

**From:** Stephen Raul Monarque  
**To:** Gary Miller; Tom Shaub  
**Date:** 9/27/02 2:02PM  
**Subject:** **North Anna and Surry Power Stations, Conference Call for 10 CFR 50.46 Evaluation Models ECCS**

The staff has additional questions regarding Virginia Electric and Power Company's (VEPCO) submittal, dated June 21, 2002, on the Annual Report of Emergency Core Cooling System (ECCS) Evaluation Model Changes Pursuant to the Requirements of Title 10 of the Code of Federal Regulations, Section 50.46. Please review these questions and contact the staff to schedule a conference call.

In the cover letter of this submittal VEPCO states, "...Based on our evaluation of this information and the associated changes in the applicable licensing basis PCT results, no further action is required to demonstrate compliance with 10 CFR 50.46 requirements." The changes described are only the ones that have occurred in the last year. Remembering that the Analysis of Record (AOR) is the most recent analysis explicitly calculated using a LOCA methodology (approved by the staff as applicable, for licensing-basis LOCA analysis, to the specific plant), what you are calling "Augmented PCT for AOR" is not the AOR PCT.

For the moment, let's not consider Part C(s) for NA-1: It is obvious that, for both LBLOCA and SBLOCA, at some time prior to April 24, 2001, the accumulated absolute values of PCT changes since the November 29, 1995, AOR exceeded 50 F, and at that point there should have been a 30-day report, containing a proposed reanalysis schedule. If this was done, the Staff, established a reanalysis schedule based on the licensee's proposal. This would have started a new accumulation of PCT changes. If all this was completed, VEPCO should have identified it in the June 21, 2002 submittal along with the date of the proposal (or NRC establishment) and the established reanalysis date.

Sincerely,

Stephen Monarque  
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**CC:** Frank Orr; Gordon Edison