October 25, 2001

LICENSEES: Virginia Electric Power Company

FACILITIES: North Anna, Units 1 and 2
Surry, Units 1 and 2

SUBJECT: SUMMARY OF OCTOBER 3 and 4, 2001, TELECOMMUNICATION WITH VIRGINIA ELECTRIC AND POWER COMPANY

On October 3 and 4, 2001, the U.S. Nuclear Regulatory Commission (NRC) staff had conference calls with representatives of Virginia Electric and Power Company (VEPCO) to discuss information relating to the staff's review of the North Anna, Units 1 and 2 (NAS 1 and 2), and Surry, Units 1 and 2 (SPS 1 and 2) license renewal applications (LRAs). The information discussed, the applicant's responses, and the follow-up actions are in Attachment 1. A list of participants is included in Attachment 2.

A draft of this telephone conversation summary was provided to VEPCO to allow them the opportunity to comment on the contents of its input prior to the summary being issued.

/***RA***/

Robert J. Prato, Project Manager
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-338, 50-339, 50-280, and 50-281

Attachment: As stated

cc w/att: See next page

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OFFICE	LA:DRIP	ME:RLSB:DRIP	BC:RLSB:DRIP
NAME	EHylton*	RPrato*	CGrimes
DATE	10/23/01	10/15/01	10/25/01

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SUMMARY OF TELECOMMUNICATION WITH
VIRGINIA ELECTRIC AND POWER COMPANY
OCTOBER 3 and 4, 2001

Section 2.2, "Plant Level Scoping"

Item 2.2-1 In the North Anna Station (NAS) license renewal application (LRA), Table 2.2-1, the applicant lists the Alternate AC (AAC) Diesel Generator Systems and several associated systems such as AAC diesel cooling water, AAC diesel fuel oil, AAC diesel lube oil, and AAC diesel starting air to be within the scope of license renewal. Since the AAC diesel service air (BSR) is one of the support systems to AAC it appears that this system should be treated similar to the other AAC support systems as within the scope of license renewal. Diesel generator systems are required for station blackout, and should be included within the scope of license renewal according to 10 CFR 54.4 (a)(3). Justify the exclusion of the BSR from the scope of license renewal, or include BSR as within the scope of license renewal.

The applicant clarified that AAC diesel service air (BSR) is one of the support systems to AAC. It provides pressurized service air for pneumatic equipment during maintenance activities and does not support the operation of the AAC diesel during a station blackout or any other safety related or safety supporting function. Therefore, the AAC diesel service air (BSR) support system is not required to meet 10 CFR 54.4 (a), and is not within the scope of license renewal.

The staff found the applicant's clarification acceptable and will not need any additional information regarding this matter.

Section 2.3.3.29, "Liquid and Solid Waste (LW)"

Item 2.3.3.29-1 In the NAS LRA, the applicant identifies the LW as being within the scope of license renewal. The portion of the LW system that is subject to an aging management review (AMR) consists of the components that provide the pressure boundary for the chemical and volume control (CH) and component cooling (CC) systems. In the LRA, Table 2.3.3-26, the applicant identifies the steam generator blowdown heat exchangers and some pressure boundary valve bodies as being subject to an AMR. Please identify any LW system containment isolation valves that are within scope of license renewal, and identify where in the LRA is the AMR for the valve bodies associated with these valves?

The applicant verified that the portion of the LW system that is subject to an AMR consists of the components that provide the pressure boundary for the CH and CC systems. In addition, the steam generator blowdown heat exchangers and some pressure boundary valve bodies are also subject to an AMR. However, the LW system does not penetrate containment and, therefore, there are no LW containment isolation valves or related components.

The staff found the applicant's verification acceptable and will not need any additional information regarding this matter.

Item 2.3.3.29-2 In the Surry Power Station (SPS) LRA, the liquid and solid waste systems are not identified as within the scope of license renewal. According to the Surry UFSAR, its design also include steam generator blowdown and pressure boundary valves. Explain the design differences between NAS and SPS to justify the exclusion of the liquid and solid waste systems from scope of license renewal for Surry. Explain why the SPS steam generator blowdown and pressure boundary valves do not meet 10 CFR 54.4 scoping criteria while these same components at NAS do meet 10 CFR 54.4. Identify any liquid and solid waste system containment isolation valves that are within the scope of license renewal.

The applicant explained that North Anna and Surry use different system boundary nomenclature. At NAS, the CH ion exchangers drain valves are identified as LW valves. The North Anna system boundary interface among CH, Radwaste (RW) and LW is shown on drawing 11715-LRM-087D, Sheet 1 and 2.

At SPS, the drain valves on the CH ion exchangers are identified as CH valves. The SPS system boundary interface between CH and LW is shown on drawing 11448-LRM-088A, Sheet 3 and 4, and on drawing 11548-LRM-088A, Sheet 1 and 2.

The designs of the blowdown systems at North Anna and Surry are different, as well. The NAS blowdown system uses a flash tank design and discharges the blowdown to waste. The steam generator blowdown heat exchangers at North Anna cool the flash tank effluent and are within the boundary of the LW system. The cooling water is from the CC system and the portion of the heat exchanger that provides a pressure boundary for the CC system is the portion in scope and subject to AMR. The only intended function provided by the heat exchanger is the CC system pressure boundary. In addition, the temperature control valve on the CC outlet piping of these heat exchangers has a LW mark number and was included in the scope of license renewal per 10 CFR 54.4(a)(1).

The SPS Blowdown systems design has a blowdown recovery system and uses condensate as the cooling medium. The blowdown interface with condensate is at a non-safety-related portion of the condensate system and was determined to have no intended function per 10 CFR 54.4.

The staff found the applicant's response acceptable and will not need any additional information regarding this matter.

Section 2.3.3.31, "Gaseous Waste (GW)"

Item 2.3.31-1 The NAS UFSAR, Section 3.2.2 and Table 3.2-1, identifies portions of the GW system such as gas waste decay tanks, waste gas recombiner, compressors, filter, blowers, piping and valves, and supports from stripper to dilution air, and surge drum are Seismic Category I, and therefore, are safety-related (SR) in current the design bases. The SPS UFSAR, Table15.2-1, identifies portions of the GW system such as gas waste decay tanks, waste gas recombiner, compressors, filter, and blowers are Seismic Category I, and therefore, are safety-related in the current design bases. These portions of the GW system are not identified in the LRA as within the scope of license renewal. Provide justification for your determination.

Various GW components are classified as SR in the "Dominion electronic database" (EDS). During scoping, the Surry GW system was determined to be within the scope of license renewal.

During the screening of the SPS GW system the applicant determined that the GW components associated with the Containment Hydrogen Analyzer System and the Containment atmosphere sample penetration supports the pressure boundary functions and, therefore, are subject to an AMR. These components are shown on drawing 11448-LRM-090C.

During the scoping process, the applicant also determined that the failure of the NAS and SPS GW systems (on the bases of the Waste Gas Decay Tank Rupture accident analysis), would result in dose consequences well below the guidelines of Part 100. Therefore, these portion of the NAS and SPS GW systems have no intended function for the purpose of license renewal and need not be subject to an AMR.

The staff found the applicant's response acceptable and will not need any additional information regarding this matter.

Item 2.3.3.31-2 In the SPS LRA, Section 2.3.3.26, the applicant identified the GW system to be within the scope of license renewal for both Units 1 and 2. License renewal drawing 11448-LRM-090C, Sh.1 is identified as a drawing for Unit 1 only. Please verify that this drawing also applies to Unit 2.

Yes, the drawing 11448-LRM-090C, Sh.1 is applicable for both Unit 1 and Unit 2. It depicts the Containment Hydrogen Analyzer System, which is a common system for the two units at Surry.

The staff found the applicant's verification acceptable and will not need any additional information regarding this matter.

Section 2.3.3.34, "Radiation Monitoring (RM)"

2.3.3.34-1 The portion of the radiation monitoring (RM) system identified in the LRA as within the scope of license renewal includes containment penetration isolation function (containment pressure boundary only). It is not clear why the components associated with the radiation monitoring function such as post-accident radiation monitors, containment high-range radiation monitor system, containment gaseous and particulate monitors are not identified as within the scope of license renewal. Are the above radiation monitors safety-related for North Anna and Surry? The equipment such as piping/tubing, valves, pumps, filters, and instrument tubing associated with the above radiation monitors should be within the scope of license renewal based on the requirements of 10 CFR 54.4(a). Justify the exclusion of these radiation monitor systems from the scope of license renewal.

With the exception of the containment high range radiation monitors (CHRRMS) at SPS and NAS, the radiation monitoring function has been determined not to be an intended function. The CHRRMS monitor does serve an intended function for radiation monitoring and is in the scope of license renewal, but the monitor has no passive components subject to AMR.

The portion of the RM system that is subject to AMR consists of the components that perform a Containment pressure boundary function as part of the RM system Containment penetration.

The staff found the applicant's response acceptable and will not need any additional information regarding this matter.

Section 3.6, "Aging Management of Electrical And Instrumentation and Controls"

Item 3.6-1 In response to the staff's request for the applicant to manage aging of non-EQ insulated power, instrumentation, and control cables and connectors, as documented in a letter dated June 17, 2001, the applicant commits to a visual inspection of representative samples of accessible insulated power, instrumentation, and control cables and connectors. Visual inspection alone, however, will not necessarily detect reduced insulation resistance (IR) levels in the cable insulation. Exposure of electrical cables to adverse localized environments caused by heat or radiation can result in reduced IR. Reduced IR causes an increase in leakage currents between conductors and from individual conductors to ground. A reduction in IR is a concern for circuits with sensitive, low level signals such as radiation and nuclear instrumentation since it may contribute to inaccuracies in the instrument loop. Because low level signal instrumentation circuits may operate with signals that are normally in the low milliamp range or less, they can be affected by extremely low levels of leakage current. These low levels of leakage current may affect instrument loop accuracy before the adverse localized environment can cause changes that are visually detectable. Routine calibration tests performed as part of the plant surveillance test program can be used to identify the potential existence of this aging degradation. Provide a technical justification that <u>demonstrates</u> that visual inspection will be effective in detecting damage before current leakage can affect instrument loop accuracy, or provide a description of your plant calibration test program that will be relied upon as the aging management activity (AMA) used to detect this aging degradation in sensitive, low-level signal circuits.

The staff and the applicant discussed the information being requested. In the end, the applicant stated that they understand what information is being asked for by the staff and agreed to respond to this item in an RAI.

The staff will provide a request for additional information (RAI) requesting that the applicant identify the means by which the applicant will manage low level current leakage in instrument cables.

Item 3.6-2 In its non-EQ cable monitoring program description, the applicant notes that there is no direct-buried medium voltage, frequently-energized cable at SPS and NAS that could be susceptible to degradation due to wetted conditions. The term “frequently energized” has not been defined. In past LRAs the term “significant voltage exposure” was used instead and was understood to mean subjected to system voltage for more than 25 percent of the time. Please verify that your definition of the terminology “frequently energized” is the same as the definition of “significant voltage exposure” (subjected to system voltage for more than 25 percent of the time).

The applicant stated that the draft AMA for Cable Monitoring in response to the staff’s request, as documented in a letter dated June 17, 2001, has been enhanced to replace the words “frequently energized” with the phrase “exposed to significant voltage (i.e., subjected to system voltage more than 25 percent of the time)”.

The staff found the applicant’s verification acceptable and will not need any additional information regarding this matter.

Item 3.6-3 Under “Preventive Actions” in the non-EQ cable monitoring activity the applicant states that “periodic actions will be taken to prevent inaccessible non-EQ medium-voltage cables from being exposed to significant moisture . . . .” In the same non-EQ cable monitoring activity under “Acceptance Criteria” applicant states that “[t]he acceptance criterion with respect to wetted conditions is the absence of long-term submergence of cables.” The term “significant moisture” used in the preventive actions has been understood in past LRAs to mean periodic exposures to moisture that last more than a few days (i.e., cable in standing water). Periodic exposures to moisture of less than a few days (i.e., normal rain and drain) are not significant. Please clarify your definition of significant moisture in the context of its use in the non-EQ cable monitoring AMA. Also, verify that this same definition applies to the terminology “long-term submergence” used in the acceptance criteria of the non-EQ cable monitoring activity.

The AMA for Cable Monitoring Activities has been revised to indicate that periodic action will be taken to prevent inaccessible non-EQ medium-voltage cables from being exposed to significant moisture that is defined as being submerged in standing water for a period as long as several months (i.e. up to three months for manholes without sump pumps; up to one year for manholes with sump pumps). This periodic action to inspect for water collection in cable manholes is performed despite the fact that no water is expected due to the manholes being sealed. Corrective action would include draining any water that is present. This change appears in the section designated *Preventive Actions*.

The staff did not fully agree with the applicant's response, and will provide an RAI requesting that the applicant provide a response to this concern.

Item 3.6-4 Under "Corrective Actions" in the non-EQ cable monitoring activity the applicant identifies the actions to be taken if the acceptance criteria of the cable monitoring AMA is not met. The corrective actions do not identify a need to determine whether the same condition or situation is applicable to other accessible or inaccessible cables or connections. Because your non-EQ cable monitoring activity inspects only representative samples of non-EQ cable and connections, such an action is necessary. Please verify that your corrective actions include this action or provide the technical basis why it is not necessary.

The AMA for Cable Monitoring Activities has been revised to indicate that the engineering evaluation of inspection results anomalies for the representative samples of accessible cables and connectors will consider whether the observed condition is applicable for other accessible or inaccessible cables and connectors. This change appears in the section designated *Corrective Actions*.

The staff found the applicant's verification acceptable and will not need any additional information regarding this matter.

Item 3.6-5 In both LRAs, Table 3.0-2, regarding the external service environments exposed to borated water leakage, the applicant states that "[t]his environment is not considered for in-scope cables and connectors since cables are insulated, splices are sealed, and terminations are protected by enclosures." With regard to terminations protected by enclosures, operating events have occurred where water and borated water have migrated into enclosures and terminations by following cables or moving through conduits. Are the cables and conduit that penetrate enclosures which you credit for protecting terminations, sealed to prevent the intrusion of borated water into the enclosure? If not, provide the technical basis for concluding that these enclosures will protect the enclosed terminations from borated water leakage.

The staff and the applicant discussed the information being requested. In the end, the applicant stated that they understand what information is being asked for by the staff and agreed to respond to this item in an RAI.

The staff will provide an RAI requesting that the applicant provide a response to this concern.

Item 3.6-6 In both LRAs, Section 3.6.2, the applicant identifies Polyimide (Kapton) as one of the organic compounds used in the construction of cables and connectors. Kapton insulation has a well-known vulnerability to moisture (e.g., Note 6, Table 4-2, Ogden Environmental and Energy Services, Inc., contractor report, SAND96-0344). It appears, however, that the cable and connector AMAs only address wetted conditions for medium voltage cables (water-treeing). Please verify that your aging management activity also addresses wetting of Kapton insulation or provide the technical basis for not doing so.

The applicant explained that there are no non-EQ cables with Kapton insulation, all applicable cables are EQ cables and are managed under the EQ program.

The staff found the applicant's verification acceptable and will not need any additional information regarding this matter.

Section 4.7.2, " Reactor Coolant Pump Flywheel"

Item 4.7.2-1 NAS 1 and 2, and SPS 1 and 2 were approved to apply topical report, WCAP-14535A, "Topical Report on Reactor Coolant Pump Flywheel Inspection Elimination," and to adopt a 10-year inspection intervals for the reactor coolant pump flywheels in their technical specifications. Confirm that these 10-year inspection intervals will be continued for the period of extended operation for all four units.

The applicant informed the staff that the 10-year inspection intervals for reactor coolant pump flywheels are currently in augmented inspection program and will be carried forward to the extended period of operation.

The staff found the applicant's verification acceptable and will not need any additional information regarding this matter.

Section 4.7.3, " Leak-Before-Break"

Item 4.7.3-1 In both LRAs, Section 4.7.3, the applicant concludes that the leak-before-break analysis is projected to be valid for the period of extended operation in accordance with 10 CFR 54.21(c)(1)(ii). Confirm that the leak-before-break (LBB) analysis that was mentioned in your conclusion is for primary loop piping only. If this is the case, identify all welds in the primary loop piping which have been fabricated from Alloy 82/182 weld material. Explain why, given the Summer main coolant loop weld cracking event, that the primary loop piping at both NAS 1 and 2, and SPS 1 and 2 will continue to meet the underlying requirements for the application of LBB into the period of extended operation. In particular, address the "criteria" from NUREG-1061, Vol. 3, which suggests that no active degradation mechanism (mechanism that would undermine the assumption of the LBB analysis) can be present in a line, which is under consideration for LBB. The draft Standard Review Plan (DSRP) 3.6.3 which would have permitted lines subject to a potentially active degradation mechanism (like IGSCC) to be considered for LBB application provided that two mitigating actions/programs were in place (like residual stress improvement and hydrogen water chemistry) to address the potentially active degradation mechanism. As part of the above mentioned effort, you shall commit to implementing the resolutions from the ongoing NRC/Industry program on Alloy 82/182 weld material to ensure the validity of the LBB analyses at NAS 1 and 2, and SPS 1 and 2 during the license renewal period.

If the LBB analysis that was mentioned in the conclusion is not just for primary loop piping, then identify all piping systems/lines which have been approved for LBB for North Anna and Surry under the current operating licenses and repeat the same effort for these systems/lines. For lines (such as surge lines) which the existing licensing basis cumulative fatigue usage factor (CUF) calculations did not adequately account for environmental effects on fatigue damage, you are requested to provide an assessment of their CUFs based upon a consideration of the effect of the operating environment on fatigue damage. Recent developments/guidance on the evaluation of this issue can be found in NUREG/CR-5704, “Effects of LWR Coolant Environments on Fatigue Design Curves of Austenitic Stainless Steels.” If any CUF exceeds 1, provide justification for still considering the LBB analysis for this particular line as valid for the period of extended operation. Please respond to this question for each facility individually.

a. For SPS, the LBB analysis for primary loop piping was identified as a time-limited aging analysis (TLAA) since material properties change over time due to thermal aging. No other lines were analyzed for LBB. There are no welds of Alloy 82/182 weld material in the primary piping analyzed for LBB. Therefore, unlike V. C. Summer, there is no concern for intergranular stress corrosion cracking (IGSCC) in the SPS 1 and 2. Additionally, Surry Power Station operates with improved water chemistry, which protects the material from IGSCC. The environmental effects on fatigue are addressed in Section 4.3.4 of the license renewal application. LBB has not been applied to the surge lines and the nozzle connections to charging nozzles and safety injection nozzles.

   The staff found the applicant’s response acceptable and will not need any additional information regarding this matter.

b. For NAS 1 and 2, the LBB analysis for primary loop piping was identified as a time-limited aging analysis (TLAA) since material properties change over time due to thermal aging. The by-pass lines were also analyzed for LBB. The material of the bypass line is forged stainless steel and is not subjected to thermal aging. The analysis for the by-pass lines is not a TLAA because material properties of by-pass lines used in the analysis remains constant. Only the steam generator primary nozzles to safe-end welds in the primary loop piping analyzed for LBB have been fabricated from Alloy 82/182-weld material for NAS 1 and 2. NRC approved the LBB technology for NAS 1 and 2 in December 1988, which was based on the criteria defined in NUREG-1061, Volume 3, and in compliance with the revised GDC-4. The requirements for the LBB applicability are a part of current licensing basis. The steam generator primary nozzles to safe-end welds are shop welds and, therefore, residual stresses are minimized. The chemistry of the water is controlled by chemistry control program for primary system, which is described in Section B2.2.4 in the license renewal application. Hence, no known active degradation mechanism for (primary water stress corrosion cracking) PWSCC exists for these welds. Consistent with the requirement of draft Standard Review Plan (DSRP) 3.6.3, LBB analysis remains valid for North Anna reactor coolant loops. VEPCO is participating in the ongoing NRC/industry program on alloy 82/182-weld material and will be implementing the resolutions. Since there are no welds in the by-pass lines that were fabricated from Alloy 82/182 weld material, PWSCC is not a concern and the LBB analysis is not affected.

The environmental effects on fatigue are addressed in Section 4.3.4 of the license renewal application. LBB has not been applied to the surge lines and the nozzle connections to charging nozzles and safety injection nozzles.

The staff noted that the applicant can not take credit for its chemistry control program for the primary system to determine that PWSCC is not an applicable aging effect for the welds of concern, therefore, the applicant must recognize PWSCC as an applicable aging effect. In response to this concern, the applicant referred the staff to Table 3.1.5 -1 that includes the welds of concern, cracking as an applicable aging effect, and water chemistry control as the AMA. However, the staff believes that chemistry control alone is not a reasonable approach for managing this aging on the basis of information currently available in the industry. Upon conclusion of the ongoing NRC/industry program relating to 82/182-weld material other aging management activities may be needed as is recognized by the applicant. Therefore, the staff will provide an RAI requesting that the applicant provide additional information regarding the need to include a summary description (and/or follow-up action) in its FSAR Supplement describing future (or follow-up action items for) aging management activities consistent with 10 CFR 54.21(d).

Section B2.1.3, "Tank Inspection Activities"

Item B2.1.3-1 The scope of this aging management program includes the tanks which are above ground, as well as those that are located below grade. Experience with the implementation of Unresolved Safety Issue (USI) A-46 indicate that for the above grade tanks, their anchorage components require frequent inspections and aging management. For the tanks located below grade, the degradation of exterior surfaces would depend upon the pH level and aggressive chemicals in the surrounding soil. Please provide more information regarding your operating experience for these broad categories of tanks for North Anna and Surry.

The applicant clarified that Tank Inspection is a new activity that is under development. Because the inspection activity has not previously existed, there have been only limited internal and external examinations of selected tanks. The external surfaces of most tanks that are insulated, protected by a missile barrier, or buried, have not been previously inspected. For above grade tanks that do not have such coverings for the external surfaces, condition monitoring of external attachments/anchorages is performed during the daily process of performing plant walkdowns. For tanks that do have such coverings, inspections of anchorages will occur during the new Tank Inspection Activities.

External inspections have been performed during insulation removal from some above ground tanks, but have not yet been performed for buried tanks. Such inspections will be performed as part of the new Tank Inspection Activities. As indicated in the LRA statement of operating experience for Section B2.1.3, prior inspections, although limited in scope, indicate that there has been no significant loss of material from the base metal.

The staff found the applicants response to this concern acceptable; however, the staff will provide an RAI to more formally document the information provided by the applicant.

Item B2.1.3-2 Based on the description provided in the "Summary" section of this AMP, the staff understands that currently you are performing routine maintenance inspection of these tanks, and you will be performing a focused one time inspection of these tanks prior to the start of the extended period of operation. Your future inspections during the extended period of operation will depend upon the findings of this focused inspection. Please confirm or explain.

It is Dominion's intent to plan future tank inspection activities based on an engineering evaluation of the results of the one-time inspections of tanks that will be performed prior to beginning the period of extended operation.

The staff found the applicants response to this concern acceptable; however, the staff will provide an RAI to more formally document the information provided by the applicant.

Section B2.2.2, "Battery Rack Inspections"

Item B2.2.2-1 In both LRAs, Section B2.2.2, under "Parameters Monitored or Inspected," the applicant states that the condition of the battery support racks are visually inspected on a periodic basis to reasonably assure that their function to adequately support the batteries is not compromised. The aging effect that is monitored by these inspections is loss of material due to corrosion.

a. The applicant is requested to describe the aging effect on battery spacer(s) if used in the seismic rack assembly of the batteries.

Both rigid and compressible spacers are used between cells of station batteries. These spacers are considered to be part of the rack for the purpose of periodic inspections. Degradation of the spacers would be detected during the periodic inspections of the battery cells and the battery support rack assemblies. These inspections are performed at least quarterly.

The staff found the applicant's response acceptable and will not need any additional information regarding this matter.

b. The applicant is also requested to discuss whether degradation of the mounting or restraining of racks should be considered an applicable aging effect that requires management as part of the inspection activities.

As indicated in the summary of *Detection of Aging Effects*, inspections are conducted to ensure the integrity of the battery racks. Anchorages that provide restraint for the batteries are susceptible to aging effects requiring management, and are included in the scope of these quarterly inspections.

The staff found the applicant's response acceptable and will not need any additional information regarding this matter.

Item B2.2.2-1 In both LRAs, Section B2.2.2, under "Detection of Aging Effects," the applicant states that visual inspections identify degradation of the physical condition of the support racks. These inspections check for loss of material (corrosion) of the support racks. Inspections provide reasonable assurance that the integrity of the racks is maintained during a seismic event. The applicant is requested to provide a detailed discussion on how seismic adequacy of the rack is determined, when visually detected to have degradation.

Corrosion or damage of the battery racks, and their anchorages, could indicate that the function of seismic restraint is compromised. As indicated in *Acceptance Criteria*, engineering evaluations determine whether the observed condition is significant enough to compromise the ability of the battery rack to perform its intended function during a seismic event. Repairs that are required as a result of the engineering evaluation would be implemented through the Corrective Action System.

The staff found the applicant's response acceptable and will not need any additional information regarding this matter.

Telecom Participants by Topic

Section 2.2 Scoping Items

Linwood Morris	VEPCO
Paul Aitken	VEPCO
Michael Henig	VEPCO

Julius Wroniewicz	VEPCO
Marc Hotchkiss	VEPCO
Tom Snow	VEPCO
Chang Li	NRC
Robert Prato	NRC

Section 3.6, "Aging Management of Electrical And Instrumentation And Controls"

Paul Aitken	VEPCO
Michael Henig	VEPCO
Julius Wroniewicz	VEPCO
Preston Doughtery	VEPCO
Ben Rodill	VEPCO
James Lazevnick	NRC
Robert Prato	NRC

4.7.2 Reactor Coolant Pump Flywheel

Paul Aitken	VEPCO
Michael Henig	VEPCO
Julius Wroniewicz	VEPCO
Marc Hotchkiss	VEPCO
Tom Snow	VEPCO
James Lazevnick	NRC
Robert Prato	NRC

4.7.3 Leak-Before-Break

Paul Aitken	VEPCO
Michael Henig	VEPCO
Julius Wroniewicz	VEPCO
Marc Hotchkiss	VEPCO
Tom Snow	VEPCO
James Lazevnick	NRC
Robert Prato	NRC

Section B2.1.3, "Tank Inspection Activities"

Marc Hotchkiss	VEPCO
Tom Snow	VEPCO
Paul Aitken	VEPCO
Michael Henig	VEPCO
Julius Wroniewicz	VEPCO
Clifford Munson	NRC
Hansraj Ashar	NRC
Robert Prato	NRC

Section B2.2.2, "Battery Rack Inspections"

Marc Hotchkiss	VEPCO
Tom Snow	VEPCO
Paul Aitken	VEPCO
Michael Henig	VEPCO
Julius Wroniewicz	VEPCO
Saba Sabe	NRC
Arnold Lee	NRC
Robert Prato	NRC

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T. Collins
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D. Thatcher
G. Galletti
B. Thomas
J. Moore
R. Weisman
M. Mayfield
A. Murphy
W. McDowell
S. Droggitis
N. Dudley
RLSB Staff

R. Emch
G. Edison
S. Monarque
K. Landis
C. Julian

Virginia Electric and Power Company

North Anna & Surry Power Stations
Units 1 and 2

Mr. Michael Schlemmer
Emergency Services Director
Louisa County
P.O. Box 160
Louisa, Virginia 23093

Mr. David A. Heacock
Site Vice President
North Anna Power Station
P.O. Box 402
Mineral, Virginia 23117

Mr. David Lewis
Shaw Pittman, LLP
2300 N Street, NW
Washington, DC 20037-1128

Mr. Richard H. Blount, II
Site Vice President
Surry Power Station
Virginia Electric and Power Company
5570 Hog Island Road
Surry, Virginia 23883

Dr. W. T. Lough
Virginia State Corporation Commission
Division of Energy Regulation
P.O. Box 1197
Richmond, Virginia 23209

Robert B. Strobe, M.D., M.P.H.
State Health Commissioner
Office of the Commissioner
Virginia Department of Health
P. O. Box 2448
Richmond, Virginia 23218

Lillian Cuoco, Esq.
Senior Nuclear Counsel
Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Building 475/5
Waterfprd, CT 06385

Old Dominion Electric Cooperative
4201 Dominion Blvd.
Glen Allen, Virginia 23060

Mr. S. P. Sarver, Director
Nuclear Licensing & Operations Support
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, Virginia 23060

Office of the Attorney General
Commonwealth of Virginia
900 East Main Street
Richmond, Virginia 23219

Senior Resident Inspector
North Anna Power Station
U.S. Nuclear Regulatory Commission
1024 Haley Drive
Mineral, Virginia 23117

Mr. William Corbin
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, Virginia 23060

Mr. Alan P. Nelson
Nuclear Energy Institute
1776 I Street NW
Suite 400
Washington, D.C. 20006

Senior Resident Inspector
Surry Power Station
U.S. Nuclear Regulatory Commission
5850 Hog Island Road
Surry, Virginia 23883

Chairman
Board of Supervisors of Surry County
Surry County Courthouse
Surry, Virginia 23683