

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

July 26, 2002

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Serial No.: 02-360A
LR/DEA: R0
Docket Nos.: 50-280/281
50-338/339
License Nos.: DPR-32/37
NPF-4/7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
SURRY AND NORTH ANNA POWER STATIONS UNITS 1 AND 2
LICENSE RENEWAL – COMMENTS ON DRAFT SER

In a letter dated June 6, 2002, the NRC provided Virginia Electric and Power Company (Dominion) the draft Safety Evaluation Report (SER) for license renewal of North Anna Power Station, Units 1 and 2, and Surry Power Station, Units 1 and 2. The draft SER was provided for comment and response to the open items and confirmatory actions. The NRC staff identified eight open items and fifteen confirmatory actions associated that require resolution. Dominion provided the requested response to the open items and a disposition of the confirmatory actions identified in the draft SER in a letter dated July 25, 2002 (Serial No. 02-360).

As requested, the draft SER has been reviewed for accuracy and consistency against the License Renewal Applications submitted for Surry and North Anna Power Stations and subsequent information provided by Request for Additional Information responses. Dominion's comments are attached. In the transmittal letter with the draft SER, the NRC staff described their plans to review the format of the SER to further improve the content while incorporating comments and responses. Accordingly, Dominion's comments are limited to items that might be considered to have implications on the bases of the conclusions presented in the SER if not resolved for consistency with the License Renewal Application.

Should you have any questions regarding this submittal, please contact Mr. J. E. Wroniewicz at (804) 273-2186.

Very truly yours,



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Attachment

Commitments made in this letter: None

A001

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Attachment

**License Renewal – Comments on Draft SER
Serial No. 02-360A**

**Comments on Draft Safety Evaluation Report
Dated June 6, 2002
Surry and North Anna Power Station, Units 1 and 2
License Renewal**

**Virginia Electric and Power Company
(Dominion)**

**Comments on Draft SER for Surry and North Anna Power Station
License Renewal Applications**

Comment #1:

General comment.
Various sections and pages

Request for Additional Information (RAI) 2.1-3 caused Dominion to re-assess the license renewal scope for components and systems with regard to 10CFR54.4(a)(2). As a result, additional systems, or portions of systems, were added to the scope of license renewal for each station because of their spatial orientation in and around safety related systems. The draft SER (Section 3) does not accurately reflect the inclusion of these systems in the Aging Management Review Results. It is recommended that the NRC staff consider addressing these systems in a global manner by inclusion of a specific discussion in Section 2.3, *Scoping and Screening Results: Mechanical Systems*.

Comment #2:

Section 2.1.3.1
Page 2-10
3rd paragraph, next to last sentence:

Delete this sentence beginning with "The SDBD..." in its entirety. The System Design Basis Documents (SDBDs) have a controlling procedure but they do not fall under the cognizance of the Nuclear Quality Assurance Program. The referenced LR guideline (LRPG-501) provides the requirements for preparing, reviewing, and approving License Renewal technical reports, but does not control any part of the process to develop or maintain the SDBDs.

Comment #3:

Section 2.1.3.2

Page 2-17

Electrical Components, 2nd, 3rd, and 4th sentences:

This paragraph needs to be revised to clarify that those electrical/I&C components, that are included in the license renewal scope only because they performed a pressure boundary function, were treated as mechanical components in the system screening process. The remaining electrical/I&C components were categorized into component groups regardless of whether or not they had mark numbers. Therefore, delete the 2nd and 3rd sentences and replace them with the following:

"The electrical/I&C components that are in scope because they perform a pressure boundary function are shown on system drawings. The applicant has treated these electrical/I&C components as mechanical components and identified them during system screening."

At the beginning of the 4th sentence replace "For the non-mark-numbered components" with **"For the remaining electrical/I&C components."**

Comment #4:

Section 2.4.1

Page 2-165

1st paragraph, 3rd sentence:

The statement *"The NAS UFSAR does not address the containment structure for the North Anna plant."* is not correct. It should be replaced with the following statement: **"The design of the NAS 1/2 containment structures is described in NAS UFSAR Sections 3.7 and 3.8.2."**

Comment #5:

Section 3.4.3.1.1

Page 3-127

4th paragraph, starting with 3rd sentence:

The information in the following sentences is not correct as stated.
"For the individual subcomponents, the design loadings fit into the normal, upset, or faulted conditions as defined in the ASME Boiler and Pressure Vessel Code, Section III. The allowable stress limits during the design basis accident (DBA) used for the core support structures are based on the January 1971 draft of the ASME Code for Core Support Structures, Subsection NG, and the Criteria for Faulted Conditions."

To be consistent with SER Section 4.3.2, page 4-13, this paragraph should be revised to state: **"The SPS and NAS reactor internals were designed to Westinghouse criteria, which were established prior to the issuance of the ASME Code Section III Subsection NG. The Westinghouse criteria contained no TLAA's and used pressure load calculations instead of fatigue calculations."**

The Westinghouse design of the reactor vessel internals is similar for both the three-loop plants designed with the Westinghouse criteria and the three-loop plants designed with ASME Section III Subsection NG criteria. In addition, the design transients for the reactor coolant system (RCS), including the reactor vessel internals, are similar.

Comment #6:

Section 3.4.3.1.2

Page 3-128

3rd paragraph, last sentence:

The statement that the applicant identifies "*Metal Fatigue*" as an applicable TLAA associated with the RV internals is incorrect. The sentence should either be deleted or replaced with the statement **"In addition, the applicant does not identify any TLAAs associated with the RV internals."**