

CONFIDENTIAL COMMERCIAL INFORMATION TO BE WITHHELD FROM PUBLIC  
DISCLOSURE PURSUANT TO 10 CFR 2.390 & 10 CFR 9.17



October 28, 2021

10 CFR 50.80  
10 CFR 50.90  
10 CFR 72.50

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

Serial No.: 21-352  
NRA/SS: R0  
Docket Nos.: 50-305  
72-64  
License No.: DPR-43

**DOMINION ENERGY KEWAUNEE, INC.**  
**KEWAUNEE POWER STATION**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING**  
**APPLICATION FOR ORDER APPROVING TRANSFER OF CONTROL OF**  
**KEWAUNEE POWER STATION LICENSE AND CONFORMING LICENSE**  
**AMENDMENTS**

By letter dated May 10, 2021, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21131A141), Dominion Energy Kewaunee, Inc. ("DEK"), and EnergySolutions, LLC ("EnergySolutions") (together with DEK, the "Applicants") submitted an application requesting that the U.S. Nuclear Regulatory Commission ("NRC") consent to the transfer of control of Renewed Facility Operating License No. DPR-43 ("License") for Kewaunee Power Station (KPS) and the general license for the Kewaunee independent spent fuel storage installation from Dominion Nuclear Projects, Inc. (Dominion), the parent entity of the licensee, to EnergySolutions. This application was supplemented by a letter from EnergySolutions dated May 13, 2021 (ADAMS Accession No. ML21145A083), which provided the proposed Post-Shutdown Decommissioning Activities Report, Revision 2 for KPS.

By letter dated September 30, 2021 (ADAMS Package No. ML21257A062), the NRC issued a request for additional information (RAI) related to the application. The letter requested that a response to the RAI or a written request for additional time to respond, including the proposed response date and a brief description of the reason, be provided within 30 days from the date of the letter. On October 7, 2021, the NRC staff conducted a conference call with the Applicants to clarify the request.

Enclosure 1C of Attachment 1 contains confidential commercial and financial information. EnergySolutions requests that this information be withheld from public disclosure

NOTE: ATTACHMENT 1, ENCLOSURE 1C TO THIS LETTER CONTAINS "CONFIDENTIAL COMMERCIAL INFORMATION" AND MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF ATTACHMENT 1, ENCLOSURE 1C, THIS LETTER IS "DECONTROLLED."

pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 2.390, as described in the Affidavit in Enclosure 1B of Attachment 1.

The response to the RAI, as provided in Attachment 1, is submitted in accordance with 10 CFR 50.4, "Written communications," and has been executed in a signed original document under oath or affirmation pursuant to 10 CFR 50.30(b), "Oath or affirmation." Attachment 2 provides resumes for planned management positions within Kewaunee Solutions, Inc (a subsidiary of EnergySolutions), in support of the response to RAI-4. A new regulatory commitment made in this RAI response is contained in Attachment 3.

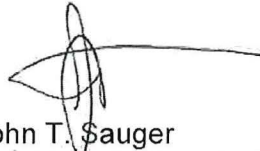
In accordance with 10 CFR 50.91(b)(1), a copy of this submittal has been sent to the State of Wisconsin.

Should you have any questions or require additional information, please contact Craig D. Sly, Manager, Nuclear Feet Licensing (Dominion), at (804) 273-2784.

Sincerely,



Daniel G. Stoddard  
President and Chief Nuclear  
Officer  
Dominion Energy Kewaunee, Inc.



John T. Sauger  
President D&D and Chief Nuclear  
Officer  
EnergySolutions, LLC

Attachments:

1. Response to Request for Additional Information Regarding Application for Order Approving Transfer of Control of Kewaunee Power Station License and Conforming License Amendments
  - Enclosure 1A: Non-Confidential Version of Response
  - Enclosure 1B: Affidavit for Withholding Confidential Information
  - Enclosure 1C: Confidential Version of Response
2. Resumes for Planned Management Positions within Kewaunee Solutions, Inc.
3. List of Regulatory Commitments

cc: w/Enclosures

Mr. Karl Sturzebecher  
NRC Project Manager – Kewaunee Power Station  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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Senior Vice President Regulator Affairs  
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cc: w/o Confidential Financial Enclosure 1C

Manager, Radiation Protection Section  
Wisconsin Department of Health Services

**AFFIRMATION**

I, Daniel G. Stoddard, state that I am the President and Chief Nuclear Officer of Dominion Energy Kewaunee, Inc. ("DEK") and that I am duly authorized to execute and file this application on behalf of DEK. To the best of my knowledge and belief, the statements contained in this document with respect to DEK are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by employees and/or consultants of the company. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

I declare under penalty of perjury that the foregoing is true and correct:

Executed on October 28, 2021.

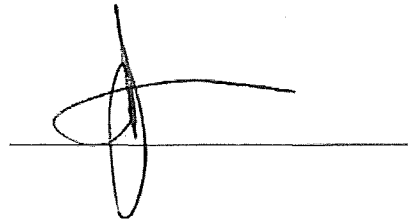
Dan Stoddard

**AFFIRMATION**

I, John T. Sauger, state that I am the President D&D and Chief Nuclear Officer of EnergySolutions, LLC ("EnergySolutions") and that I am duly authorized to execute and file this application on behalf of EnergySolutions. To the best of my knowledge and belief, the statements contained in this document with respect to EnergySolutions are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by employees and/or consultants of the company. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

I declare under penalty of perjury that the foregoing is true and correct:

Executed on October 28, 2021.

A handwritten signature, appearing to be "John T. Sauger", is written in black ink over a horizontal line. The signature is stylized, with a large loop and a long horizontal stroke extending to the right.

**ATTACHMENT 1**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**  
**REGARDING APPLICATION FOR ORDER APPROVING TRANSFER OF**  
**CONTROL OF KEWAUNEE POWER STATION LICENSE AND**  
**CONFORMING LICENSE AMENDMENTS**

**Kewaunee Power Station**  
**Dominion Energy Kewaunee, Inc.**

**EnergySolutions, LLC**

NOTE: ATTACHMENT 1, ENCLOSURE 1C CONTAINS "CONFIDENTIAL COMMERCIAL INFORMATION" AND MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF ENCLOSURE 1C OF ATTACHMENT 1, THIS ATTACHMENT IS "DECONTROLLED."

Serial No. 21-352  
Docket Nos. 50-305/72-64

**ENCLOSURE 1A**

**NON-CONFIDENTIAL VERSION OF RESPONSE**

**Kewaunee Power Station  
Dominion Energy Kewaunee, Inc.**

**Energy*Solutions*, LLC**



By letter dated May 10, 2021, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21131A141), Dominion Energy Kewaunee, Inc. ("DEK"), and EnergySolutions, LLC ("EnergySolutions") (together with DEK, the "Applicants") submitted an application requesting that the U.S. Nuclear Regulatory Commission ("NRC") consent to the transfer of control of Renewed Facility Operating License No. DPR-43 ("License") for Kewaunee Power Station (KPS) and the general license for the Kewaunee independent spent fuel storage installation (ISFSI) from Dominion Nuclear Projects, Inc. (Dominion), the parent entity of the licensee, to EnergySolutions. This application was supplemented by a letter from EnergySolutions dated May 13, 2021 (ADAMS Accession No. ML21145A083), which provided the proposed Post-Shutdown Decommissioning Activities Report (PSDAR), Revision 2 for KPS.

By letter dated September 30, 2021, the NRC issued a request for additional information (RAI) related to the application. The letter requested that a response to the RAI or a written request for additional time to respond, including the proposed response date and a brief description of the reason, be provided within 30 days from the date of the letter. On October 7, 2021, the NRC staff conducted a conference call with the Applicants to clarify the request.

The non-confidential version of the response to the RAI are provided in this attachment.

### **Financial RAIs**

*The NRC's regulations at Title 10 of the Code of Federal Regulations (10 CFR) 50.80 and 72.50 state that no license, or any right thereunder, shall be transferred, directly or indirectly, through transfer of control of the license, unless the Commission gives its consent in writing. The regulation at 10 CFR 50.80(c) states, in part, that "the Commission will approve an application for the transfer of a license, if the Commission determines: (1) That the proposed transferee is qualified to be the holder of the License; and (2) That the transfer of the license is otherwise consistent with applicable provisions of law, regulations, and orders issued by the Commission pursuant thereto."*

*The regulation at 10 CFR 50.33(f) requires that an application for a license to operate a utilization facility provide "information sufficient to demonstrate to the Commission the financial qualification of the applicant to carry out, in accordance with regulations in this chapter, the activities for which the permit or license is sought." The regulation further states that, as applicable, the following should be provided:*

*(4) Each application for a[n] . . . operating license . . . submitted by a newly-formed entity organized for the primary purpose of constructing and/or operating a facility must also include information showing:*

- (i) *The legal and financial relationships it has or proposes to have with its stockholders or owners;*
- (ii) *The stockholders' or owners' financial ability to meet any contractual obligation to the entity which they have incurred or proposed to incur; and*
- (iii) *Any other information considered necessary by the Commission to enable it to determine the applicant's financial qualification.*

*(5) The Commission may request an established entity or newly-formed entity to submit additional or more detailed information respecting its financial arrangements and status of funds if the Commission considers this information appropriate. This may include information regarding a licensee's ability to continue the conduct of the activities authorized by the license and to decommission the facility.*

*In addition to requirements in 10 CFR Part 50, certain regulations in 10 CFR Part 72 apply to a generally licensed ISFSI, as listed in 10 CFR 72.13(c), including 10 CFR 72.30(b)–(f); that regulation includes provisions for demonstration of financial assurance for decommissioning of a generally licensed ISFSI.*

*RAI-1 (Contingency)*

*NUREG-1757, Vol. 3, Rev. 1, "Consolidated Decommissioning Guidance" (ADAMS Accession No. ML12048A683), states, in part:*

*In general, a contingency of 25 percent applied to the sum of all estimated decommissioning costs should be adequate, but in some cases a higher contingency may be appropriate. The 25 percent contingency factor provides reasonable assurance for unforeseen circumstances that could increase decommissioning costs and should not be reduced or eliminated simply because foreseeable costs are low. Proposals to apply the contingency only to selected components of the cost estimate, or to apply a contingency lower than 25 percent, should be approved only in circumstances when a case-specific review has determined that there is an extremely low likelihood of unforeseen increases in the decommissioning costs....*

*Accordingly, the NRC staff requests additional information regarding the reason for including a lower contingency amount than suggested. The staff could not find a justification of why the decommissioning cost estimate did not meet the recommended 25 percent contingency. Provide, for NRC staff consideration, a justification for using less than the recommended 25 percent contingency for the cost of decommissioning Kewaunee.*

Response to RAI-1

Section 1.1 of NUREG-1757, Vol. 3, ("Purpose and Applicability,") states:

This volume does not apply to licensees under 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities." Regulatory Guide 1.159, Revision 1, "Assuring the Availability of Funds for Decommissioning Nuclear Reactors," issued October 2003, provides guidance on financial assurance for these licensees.

Based on this excerpt, the referenced guidance (NUREG-1757 Vol. 3, Rev. 1) is not considered directly applicable. Regulatory Guide 1.159, Revision 1 does recommend contingency for unexpected costs, but it does not recommend 25% or any other specific percentage of contingency.

The following considerations limit the likelihood of unforeseen increases in decommissioning costs:

License Termination:

1. *EnergySolutions* performed site-specific quantity evaluations for KPS and compared KPS to other *EnergySolutions* projects (including historical data) to estimate the volume of contaminated material at the site. Contaminated material includes surface and subsurface soil material, buildings and building materials, and equipment containing residual radioactivity. The contaminated material will require remediation to meet the criteria for license termination. Based on the estimates and comparisons, the potential for underestimating the volume of material and cost to remediate that material is decreased.
2. *EnergySolutions* has provided services to decommissioning projects similar to Kewaunee, which enhances their ability to estimate radioactive waste volumes. *EnergySolutions* also owns Low-Level Radioactive Waste (LLRW) disposal sites. *EnergySolutions'* experience providing direct decommissioning services and the capability to directly dispose of LLRW for KPS eliminates third-party schedule delays, therefore reducing the potential for unforeseen increases in waste burial costs, which are typically one of the largest components of decommissioning costs.

Spent Fuel Management:

3. Many decommissioning projects that typically can incur large unforeseen costs have already been completed at KPS, thereby reducing cost uncertainties. These include (a) all irradiated nuclear fuel has been removed from the spent fuel pool and the pool storage racks have been disposed of offsite; (b) the KPS physical security plan footprint has been reduced to the ISFSI pad area; and (c) the emergency plan footprint has been reduced to the ISFSI pad area, including elimination of requirements for offsite emergency response. The cost uncertainties

associated with completion of these projects have been eliminated as the projects have been completed.

#### Site Restoration:

4. Site Restoration, or greenfield activities, includes the demolition of radiologically clean buildings and site structures, placement of clean fill materials, and completion of grading and re-vegetation of the site. Site Restoration work has lower potential for unforeseen cost increases when compared to License Termination, thus allowing for lower contingencies.

In conclusion, the potential for unforeseen cost increases is reduced by the current site-specific condition of the facility, EnergySolutions' decommissioning experience and ownership of LLRW disposal sites, and the use of historical data for waste volume estimation. Therefore, case-specific circumstances applicable to the PSDAR, Revision 2 cost estimate provide assurance that the contingency amounts are reasonable.

#### RAI-2 (U.S. Department of Energy Breach of Contract)

*In 10 CFR 50.54(bb), the NRC requires, in part, a licensee to submit, for NRC review and preliminary approval, the program by which the licensee intends to manage and provide funding for the management of all spent fuel at the reactor following permanent cessation of operation of the reactor until title to the spent fuel and possession of the spent fuel is transferred to the U.S. Department of Energy (DOE) for its ultimate disposal.*

*Accordingly, the NRC staff requests additional information regarding the proposed DOE reimbursements process and scope that would be relied upon in the site-specific decommissioning cost estimate (SSDCE) for spent fuel management. The staff is unable to reconcile the DOE reimbursements as scheduled and therefore clarification is necessary. Also, provide a more detailed explanation of the DOE reimbursements for breach of the standard contract. In addition, it is not apparent to the staff the source of the numbers in the SSDCE cash flow description. Therefore, provide, for NRC staff consideration, such references.*

#### Response to RAI-2

##### Background:

As shown in the "Sinking Fund Analysis" in PSDAR, Revision 2, Table 1A-2, one source of funds for spent fuel management is the nuclear decommissioning trust (NDT). After accounting for decommissioning requirements, sufficient funds exist in the NDT to support maintenance of the ISFSI and decommissioning activities without reliance on DOE reimbursement through partial site release and up through January 1, 2031. Reliance on the KPS NDT to support spent fuel management activities through this period is consistent with an exemption issued by the NRC to DEK on May 21, 2014 (ADAMS Accession No. ML13337A287).

For the period between partial site release and decommissioning of the ISFSI (2031-2055), it is anticipated that additional funds will be required for spent fuel management beyond the assets in the NDT. As shown in the Sinking Fund Analysis in Table 1A-2, DOE reimbursements provide additional funding for Spent Fuel Management costs after January 1, 2031.

Pursuant to DOE Contract DE-CR01-83NE44429 ("KPS Standard Contract"), DOE has ultimate responsibility for collection and permanent disposal of the spent nuclear fuel at KPS. As a result of DOE's breach of the KPS Standard Contract, DOE is responsible for the costs related to the current storage of the spent nuclear fuel at the KPS ISFSI. DOE has consistently reimbursed contract holders over the years for these costs through settlement agreements or through litigation.

Given the long and consistent history of Standard Contract spent fuel litigation, the NRC Staff found in the Order Approving the License Transfer Request for Vermont Yankee (ADAMS Accession No. ML18248A096) and other similar License Transfer approvals (ADAMS Accession No. ML19305B131 for Beaver Valley Units 1 & 2, ML20069A027 for Crystal River Unit 3, ML20279A373 for Three Mile Island Unit 2, etc.) "that the assumption of DOE reimbursement is a reasonable source of additional funding. In recent years, DOE reimbursements have become more consistent and predictable despite the longevity of the litigation process and complexity of DOE standard settlement agreements."

RAI-2, part a.

*Accordingly, the NRC staff requests additional information regarding the proposed DOE reimbursements process and scope that would be relied upon in the site-specific decommissioning cost estimate (SSDCE) for spent fuel management. The staff is unable to reconcile the DOE reimbursements as scheduled and therefore clarification is necessary.*

Response to RAI-2, part a.

EnergySolutions has estimated that [ ] of future Spent Fuel Management costs will be reimbursed by DOE. EnergySolutions believes [ ] is realistic and conservative for the following reasons: (i) Spent Fuel Management costs are relatively stable and predictable after, as at KPS, the ISFSI is constructed, and the spent fuel is transferred from the spent fuel pool to dry cask storage on the ISFSI pad; (ii) case law provides important guidance regarding the types of damages recoverable from DOE, establishing that DOE is responsible for reasonable costs of spent fuel storage incurred as a result of DOE's failure to accept spent fuel for disposal (for example, see *Sacramento Municipal Utility District v. United States*, 70 Fed. Cl. 332 (2006); *Yankee Atomic Electric Company v. United States*, Court of Federal Claims Case Number 13-584 C; *Maine Yankee Atomic Power Company v. United States*, Court of Federal Claims Case Number 13-585 C; and *Connecticut Yankee Atomic Power Company v. United States*, Court of Federal Claims

Case Number 13-586 C); and (iii) EnergySolutions consulted with qualified experts experienced in DOE recovery proceedings in order to arrive at a reasonable and conservative recovery percentage considering that spent fuel management costs are stable with all KPS spent fuel in ISFSI storage.

The total DOE Reimbursements of [ ] shown in Table 1A-2 of the PSDAR represent [ ] of the total Spent Fuel Management Costs of \$231,321,000 shown in Table 4-1. The estimated DOE Reimbursement of [ ] in fiscal year 2031 represents [ ] of the total of Spent Fuel Management costs of [ ] estimated for fiscal years 2021 through 2030. However, the NDT is sufficient to cover Decommissioning activities during years 2021-2030 without relying on DOE reimbursement, and therefore DOE reimbursement is not credited during this time. In 2031, the NDT will be reduced to [ ], at which point Kewaunee Solutions will begin to rely on DOE reimbursements to ensure the NDT remains adequately funded to cover spent fuel management costs during the period between 2031 to 2055.

Footnote C in Table 1A-2 of the PSDAR, Revision 2 states that credit for DOE reimbursements starts in 2031. Though not explicitly stated, Table 1A-2 additionally assumes an [ ] reimbursement rate from DOE in years 2021-2030, as shown in the Table RAI-2-1 below.

Table RAI-2-1: Annual SFM Costs and Estimated DOE Reimbursement (2021 -2030)

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[

]

The column for DOE reimbursement in Table 1A-2, Sinking Fund Analysis, will be updated in the next revision to the PDSAR to include a footnote for the years 2021- 2030 providing the above explanation.

RAI-2, part b.

*Also, provide a more detailed explanation of the DOE reimbursements for breach of the standard contract.*

Response to RAI-2, part b.

See explanation in “Background” subsection above.

RAI-2, part c.

*In addition, it is not apparent to the staff the source of the numbers in the SSDCE cash flow description. Therefore, provide, for NRC staff consideration, such references.*

Response to RAI-2, part c.

The references for the source of numbers in the SSDCE cash flow description from the Sinking Fund Analysis (Table 1A-2) are provided below:

Beginning Balance NDT

The KPS Sinking Fund Analysis assumes a starting NDT value of \$800M (see footnote A of Table 1A-2) at the closing of the transaction described in the License Transfer Application. The most recent annual decommissioning funding status report made by DEK (ADAMS Accession No. ML21084A800) shows an adjusted fund balance of \$780M as of December 31, 2020. This number was adjusted to \$800M to account for the change to the fund balance as of March 31, 2021. Thereafter, the KPS Sinking Fund Analysis accounts for taxes on unrealized gains, resulting in a beginning balance of approximately \$730M in the NDT upon completion of the transfer of control of KPS to EnergySolutions.

Annual Spending

The decommissioning cost summary is provided in Table 4-1 of the PSDAR, Revision 2. A detailed cost estimate associated with the decommissioning of KPS is provided in

Enclosure 1A, Table 1A-1 "Decommissioning Cost Estimate" (Confidential). The KPS Sinking Fund Analysis (Table 1A-2), Annual Spending column presents the anticipated spending for each fiscal year through 2055 in alignment with the Schedule Information presented in Figure 1A-1 and the Decommissioning Cost Estimate in Table 1A-1.

#### DOE Reimbursements

As explained above, DOE Reimbursements have been estimated at [ ] of the estimated Spent Fuel Management costs. The total DOE Reimbursements shown in Table 1A-2 of [ ] represent [ ] of the Total Spent Fuel Management Costs shown in PSDAR, Revision 2, Table 4-1 of \$231,321,000. The DOE Reimbursement in fiscal year 2031 of [ ] represents [ ] of Spent Fuel Management costs incurred from fiscal years 2021 through 2030 of [ ] which are shown in the Table RAI-2-1 above.

#### NDT Earnings

NDT Earnings are based on a Real Rate of Return of 2.0%, per 10 CFR 50.75(e)(1)(i), applied to the average of the NDT Beginning Balance, and the NDT Ending Balance less NDT Earnings (Beginning Balance NDT less Annual Spending plus DOE Reimbursements).

#### Ending Balance NDT

The NDT Ending Balance is equal to the NDT Beginning Balance less Annual Spending plus DOE reimbursements plus NDT Earnings.

#### Technical RAIs

*As part of its technical review, the NRC staff uses the guidance in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition," Chapter 13, "Conduct of Operations," Section 13.1.1, Revision 6, "Management and Technical Support Organization" (ADAMS Accession No. ML15005A449), and Sections 13.1.2 - 13.1.3, Revision 7, "Operating Organizations" (ADAMS Accession No. ML15007A296); Regulatory Guide 1.8, Revision 4, "Qualification and Training of Personnel for Nuclear Power Plants" (ADAMS Accession No. ML19101A395); and American Nuclear Society / American National Standards Institute (ANSI/ANS) 3.1-2014, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants."*

#### RAI-3 (Specific Provisions)

*As per NUREG-0800, Section 13.1.1, paragraph I.4.c, the description of the specific provisions which have been made for uninterrupted technical support for operations should be part of the description of the organization for a license transfer application.*



*In the Kewaunee Post-Shutdown Decommissioning Activities Report, Revision 2, attached to the supplemental letter dated May 13, 2021, the Dominion spent fuel management plan is identified and described on page 5. However, it is unclear whether EnergySolutions intends to follow this plan following the consummation of the proposed license transfer transaction. Accordingly, describe EnergySolutions' commitment to the existing Dominion spent fuel management plan identified on page 5 and whether EnergySolutions has any specific changes in activities, timing of the implementation, and updates to the original plan. Provide any supporting analyses and evaluations, as appropriate.*

### Response to RAI-3

PSDAR, Revision 2, Section II.C, "Spent Fuel Management," states that spent fuel maintained at KPS is located in the ISFSI and will remain there until acceptance by the DOE, consistent with the current DEK Irradiated Fuel Management Plan (IFMP). PSDAR, Revision 2 discusses changes to the timeline for DOE acceptance of spent fuel and points to Section III of the PSDAR for schedule updates. PSDAR, Revision 2 now predicts that DOE will start accepting spent fuel in 2050 as opposed to the previously predicted date of 2021. As a result of the change to the DOE acceptance schedule, the funds required to maintain the ISFSI over this extended period and decommission it thereafter, and the source of funds for spent fuel management, must also be updated to reflect the predicted 2050 acceptance date.

EnergySolutions commits to providing an updated IFMP, in accordance with 10 CFR 50.54(bb), within 90 days after license transfer (see Regulatory Commitment in Attachment 3 of this RAI response letter). The updated IFMP will include the projected cost and schedule for managing spent fuel, and will reflect the adjustments that will occur as a result of EnergySolutions becoming the licensee.

### RAI-4 (Technical Qualifications)

*More information is needed to determine the technical qualifications of the proposed transferee, as required under 10 CFR 50.80. Specifically, further detail on the responsibilities and experience of the on-site dismantlement managers identified in Enclosure 2, "Pre-Closing and Post-Closing Organizational Charts," of the application is needed to determine the qualifications of the persons who will be filling those positions.*

*The Applicants provided the resumes for some of the planned positions identified in Figure 2.3, "Kewaunee Solutions, Inc. Organization," in Enclosure 2 of the application. However, the resumes were not provided for the following planned management positions identified in Figure 2.3: Radiation Protection Manager, Licensing Manager, Engineering Manager, Safety Manager, and Quality Assurance Manager. Accordingly, provide the resumes for the individuals that are proposed to fill these positions that have not yet been provided so that the NRC staff will be able to complete its determination of whether the proposed transferee is technical qualified to be the holder of the license.*

Response to RAI-4

Resumés showing the qualifications and experience of Managers presented in Figure 2.3 are included in Attachment 2 of this RAI response letter. Specifically, resumes are provided for the following individuals:

- David Villicana, Radiation Protection Manager
- Pamela Fergen, Licensing Manager
- Todd Eiler, Engineering Manager
- Keith Moss, Safety Manager
- Anthony Bejma, Quality Assurance Manager

Furthermore, these individuals meet the qualifications committed to in Appendix D, Section 3.1 of the Kewaunee Solutions Decommissioning Quality Assurance Plan submitted on October 4, 2021 (ADAMS Accession No. ML21277A246):

Facility staff responsible for the safe storage of nuclear fuel and selected decommissioning activities shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions as defined in approved procedures except for the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

RAI-5 (Technical Support)

*NUREG-0800, Section 13.1.1 and Sections 13.1.2 - 13.1.3 indicate that the objective of a review of license transfers under 10 CFR 50.80 is to ensure that the corporate management is involved with, informed of, and dedicated to the safe decommissioning of the plant. In addition, the review is to ensure that sufficient technical resources will be provided to adequately accomplish this objective and that there are sufficient interface arrangements and controls between the applicant and the major support organizations that the applicant will be responsible for and oversee.*

*More information is needed to evaluate any proposed changes to the current technical organization that would result from the proposed transfer and to evaluate the supporting technical resources that would be used for the decommissioning operations provided that the transfer is approved.*

*Accordingly, describe the difference between the current Dominion organizational structure for Kewaunee and that of the proposed organization after the consummation of the proposed transaction. If a function under the current organization will not be carried over to the proposed organization, explain why. Identify if there are any planned support agreements between Dominion post-Closing and EnergySolutions' strategic partners and how they fit into the planned Kewaunee Solutions organization chart in Enclosure 2 of the application. Also, identify if these supporting organizations would provide support to operations at the site. If so, identify where they would provide support in the organization*

*and also identify the lines of communication and authority that these supporting organization would have in the overall proposed transferee's organization.*

Response to RAI-5

See Dominion Support Agreement Organizational Chart in Figure RAI-5-1.

The existing DEK site employees will be retained at the site, as Dominion Energy employees. Dominion Energy and EnergySolutions have developed three support agreements (see Enclosure 1B of License Transfer Application) to ensure the technical functions are carried over post-Closing. The three agreements are 1) ISFSI Management Services Agreement, 2) D&D Site Consulting Agreement, and 3) Transition Services Agreement. Per the ISFSI Management Services Agreement, these employees will manage the ISFSI for the Licensee. Per the D&D Site Consulting Agreement, DEK site employees will support and consult on the D&D activities, as needed, including historical site assessments, fire protection, operations, etc. The Transition Services Agreement ensures that the required records will be transferred and that information technology functions are retained. These support agreements are intended to ensure the previously performed Protection Services (Security), Operation & Maintenance, Engineering, and Radiation Protection & Chemistry functions are maintained at the ISFSI. The agreements also support continued compliance with the applicable regulatory requirements (Emergency Planning, Access Authorization, Records Retention, etc.). The existing DEK employees will continue to perform their duties in substantially the same manner as during the twelve (12) month period immediately preceding the date of License Transfer, and for a minimum of eight years after the License Transfer.

The agreements will be managed by the Kewaunee Solutions Project Director through direct lines of communication with the Dominion Energy Kewaunee Site Director.

Beyond the support agreements between EnergySolutions and Dominion Energy, there are no planned strategic partners or subcontractors that will be in decision-making roles.

### Dominion Energy Support Agreement Organizational Chart

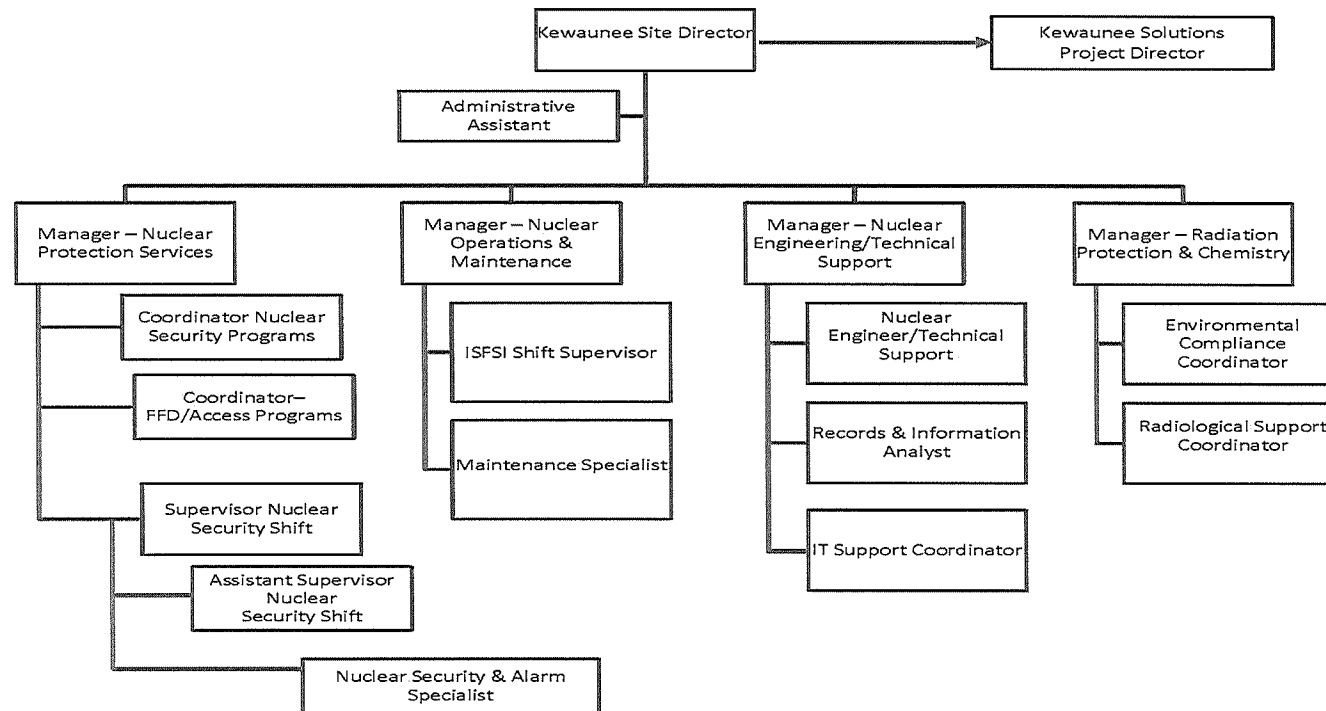


Figure RAI-5-1: Dominion Support Agreement Organizational Chart

**ENCLOSURE 1B**

**AFFIDAVIT FOR WITHHOLDING CONFIDENTIAL INFORMATION**

**Kewaunee Power Station  
Dominion Energy Kewaunee, Inc.**

***EnergySolutions, LLC***

**10 CFR 2.390**  
**AFFIDAVIT OF RUSSELL G. WORKMAN**

I, Russell G. Workman, General Counsel and Secretary of *EnergySolutions*, LLC. (“*EnergySolutions*”), state that:

1. I am authorized to execute this affidavit on behalf of *EnergySolutions*.
2. *EnergySolutions* is providing information in support of the above-described, “Response to Request for Additional Information Regarding Application for Order Approving Transfer of Control of Kewaunee Power Station License and Conforming License Amendments.” Enclosure 1C of the Application contains trade secrets and financial information, including proprietary aspects to the decommissioning of Kewaunee Power Station (“KPS”), which constitute proprietary commercial and financial information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4), because:
  - a. This information is and has been held in confidence by *EnergySolutions* and its affiliates.
  - b. This information is of a type that is held in confidence by *EnergySolutions* and its affiliates, and there is a rational basis for doing so because the information contains sensitive trade secret or financial information concerning the decommissioning approach offered by *EnergySolutions* for KPS, as well as the terms of the purchase of Dominion Energy Kewaunee, Inc. by *EnergySolutions*.
  - c. This information is being transmitted to the NRC in confidence.
  - d. This information is not available in public sources and could not be gathered readily from other publicly available information.
  - e. Public disclosure of this information would create substantial harm to the competitive position of *EnergySolutions* and its affiliates by disclosing the terms of a unique transaction to other parties whose commercial interests may be averse to those of *EnergySolutions*.

3. Accordingly, EnergySolutions requests that Enclosure 1C to the "Response to Request for Additional Information Regarding Application for Order Approving Transfer of Control of Kewaunee Power Station License and Conforming License Amendments" be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4) and 9.17(a)(4).

EnergySolutions, LLC



Russel G. Workman  
General Counsel and Secretary

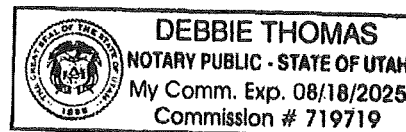
STATE OF UTAH

COUNTY OF SALT LAKE

Subscribed and sworn to me, a Notary Public, in and for the County and State above named, this 25<sup>th</sup> day of Oct., 2021.



My Commission Expires: 8/18/2025



**ATTACHMENT 2**

**RESUMES FOR PLANNED MANAGEMENT POSITIONS WITHIN**  
**KEWAUNEE SOLUTIONS, INC.**

**Kewaunee Power Station**  
**Dominion Energy Kewaunee, Inc.**

**EnergySolutions, LLC**





## **DAVID VILLICANA**

### **Radiation Protection Manager**

#### **Experience Summary:**

Over thirty years' experience working as a Radiation Protection Professional, with a current position of Radiation Protection Manager, and Training Manager. National Registry of Radiation Protection Technologists (NRRPT) registered and certified as a Project Manager Professional. Past assignments include Emergency Plan Manager, Radiation Protection (RP) Manager, Radiation Protection Supervisor over dry fuel storage and containment decommissioning, ALARA Project Manager - CANDU, ALARA Manager, General Supervisor over ALARA and RP Operations, INPO Certified RP Instructor, Radiological Engineer, RP Instrument Supervisor and RP Technician. Experience: BWR, PWR, PWRH (CANDU) plants and plant decommissioning projects. Overall strengths are Change Agent, Analyst, Planner, and implementation with a strong capability to lead others.

#### **Education & Certifications:**

##### **University of St Francis**

- Master of Science in Training and Development

##### **Siena Heights University**

- Bachelor of Applied Science, Computer Information System

##### **Certifications and Training**

- Certified as a Project Management Professional (PMP)
- Registered Radiation Protection Technician with the National Registry of Radiation Protection Technologists (NRRPT)
- Oak Ridge Associated Universities (ORAU) Applied Health Physics Training - ORAU Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) Training

#### **Military:**

##### **United States Marine Corps (Active Duty/Reserve)**

- Rank - Sergeant

##### **United States Air Force (Reserve)**

- Rank - Staff Sergeant

#### **Employment History:**

##### **March 2016 to Present (2021)**

##### **EnergySolutions**

##### **Radiation Protection Manager / Training Manager/ Waste Manager**

Zion /TMI-2 / Kewaunee

- Radiation Protection Manager responsibility for Zion decommissioning
- Training Manager responsibility for Zion, TMI-2 and Kewaunee decommissioning projects
- Waste Manager responsibility for Zion
- TMI-2 Risk Manager



- The transition of programs between ZionSolutions and Exelon
- Managed the Radiological Environmental Monitoring Program (REMP), Radiological Effluent Technical Specifications (RETS), Radiological Groundwater Protection Program (RGPP) programs, and RP Projects
- Emergency Preparation (EP) Manager - Facilitate the transition of Emergency Plan Program from Site to ISFSI only
- Manage Open Air Demolition airborne monitoring
- RP and Training Project close out

**March 2015 to March 2016**

**EnergySolutions**

**Radiation Protection Manager**

**La Crosse BWR (LACBWR)**

- Revitalized the Radiation Protection program at LACBWR
- Prepared and transitioned the project from a SAFSTOR site to a D&D site
- Developed RP procedures before going into full decommissions mode.
- Managed and updated radiation protection programs for the client before the license transfer.
- Managed and resolved NRC and ANI issues and concerns
- Worked and oversaw all aspects of the Radiation Protection program.
- Oversaw final cleanup of sumps and tanks containing liquids or sludge

**June 2013 to March 2015**

**EnergySolutions**

**RP Operations Supervisor, Dry Fuel Storage**

**ZionSolutions Restoration Project**

- Developed RP fuel support program
- Prepared RP for Dry Fuel Storage (DFS) Campaign
- Supervised Radiation Protection Technicians (RPTs)
- Lead RP to Interface with Dry Fuel Storage Project
- Oversaw and managed RP shift operations for DFS
- Supervised RP in Greater-Than-Class-C (GTCC) Campaign
- Oversight of Containment Work

**June 2012 to June 2013**

**Bruce Power – Bruce Power Canada**

**ALARA Manager/Project Manager – Bartlett Nuclear Inc. Consultant**

- Reviewed and revised ALARA planning against industry best practices
- Supported ALARA and RP initiatives at Bruce Power
- Developed ALARA strategies for the projects group to initiate in station projects
- Lead Root Cause Investigator for Radiation Protection



**May 2008 to June 2012**

**Palisades Nuclear Plant – Entergy**

**ALARA Manager, Radiological Engineer Outages/ALARA Outage Supervisor**

- Responsibilities included ALARA Outage planning and managing collective radiation exposure (CRE) HIT teams.
- Managed projects with significant CRE impacts
- Developed strategies and optimized RP responses to mitigate CRE for outages and special projects
- Supervised the ALARA program and personnel
- Revamped the ALARA process and plans to follow a project management methodology
- Rebuilt the ALARA program at the station and established ALARA into the work management process.
- Responsible for all outage planning.
- Supported emergency planning organization.
- Developed and instituted the Micro ALARA Plan that reviewed all work to reduce the dose further. The process was accepted into the work management process at Palisades.
- Responsible for training RP staff and site staff.
- Managed the Station ALARA Committee

**January 2007 to May 2008**

**Point Beach Nuclear Plant – Florida Power & Light (FPL)**

**Radiation Protection General Supervisor**

- Oversaw RP supervisors and RPTs – Improved the professional standard of existing supervisors. Guided change and increased technical rigor through the upgrade of processes and procedures changes. Utilized RPTs in Outage HIT teams. This resulted in an overall increase in technical rigor of the RP department.
- Curriculum Review Committee Chairperson for RPT Training program – on arrival at the station, RP line ownership of training was in question. Over the period of a year, line ownership of training was turned around and no longer proved to be a concern for the site. The INPO Accredited Training Visit in February 2008 identified no issues in the RP training program.
- The overall achievement was setting processes in place in the RP organization that dealt with High Radiation Area (HRA)/Locked LHRA violations, which allowed RP to get an INPO category 1 in June of 2009.

**August 2005 to December 2006**

**Nuclear Management Company, Monticello Nuclear Power Plant**

**Senior Technical Instructor**

- Responsible for the Radiation Protection Technician Training Program
- Lead in Fleet RP Training Standardization
- Mentor to the CRC Chair in Conducting CRCs
- Focused Self-Assessment and Root Cause Evaluations
- Promoted to General Supervisor at Point Beach



**May 2005**

**Westinghouse, Prairie Island**

**ALARA Coordinator / Radiological Engineer Steam Generators**

- Oversaw Steam Generator work, to include exposure and contamination control.
- Provided dose reports, attended Station ALARA Committee meetings, and represented Westinghouse in radiological concerns.

**January 2004 to March 2005**

**AmerenUE, Callaway**

**Radiation Chemistry Training Supervisor**

- Developed project plans to manage the program owner's training program.
- Responsible for identifying training needs, performing need analysis, developing training material, scheduling training and instructing in the classroom. Solicited the program owner on performance deficiencies to be corrected using training.
- Facilitated job analysis, created new task analysis, updated qualifications, and lesson plan material.

**September 2003 to October 2003**

**Venture - Newberg/Perini Stone and Webster, Morris IL**

**ALARA Coordinator / Radiological Engineer**

- Outage Support

**January 2003 to February 2003**

**Bartlett Nuclear, Quad Cities**

**Radiological Engineer / Consultant**

- Developed a white paper identifying stellite components within the plant system with recommendations to mitigate satellite components installation.

**December 2000 to December 2002**

**Exelon, Business Services Company, Chicago, Illinois**

- Training Implementation Coordinator/Quality Assurance for the PassPort Work Management program to transmission and distribution of Commonwealth Edison and EPS to Exelon.

**April 1981 to December 2000**

**Exelon Nuclear, Dresden, Morris, Illinois**

- Radiological Engineer
- First Line Supervisor
- Training Specialist / Instructional Technologist
- Radiation Protection Instrument Supervisor
- Robotics and Remote Technology/ALARA Engineer
- Radiation Protection Technician



## **PAMELA FERGEN, PH.D.**

### **Licensing Manager**

Licensing Engineer/Project Manager with 16 years of experience providing support in areas of nuclear training, mechanical engineering, regulatory programs, and licensing document development, reviews, and submittals. Licensing expertise has been provided in support of nuclear operations, new build, and decommissioning.

### **Education & Certifications:**

#### **Ph.D. in Mechanical Engineering,**

- Old Dominion University, Norfolk, VA

#### **B.S. in Mechanical Engineering**

- Old Dominion University, Norfolk, VA

### **Employment History:**

#### **2019- Present (2021)**

##### **EnergySolutions**

##### **Nuclear Licensing Manager**

Corporate Licensing Manager/LaCrosseSolutions Licensing Manager:

- Perform corporate D&D licensing manager functions including:
  - Procedure development and review (e.g., TMI-2 D&D procedures)
  - Regulatory correspondence (e.g., prepare and review regulatory correspondence for decommissioning sites)
  - Functional area manager support (e.g., licensing lead for Final Status Survey Final Reports produced by the radiation protection group)
  - Act as the Licensing Manager for LaCrosseSolutions.
  - Serve as a member of the Project Operations Review Committee

#### **2018- 2019**

**Southern Nuclear Company**, contract position with E-Group

##### **Licensing Engineer, Senior Consultant**

Licensing Engineer for Vogtle Units 3&4:

- Prepared and reviewed license amendment requests and exemptions, including first of a kind requests to transfer operator exam pass letters and credit tests completed at the first AP1000 site(s)
- Acted as the licensing lead for the training department and the Fukushima project group; duties including consulting activities and preparation of licensing document change requests
- Acted as the licensing lead for Cyber Security initiatives; responsibilities included facilitating inspection planning meetings, preparing and reviewing licensing basis changes to the cyber security plan, and interacting with the regulator



#### **2017- 2018**

**NuScale**, contract position with Enercon

##### **Licensing Engineer/Project Manager, Senior Consultant**

Licensing Engineer for Small Modular Reactor (SMR) Project:

- Developed Combined Operating License (COL) action items; facilitated reviews of COL items, by Subject Matter Experts (SMEs) and managers, following research of regulation and precedence; presented findings to program owners and project managers
- Identified technical deliverables necessary to support COL applicant

#### **2015- 2017**

**South Carolina Electric & Gas (SCE&G)**, contract position with ATR

##### **Licensing Engineer/Project Manager, Senior Consultant**

Licensing Engineer for SCANA Units 2&3:

- Project Manager responsible for coordinating reviews and approvals of licensing change packages; act as the liaison between SCE&G and Westinghouse
- Ensured design change packages were properly implemented, reviewed revisions to licensing documents
- Reviewed and approved design change packages created by Westinghouse and sites
- Created License Amendment Requests and departure packages

Licensing Engineer for the Fukushima Response Organization:

- Managed VC Summer Diverse & Flexible Mitigation Capability (FLEX) / Spent Fuel Pool Level Instrumentation (SFPLI) audit preparations
- Prepared Fukushima related correspondence including the six-month updates for the FLEX and SFPLI Overall Integrated Plans and the Phase II Staffing Analysis
- Authored the Final Integrated Plan for FLEX for Unit 1

#### **2014- 2015**

**Westinghouse Electric Company**, contract position with System One Licensing Engineer for US AP1000:

##### **Licensing Engineer, Senior Consultant**

- Prepared and verified 50.59 like evaluations and License Amendment Requests for the AP1000; worked with customers to ensure quality products
- Evaluated engineering design changes with respect to regulatory requirements
- Assisted with project management duties, including customer interface and meeting facilitation

#### **2013- 2014**

**Brunswick Steam Electric Plant**, contract position with Sun Technical

##### **Licensing Engineer Consultant**

Licensing Engineer for the Fukushima Response Organization:

- Prepare, review and submit regulatory correspondence related to Fukushima efforts.
- Assisted site leads and project managers to ensure requirements were met and schedules were maintained; participated in site audits and assessments
- Gathered information from industry and NRC correspondence to determine site requirements; tracked commitments
- Reviewed engineering documents produced by internal organization and vendors
- Interfaced with NRC on all matters related to Fukushima



**2012- 2013**

**URS**

**Mechanical/Project Engineer**

Mechanical Engineer in URS's Energy and Construction Group:

- Prepared, reviewed and verified System Design Descriptions, Piping & Instrumentation Diagrams and Data Sheets for PWR systems

**2009- 2012**

**Progress Energy**

**Senior Licensing and Regulatory Programs Engineer/Instructor**

Senior Licensing and Regulatory Programs Engineer at Robinson Nuclear Plant:

- Completed 10 CFR 50.59 training and USA Regulatory Affairs Training and Qualification offered by Certrec Corporation
- Wrote regulatory correspondence including Licensee Event Reports, Event Notification Worksheets, Nuclear Regulatory Commission Bulletin responses and program submissions
- Performed Reportability worksheets, process licensing document changes, conduct self-assessments. Interacted with Resident Inspectors. Coordinated inspection activity.
- Acted as the INPO coordinator and submitted the nuclear plant's monthly performance indicator data through INPO's Consolidated Data Entry

Senior Instructor at a nuclear power plant:

- Qualified as an instructor using the Systematic Approach to Training (SAT) and Analysis, Design, Development, Implementation and Evaluation (ADDIE) processes. Conducted training audits and investigations.
- Prepared lesson plans and taught fundamental classes to auxiliary operators

**2008- 2009**

**Callidus Technologies by Honeywell**

**Senior Mechanical Engineer**

Design engineer within the thermal oxidizer group of a combustion equipment company:

- Used Advanced Pressure Vessel Software to design pressure vessels
- Introduced standardization techniques to improve efficiency; implemented changes

**2004- 2008**

**Naval Nuclear Power Training Command**

**Instructor/Program Manager**

Instructor at Naval Nuclear Power Training Command. Primary duty as instructor for Enlisted Mathematics and Chemistry/ Material Science/ Radiological Fundamentals. Used ADDIE/SAT process. Also served as Command Managed Equal Opportunity (EO) Officer:

- Instructed students in various course; prepared lessons and exam modification; counseled students and conducted study sessions
- Studied the effectiveness of Nuclear Power School's Math modules; audited programs and procedures; determined a correlation between student success and module usage; results were used to implement a student study plan
- Revamped the command managed equal opportunity program; revised student and staff indoctrination training leading to a reduction in EO complaints



**2001- 2002**

**M&G Electronics**

**Mechanical Supervisor/Project Manager**

Directed assembly of all panel prototypes and samples. Interfaced with project engineers, buyers, sales department and inventory personnel. Responsible for approval of new parts:

- Supervised 12 personnel in the production of prototypes
- Developed and implemented a scheduling and planning technique to increase productivity and meet and/or exceed customer deadlines

**2000- 2001**

**John Deere**

**Project Manager/Engineer**

Project responsibility for the complete renovation of the Engineering Department. Project Manager with tasks including design, scheduling, budgeting and managing of personnel:

- Planned and managed all aspects of a building renovation; supervised company maintenance personnel as well as department contractors on site
- Improved department lighting, heating and air conditioning; incorporated ergonomic work areas and designed a more efficient office layout





## **TODD EILER, PE, PMP**

### **Engineering Manager**

#### **Experience Summary:**

Mr. Eiler provides more than 14 years of engineering and project management experience in the nuclear industry with an extensive background in civil and structural engineering, and construction management.

#### **Education & Professional Affiliations:**

- B.S., Civil Engineering, Cal Poly San Luis Obispo, 2005
- M.S., Civil Engineering, Virginia Tech, 2007
- Professional Engineer (Civil), NC, FL
- Project Management Professional (PMP)
- ASCE/SEI, PMI

#### **Employment History:**

##### **2017 to Present (2021)**

##### **EnergySolutions**

##### **Director – Engineering & Projects**

- Zion D&D General Manager
- Responsible for developing, maintaining and executing the D&D Division's engineering program and procedures. Provides support to SONGS, TMI-2, Zion, La Crosse, Fort Calhoun and other decommissioning projects.
- Successfully directed over a dozen projects with revenue approaching \$100M, without a single lost-time accident. Signature projects include:
  - SONGS U1 Reactor Pressure Vessel (RPV) transport and disposal
  - Fort Calhoun Large Components (2 Steam Generators, Reactor Head, Pressurizer)
  - Surry Rotor Casings (1.8M pounds)

##### **2014-2020**

##### **Nustruc PLLC**

##### **President**

##### **Prairie Island & Fort Calhoun FLEX Buildings**

- Supported PFES, LLC in the role of structural engineer for the following projects: Prairie Island FLEX Building, Fort Calhoun FLEX building. Served as Project Manager for a coal ash investigation at Duke Marshall Steam Station using Frequency Domain Electromagnetic technology.

##### **Catawba and Oconee FLEX Building**

- Served as Civil / Structural Task Manager at Duke Energy's Catawba and Oconee Nuclear Power Plants during construction of their FLEX storage buildings for SGT, LLC.
  - China CPR-1000 New Build Support
  - US AP-1000 New Build Support
  - Calvert Cliffs Engineering Support



**2014-2015**

**Southern California Edison, SONGS (Wachs)**

**Task Manager**

- Organized, managed, coordinated and oversaw the refurbishment of the K-10/20/20 building for use by Major Projects during the decommissioning of SONGS. Completed this project on-time and 30% under budget using union labor.
- Integral team member for development and review of RFP and bid selection process for \$70M Cold and Dark project. Developed independent resource loaded level 3 schedule to compare to bidders.
- Reviewed numerous civil and structural engineering documents for conformance and feasibility.

**2013-2014**

**Westinghouse, Cranberry, PA**

**Structural Engineer**

- Provided structural and mechanical engineering assistance in support of eight (8) AP-1000 nuclear power plants in the US and China.
- Worked extensively to ASME Boiler & Pressure Vessel Code (BPVC) Section III regarding welding and fabrication issues related to the AP-1000 containment vessel.
- Field support was provided remotely and revolved around responses to Requests for Information (RFIs), Non-Conformance Reports (NCRs), Field Change Requests and other emergent issues.

**2011-2013**

**Areva**

**Structural Engineer**

**TVA Sequoyah Unit 2 Steam Generator Replacement Project**

- Served as Resident Structural Engineer. Developed safety related mix design for containment opening, acting field engineer for outside lift system foundation, concrete roof superstructure frame, reactor containment reinforcing and bar-lock installation and oversaw safety-related concrete placement of containment opening. Structural engineer for large reinforced concrete containment structure to house irradiated steam generators.

**AREVA U.S. EPR Design Certification**

- Supported AREVA with their U.S. EPR 1600 MWe design in the role of structural engineer in support of the license application. Designed large floor slabs in accordance with ACI 349 and verified calculations of fuel pool walls.

**2007-2011**

**Bechtel**

**Structural Engineer**

- Supported Bechtel at multiple projects in various roles.
  - A key accomplishment was developing calculations in support of Yucca Mountain License Application to the NRC. Developed finite element models, performed linear, non-linear, pushover analyses. etc.
  - Field Engineer for SONGS U-3 Steam Generator Replacement Project (SGRP) and Florida Power & Light (FP&L) St. Lucie Extended Power Uprate (EPU) projects. Designed, procured and lead installations of multiple steel structures.



- Construction engineer for Radiological Laboratory Utility Office Building (RLOUB) facility at Los Alamos National Laboratory. Lead the installation of the seismic bracing supports for the mechanical, electrical systems of the facility.



## **KEITH MOSS**

### **Safety Manager**

#### **Experience Summary:**

Environmental, Health, and Safety Management Professional with global experience in new build Engineering, Procurement & Construction (EPC), operations, maintenance, and decommissioning projects. Experience covers nuclear, fossil, hydro, solar, combined cycle, simple cycle, cogeneration, alternative fuel, transmission/distribution, chemical, oil & gas, manufacturing projects and fixed facilities. Experienced and able to build and lead teams in project development, front end planning, program development and execution of domestic and international EPC projects. Successfully worked with organizational team members to implement Zero Injury techniques and improve the culture of safety within various organizations.

#### **Education & Professional Affiliations:**

- B.S., Occupational Safety & Health, Columbia Southern University, Orange Beach, AL
- Board of Certified Safety Professionals - Certified Safety Professional #22482
- American Society of Safety Professionals – Professional Member
- American Nuclear Society
- Nuclear Industrial Safety & Health Association – Associate Member

#### **Employment History:**

##### **April 2017 to Present (2021)**

###### **EnergySolutions**

**Corporate Health & Safety Director**, Nuclear Waste Services, Decommissioning & Demolition Health, Safety & Environmental (HSE) Director for global Nuclear D&D/Waste Management organization. Responsible for HSE program development and implementation globally. Focus on personnel safety, injury prevention, human performance improvement, environmental protection, medical services, OCIP/CCIP participation and management, industrial hygiene, leading indicator metrics, auditing, emergency response, fitness for duty, worker training and qualification.

##### **March 2014 to March 2017**

###### **Flour**

###### **Power, HSE Director**

HSE Director for Power Division, which includes EPC Power Construction domestic and international projects, Power Maintenance group, Nuclear and Renewable Energy Sectors. Responsible for HSE program development and implementation for the power group globally. Focusing on the areas of personnel safety, injury prevention, environmental protection, medical services, Owner Controlled Insurance Program (OCIP)/Contractor Controlled Insurance Program (CCIP) participation and management, industrial hygiene, leading indicator metrics, auditing, emergency response, fitness for duty, worker training and qualification.



**June 2013 to May 2014**

**Chicago Bridge & Iron**

**Plant Services, HSE Director**

HSE Director for Plant Services, Power Maintenance group. Responsible for HSE program implementation for Fossil and Nuclear power generation facilities across the US. Focused on the areas of personnel safety, injury prevention, environmental protection, medical services, OCIP participation and management, industrial hygiene, leading metrics, auditing, emergency response, fitness for duty, worker training and qualification.

**February 2012 to June 2013**

**Mitsubishi Nuclear Energy Systems**

**Power, Corporate ES&H Director**

Environment, Safety & Health (ES&H) Director for nuclear new build division of Mitsubishi Heavy Industries. Responsible for ES&H program development and implementation for their first US based new nuclear construction projects. Developed ES&H process manual, established program for human performance, Safety Conscious Work Environment (SCWE) program, nuclear safety culture, injury prevention, environmental protection, medical services, industrial hygiene, leading metrics, auditing, emergency response, fitness for duty, worker training and qualification.

**November 2008 to January 2012**

**The Shaw Group**

**Power, ES&H Director – Nuclear New Build**

ES&H Director for Nuclear Division of Shaw's Power Group. Responsible for ES&H program development and implementation for first two US based new nuclear construction projects in over 20 years. Focusing on the areas of personnel safety, injury prevention, environmental protection, medical services, OCIP management, industrial hygiene, leading metrics, auditing, emergency response, fitness for duty, worker training and qualification.

**November 2004 – November 2008**

**Southern Company**

**Power, Construction Services ES& Manager**

Construction Services division ES&H Manager responsible for the development and administration of environmental, safety and health program that encompassed new generation projects, (combined cycle and simple cycle), environmental upgrades, retrofit and new generation projects for operating companies across the Southeastern region. Responsible for the placement and development of safety professionals to support project needs, contractor selection and contract safety management programs for generation projects.

**May 1996 to November 2004**

**Fluor Constructors International, Inc**

**HSE Manager**

Manage Health, Safety and Environment department and administer the corporate safety programs for new build EPC projects. This included actual development of site-specific safety manuals and training program based upon the projects schedule, OSHA and EPA regulations. Assessed accident investigations to include root cause analysis and safety inspections. Coordinated the Injury Management program and Workers' Compensation claims.



**April 1994 to January 1996**

**G\*UB\*MK Constructors (a Joint Venture of Gilbert Commonwealth, Union Boiler and Morrison Knudsen), POWER GENERATION**

**Area Safety Manager**

Initiated and administered on site safety and health programs for Fossil Fuel and Hydroelectric construction and maintenance operations at the Tennessee Valley Authority (TVA) facilities. Responsibilities included programs at six different capital and maintenance hydroelectric and fossil generation projects in the Tennessee, Kentucky, Alabama, Georgia and North Carolina areas.

**December 1991 to April 1994**

**Fluor Constructors International, Inc.**

**Safety Manager**

Ensured contract and safety adherence during power generation projects including boiler Powder River Basin (PRB) coal conversion, capital projects at existing power units, retrofit activities and outage projects at locations in Kentucky, Tennessee, and Indiana.

**June 1990 to December 1991**

**Martin Marietta Energy Systems, Inc.**

**Health Physics Technician**

Ensured compliance with DOE radiation protection standards at uranium enrichment facility. Contamination control, survey and categorization of existing facilities, personnel monitoring, whole body counts and bioassay monitoring for potential uptake of radioactive materials. DOE "L" security clearance

**June 1989 to June 1990**

**D. D. Page and Associates**

**Safety Supervisor**

Development and administration of new build emulsion project safety and health program for Air Products chemical plant expansion project.

**July 1987 to June 1989**

**Fluor Constructors International, Inc.**

**Safety Supervisor**

Project Safety Supervisor for new build boiler and maintenance Power Generation projects. Ensured development and implementation of site and corporate safety program requirements, orientation and training of craft/staff employees, manage industrial hygiene programs as needed.



## **ANTHONY (“TONY”) R. BEJMA**

### **Quality Assurance Manager**

#### **Experience Summary:**

Mr. Bejma has over 30 years in project management, Quality Assurance (QA), records programs, and spent fuel activities, primarily in commercial nuclear industry projects, including over 15 years engaged in decommissioning services. He has provided corporate level oversight and QA support for EnergySolutions D&D projects, including Zion, La Crosse, and SONGS Units 2 & 3. He provided consulting services for the transition of the Humboldt Bay plant from SAFSTOR to decommissioning. As a Dry Fuel Storage QA Engineer, he provided oversight for spent nuclear transfer activities and documentation at the Yankee Rowe, Trojan, and Maine Yankee plants during decommissioning. Provided project planning and execution of spent fuel pool re-racking projects at the Maanshan and Chinshan sites in Taiwan.

#### **Education & Certifications:**

- M.A., Asian Studies, Florida State University
- B.A., Philosophy and Asian Studies, University of South Florida
- A.S., Manufacturing Design, Ball State University
- Lead Auditor, NQA-1 (currently certified for work at Zion and Vermont Yankee plants)

#### **Employment History:**

##### **May 2020 – Present (October 2021)**

##### **Consultant, Various Decommissioning and Dry Fuel Assignments**

Provided consulting services including:

- Dry Fuel Component documentation review, Three Mile Island (Unit 1)
- D&D program and procedure development, Three Mile Island (Unit 2)
- D&D Corrective Actions / Cause Evaluations, various projects
- QA program development and D&D programs transition planning, Kewaunee

##### **May 2016 – January 2020**

##### **EnergySolutions**

##### **Vice President, Quality Assurance**

Provided corporate level oversight and specialized QA support for the Zion, La Crosse and SONGS decommissioning projects. Led the development of the decommissioning QA program at SONGS and established staffing, procedures, and audits to ensure a successful start to the decommissioning transition for Units 2 & 3. Provided guidance for activities associated with spent nuclear fuel transfer projects and decommissioning activities, including transition from operations to active DECON tasks, developed corporate QA programs and procedures supporting decommissioning.



**July 2015 – April 2016**

**Consultant, Various Decommissioning and Dry Fuel Assignments**

Provided consulting services including:

- Dry Fuel project closeout and QA Manager turnover at Zion
- QA program audit and assistance on dry fuel oversight planning at Vermont Yankee
- La Crosse QA program revisions
- Maine Yankee fire protection procedure review and revisions

**October 2010 – July 2015**

**EnergySolutions/ZionSolutions, Zion Nuclear Station**

**Director of Quality Assurance**

Established and implemented the QA program for the decommissioning project following a prolonged SAFSTOR period. This included all oversight activities and processes (audits, surveillances, and inspections), supplier evaluation, procurement evaluation, QA/QC staff development, etc. Successfully established and managed QA oversight and QA inspection efforts for the Dry Fuel Transfer and Greater-Than-Class-C (GTCC) projects for over a year. Authored strategic QA program revisions associated with NRC License Amendments. Served key role in providing vision, guidance and focus on post-Fuel Transfer Operations (FTO) site-wide procedure reduction initiative.

**November 2009 – May 2010; January 2009 – April 2009**

**Humboldt Bay Nuclear Plant**

**Consultant**

Provided consulting services for the QA program and records strategy for decommissioning. Developed and implemented QA program changes. Developed and implemented on-site processing of records, including program and procedure changes specific to the Independent Spent Fuel Storage Installation (ISFSI) and decommissioning records. Provided consulting services during the transition of the plant from SAFSTOR to decommissioning. Identified and executed Engineering and Design Control procedures reduction project.

**April 2007 – July 2008**

**Yankee Rowe/Connecticut Yankee/Maine Yankee**

**Documentation Manager**

Obtained, reviewed and filed spent nuclear fuel records and wrote ISFSI procedures.

**October 2006 – April 2007**

**Bradwell Nuclear Site, United Kingdom (UK)**

**Project Manager**

Managed the Waste Inventory & Characterization project for the Bardwell decommissioning, on schedule and under budget for an international consortium. Responsible for all work planning, scheduling, cost control and contract management.





**May 2001 – September 2006**

**Various Decommissioning Sites**

**Decommissioning Documentation/QA Engineer/Corrective Actions Coordinator positions**

Provided consulting services for documentation management, QA and Quality Control processes, and Corrective Actions Program (CAP) for dry fuel storage projects.

- Yankee Rowe (July 2004 – September 2006)
- Maine Yankee (July 2003 – July 2004)
- Trojan (July 2002 – July 2003)
- Maine Yankee (May 2001 – July 2002)

**Other Nuclear Work Experience:**

- From 1986 to 2001, for Underwater Construction Corporation, performed Project Management and QA/QC services for numerous spent fuel pool re-rack and other nuclear diving projects.
- During 1994 – 1995, Project Manager for the Maanshan plant (Taiwan) re-rack project, for the procurement and mobilization phase - responsible for project planning, including procurement, procedures, crew selection, and site mobilization. Also directed the spent fuel re-rack work at Chinshan.
- Other re-rack projects were conducted in the UK (Sizewell) and the U.S. (Maine Yankee, Nine Mile Point, Wolf Creek, Callaway, Davis Besse, Comanche Peak and Fermi nuclear plants).

**ATTACHMENT 3**

**LIST OF REGULATORY COMMITMENTS**

**Kewaunee Power Station  
Dominion Energy Kewaunee, Inc.**

**EnergySolutions, LLC**

The following list identifies regulatory commitments in Attachment 1 to this letter ("Response to Request for Additional Information Application for Order Approving License Transfer and Conforming License Amendments"). Any other actions discussed in the submittal represent intended or planned actions. They are described only as information and are not Regulatory Commitments.

REGULATORY COMMITMENT	TYPE		SCHEDULED COMPLETION DATE
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
EnergySolutions commits to providing an updated Irradiated Fuel Management Plan, in accordance with 10 CFR 50.54(bb).	X		Within 90 days after license transfer