of low-level radioactive waste;
- Material was properly classified, described, packaged, marked, and labeled for transportation; and
- Shipments made by the licensee followed NRC and DOT regulations.

10.2 Observations and Findings

On September 23 and 24, 2019, inspectors reviewed the waste manifests and inspected the shipment of 10 packages containing waste destined for disposal at the Clive Disposal Facility in Utah. The exclusive use shipment contained waste from the spent fuel pool cleanup project and was inspected for compliance with posting, labeling, and radiological requirements. Characterization assumptions, activation analysis results, and shipping manifests were reviewed by the inspectors to verify the accuracy of the licensee's characterization and waste classification calculations.

No findings were identified.

10.3 Conclusions

Radioactive materials planned for shipment were classified, characterized, and packaged appropriately, in accordance with NRC and DOT requirements.

11.0 **Exit Meeting**

The inspectors presented the results of the inspection to Mr. B. McMahon and other members of the KPS staff at an exit meeting on January 15, 2020. The licensee acknowledged the results presented and did not identify any of the information discussed as proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

B. McMahon, Kewaunee Site Director
D. Shannon, Radiation Protection and Chemistry Manager
T. Olson, Nuclear Operations and Maintenance Manager
W. Zipp, Nuclear Engineering and Technical Support Manager

INSPECTION PROCEDURES USED

IP 36801	Organization and Management Controls at Permanently Shutdown Reactors
IP 37801	Safety Reviews, Design Changes, and Modifications at Permanently Shutdown Reactors
IP 40801	Self-Assessment, Auditing, and Corrective Action at Permanently Shutdown Reactors
IP 60855.1	Operation of an ISFSI at Operating Plants
IP 71801	Decommissioning Performance and Status Reviews at Permanently Shutdown Plants
IP 83750	Occupational Radiation Exposure
IP 83801	Inspection of Remedial and Final Surveys at Permanently Shutdown Reactors
IP 84750	Radioactive Waste Treatment, and Effluent and Environmental Monitoring
IP 85103	Materials Control and Accounting at Decommissioning Reactors
IP 86750	Solid Radioactive Waste Management and Transportation of Radioactive Materials

ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Opened</u>	<u>Type</u>	<u>Summary</u>
---------------	-------------	----------------

None

<u>Closed</u>	<u>Type</u>	<u>Summary</u>
---------------	-------------	----------------

None

PARTIAL LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

- 2018 Annual Radioactive Effluent Release Report
- 2018 Annual Radiological Environmental Operating Report

- Audit 18-09: Kewaunee Power Station, 10 CFR 50 Appendix B Programs; dated 10/16/2018
- Audit 19-02: Emergency Preparedness; dated 04/17/2019
- CR 1783; Detectable Level of Tritium Identified in Groundwater Monitoring Well MW-704; dated 10/02/2018
- CM-KW-400; 10 CFR 50.59 and 10 CFR 72.48 – Changes, Tests, and Experiments; Revision 9
- Decommissioning Funding Status Report. Financial Test and Independent Public Accountants Letter of Attestation; dated 03/28/2019
- Emergency Preparedness Drill Evaluations 2018-2019
- EP-KW-101; 10 CFR 50.54(q) Change Evaluation; Revision 2
- EP-KW-EIP-001; Emergency Response; Revision 3
- EP-KW-EIP-002; Emergency Notifications; Revision 4
- EP-KW-EIP-005; Emergency Radiation Controls; Revision 1
- ETE-NAF-2010-001; Kewaunee ISFSI 10 CFR 72.212 Evaluation Report; Revision 1
- ETE-KW-2015-009; Kewaunee ISFSI 10 CFR 72.212 Evaluation Report for the MAGNASTOR Dry Storage System; Revision 0
- Facility Safety Review Group Meeting Minutes 2018-2019
- Fire Protection Program Analysis; Revision 14
- Fire Protection Program Plan; Revision 18
- FPEE-074; Evaluation of the Fire Protection Program for SAFSTOR 3 Long Term Dormancy; dated 09/27/2018
- Guide 162; Shipment ID No. 1059-C-0007
- ISFSI-Only Emergency Action Level Basis Document; Revision 0
- ISFSI Only Emergency Plan; Revision 0
- ISFSI Radiological Survey Results 2018-2019
- Kewaunee Power Station Radiological Environmental Monitoring Manual; Revision 22
- KW-PROC-ADM-SA-FPP-016; Fire Protection Engineering Evaluations; Revision 0
- Miscellaneous Condition 2019 Reports
- MA-KW-EPM-FP-040A; Linear Fire Control Panel Inspection; Revision 1
- Manifest No. 1059-C-0007; Uniform Low-Level Radioactive Waste Manifest Shipping Paper; dated 09/24/2019
- NO-AA-101; Quality Assurance Program Description Maintenance; Revision 5
- NO-AA-IAP-101; Internal Audit Program; Revision 2
- Nuclear Facility Assurance Program Description; Revision 27
- OP-KW-AOP-GEN-004; Response to Natural Events; Revision 21
- OP-KW-OSP-MI-002; Operating Surveillance Procedure; Revision 15
- OP-KW-OSP-FP-002; Fire Pump Test; Revision 7
- OP-KW-NCL-FP-002; Fire Protection System Seal Checklist; Revision 8
- OP-KW-OSP-FP-001; Fire System Valve Cycling; Revision 7
- OP-KW-MPM-FP-050; Fire Pump B Flow Test; Revision 0
- PI-KW-200; Corrective Action; Revision 13
- Position Paper RP-2016-001 dated 7/6/2016
- Radioactive Material Manifest 2018-09-20-1
- Radioactive Material Packaging Form – Shipment ID No. 2019-09-24-01; 09/12/2019
- Revision to Post-Shutdown Decommissioning Activities Report; dated 04/25/2014
- Sealed Source Inventory; dated 08/15/2019
- Self-Assessments 2018-2019
- Self-Assessment Report: SAR 0140 (CA358/CA140)
- Special Nuclear Material Handling Reports 2017-2019
- Technical Requirements Manual; Revision 74

- TLD Exposure Record Read Results FY 2018
- TSD No. 18-089; Sampling and Analysis Plan for Release of STP and SWPT Lagoons at Kewaunee Nuclear Power Station; Revision 2

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access and Management System
ALARA	As Low As Is Reasonably Achievable
CAP	Corrective Action Program
CFR	Code of Federal Regulations
CoC	Certificate of Compliance
DEK	Dominion Energy Kewaunee
DNMS	Division of Nuclear Materials Safety
DOT	Department of Transportation
IP	Inspection Procedure
ISFSI	Independent Spent Fuel Storage Installation
KPS	Kewaunee Power Station
NRC	U.S. Nuclear Regulatory Commission
ODCM	Offsite Dose Calculation Manual
PSDAR	Post-Shutdown Decommissioning Activities Report
RP	Radiation Protection
RWP	Radiation Work Permit
SAFSTOR	Safe Storage
SNM	Special Nuclear Material
TS	Technical Specification
USAR	Updated Safety Analysis Report