

**VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261**

December 7, 2001

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

Serial No. 01-525  
NL&OS/MAE: R1'  
Docket Nos. 50-280/-281  
50-338/-339  
License Nos. DPR-32/-37  
NPF-4/-7

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**RESPONSE TO SAFETY EVALUATIONS**  
**GENERIC LETTER 96-05 (TAC NOS. M97107, M97108, M97073, AND M97074)**

In a letter dated September 17, 1999 (Serial No. 99-002A), Virginia Electric and Power Company (Dominion) resubmitted its response to Generic Letter (GL) 96-05 on periodic verification of design-basis capability of safety-related motor-operated valves. The NRC requested additional information based on that submittal in a letter dated January 6, 2000. Dominion responded to that request for additional information in a letter dated February 28, 2000 (Serial No. 00-013). The NRC transmitted their safety evaluations of our response to GL 96-05 for Surry and North Anna Power Stations in letters dated January 18, 2001 and February 1, 2001, respectively.

We have performed a review of these safety evaluations and have determined that clarification of our program in three areas is required. The first item is program reporting of MOV performance. The Surry safety evaluation (section 5.3) states that a quarterly report is prepared. North Anna safety evaluation (section 5.3) states that the report is prepared periodically. The MOV program at Surry and North Anna Power Stations has evolved over the last several years. The current periodic program reports are now required to be prepared at least every eighteen months by procedure.

The second item of clarification is MOV rate of loading. Both safety evaluations state in section 5.3 that our February 28, 2000 letter indicated that we monitor the rate of loading for MOVs. This is incorrect. Our periodic test program does not monitor rate of loading. Our February 28, 2000 letter stated that we would revise the methodology to use updated rate of loading factors. These updated rate of loading factors were taken from previous dynamic testing and are not continually updated. In order to monitor rate of loading, it is necessary to perform periodic dynamic testing. The only periodic dynamic testing performed is the testing of selected valves as part of our participation in the Joint Owner's Group (JOG) Program. The rate of loading is not evaluated for those valves.

The third item of clarification is the monitoring of the stem/stem nut coefficient of friction (COF). Both safety evaluations state in section 5.3 that our February 28, 2000 letter

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indicated that we monitor the degradation in stem/stem nut COF during the performance of periodic MOV diagnostic tests to verify that negative trends are not developing and to ensure the effectiveness of stem lubrication frequencies. Clarification of this point is needed. Our February 28, 2000 letter stated that the intent of the testing is to verify that no negative trends are developing in the COF and ensure current lubrication preventive maintenance effectiveness. There is a difference between what appears to be inferred by the safety evaluations and what we stated in our letter. The difference is that the safety evaluations appear to infer that the potential COF degradation is monitored and trended for each individual MOV. This requires the comparison of "as found" and "as left" test data. This comparison is not performed. The purpose of our testing is to verify that the actual COF continues to be bounded by the value assumed in the MOV setup calculations. This demonstrates preventive maintenance effectiveness.

If you have any questions, please contact us.

Very truly yours,



Leslie N. Hartz  
Vice President - Nuclear Engineering

Commitments made by this letter: None

cc: U.S. Nuclear Regulatory Commission  
Region II  
Sam Nunn Atlanta Federal Center  
61 Forsyth St., SW, Suite 23T85  
Atlanta, Georgia 30303-8931

Mr. R. A. Musser  
NRC Senior Resident Inspector  
Surry Power Station


Mr. M. J. Morgan  
NRC Senior Resident Inspector  
North Anna Power Station

COMMONWEALTH OF VIRGINIA     )  
  )  
COUNTY OF HENRICO            )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Leslie N. Hartz, who is Vice President - Nuclear Engineering, of Virginia Electric and Power Company. She has affirmed before me that she is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of her knowledge and belief.

Acknowledged before me this 7th day of December, 2001.

My Commission Expires: March 31, 2004.

  
Notary Public

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