

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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

Serial No. 00-614A
NL&OS/ETS R0
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
FUEL TRANSITION PROGRAM - DOMINION TOPICAL REPORTS

On November 2, 2000, a meeting was conducted with the NRC to discuss Virginia Electric and Power's (Dominion) program for transition to Framatome Cogema Fuels (FCF) fuel in the reload cores at North Anna Power Station. The objective of the meeting was to discuss the transition program, define the Dominion Generation and FCF responsibilities in conducting the program and to obtain NRC Staff feedback on three key program elements: 1) program features, 2) licensing approach and 3) schedule.

There was one element of the licensing plan that the Staff questioned. This involved Dominion's use of Generic Letter 83-11, "Supplement 1: Licensee Qualification For Performing Safety Analyses," program to effect certain changes to previously approved Dominion topical reports. Although the Staff acknowledged that they were not familiar with the specific topical reports, they expressed concern regarding the use of GL 83-11 methods to eliminate the fuel vendor restriction in the topical report without further NRC review. The topical reports involved are VEP-FRD-42, Revision 1-A, "Reload Nuclear Design Methodology" and VEP-NE-1-A, "Relaxed Power Distribution Control Methodology." The expected changes to VEP-FRD-42 and VE-NE-1-A are (a) the addition of references to FCF's methodologies and codes for DNB analysis and, (b) the removal of restrictive language that limits the applicability of Dominion methodologies to Westinghouse fuel. Specifically, the Staff's SER for VEP-FRD-42, Rev. 1-A states: "We have reviewed the Reload Nuclear Design Methodology described in VEP-FRD-42, Revision 1 and find it acceptable for referencing by Virginia Power in licensing Westinghouse supplied reloads of Westinghouse supplied reactors."

Based on the concerns expressed at the November 2 meeting, we are hereby requesting Staff review of Dominion Topical reports VEP-FRD-42-A, "Reload Design Methodology" and VE-NE-1-A, "Relaxed Power Distribution Control Methodology," with

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respect to the use of Generic Letter 83-11, Supplement 1, for qualifying these topical reports for use with FCF Fuel.

The topical report and associated submittals, which have been previously docketed, were provided to the Project Manager subsequent to the meeting. To ensure the fuel transition program schedule can be maintained, Dominion requests that the NRC provide a position concerning the use of Generic Letter 83-11 for the purposes identified above by February 15, 2001. During the course of this review, Dominion anticipates engaging in discussions with the Staff on a mutually agreeable schedule.

If you have any additional questions or comments, please contact us.

Very truly yours,



Leslie N. Hartz
Vice President - Nuclear Engineering and Services

Commitments contained in this letter: None

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