

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

December 11, 2002

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

Serial No.: 02-754  
LR/DWL 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 POWER STATION UNITS 1 AND 2**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**LISTING OF LICENSE RENEWAL COMMITMENTS**

Dominion has incorporated the commitments associated with license renewal into a UFSAR supplement for inclusion into the respective UFSARs following issuance of the renewed licenses for Surry and North Anna Power Stations. This supplement was provided to the NRC in the original License Renewal Application and was modified by letters dated July 25, 2002 (Serial No. 02-360), October 1, 2002 (Serial No. 02-332A), November 4, 2002 (Serial No. 02-691), and December 2, 2002 (Serial No. 02-706). The attachment to this letter provides a tabulation of these commitments including a brief statement of the commitment, its location in the UFSAR supplement, frequency of the commitment (as applicable), and the source document of the commitment.

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

Very truly yours,



Leslie N. Hartz  
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Attachment

Commitments made in this letter: No new commitments.

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cc:

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**Attachment**

**License Renewal Application – Commitment Listing**

**Surry Power Station Units 1 and 2  
North Anna Power Station Units 1 and 2**

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

## Surry Power Station and North Anna Power Station License Renewal Commitment Listing

Item	Commitment	UFSAR Supplement Location	Frequency	Source
1.	Develop and implement inspection program for buried piping and valves.	18.1.1, Buried Piping and Valve Inspection	One-time between years 30-40. Additional inspections based on results.	LRA (License Renewal Application) App. A, LRA Table B4.0, & RAI (Request for Additional Information) B2.1.1-1
2.	Add pressurizer surge line to Augmented Inspection Program.	18.2.1, Augmented Inspection Activities	Prior to Period of Extended Operation	LRA Table B4.0, & RAI 4.3-7
3.	Add core barrel hold-down spring to Augmented Inspection Program.	18.2.1, Augmented Inspection Activities	Prior to Period of Extended Operation	LRA Table B4.0
4.	Expand scope of Civil Engineering Structural Inspection to cover License Renewal requirements.	18.2.6, Civil Engineering Structural Inspections	Prior to Period of Extended Operation	LRA Table B4.0
5.	Revise plant documents to use inspection opportunities when inaccessible areas become accessible during work activities.	18.2.6, Civil Engineering Structural Inspections	Prior to Period of Extended Operation	LRA Table B4.0

## Surry Power Station and North Anna Power Station License Renewal Commitment Listing

Item	Commitment	UFSAR Supplement Location	Frequency	Source
6.	Incorporate NFPA-25, Section 2-3.1.1 for sprinklers.	18.2.7, Fire Protection Program	Prior to year 50. If testing used, repeat every 10 years.	LRA Table B4.0
7.	Develop inspection criteria for non-ASME supports and doors.	18.2.9, General Condition Monitoring	Prior to Period of Extended Operation	LRA Table B4.0
8.	Develop procedural guidance for inspection criteria that puts focus on aging effects.	18.2.9, General Condition Monitoring	Prior to Period of Extended Operation	LRA Table B4.0
9.	Develop and implement inspection program for infrequently accessed areas.	18.1.2, Infrequently Accessed Area inspections	One-time between years 30-40. Additional inspections based on results.	LRA App. A, LRA Table B4.0, RAI 3.5-1, & RAI 3.5.8-1
10.	Develop and implement inspection program for tanks.	18.1.3, Tank Inspection Program	One-time between years 30-40. Additional inspections based on results.	LRA App. A, & LRA Table B4.0
11.	Follow industry activities related to failure mechanisms for small-bore piping. Evaluate changes to inspection activities based on industry recommendations.	18.2.11, ISI-Component and Component Supports	On-going activity	LRA Table B4.0, & RAI 3.1.1.2-2



## Surry Power Station and North Anna Power Station License Renewal Commitment Listing

Item	Commitment	UFSAR Supplement Location	Frequency	Source
12.	Follow industry activities related to core support lugs. Evaluate need to enhance inspection activities based on industry recommendations.	18.2.13, ISI - Reactor Vessel	On-going activity	LRA Table B4.0
13.	Inspect representative sections of polar crane box girders.	18.2.10, Load Handling Cranes and Devices	One-time between years 30-40. Additional inspections based on results.	LRA Table B4.0
14.	Follow industry activities related to reactor vessel internals issues such as void swelling, thermal and neutron embrittlement, etc. Evaluate industry recommendations.	18.2.15, Reactor Vessel Internals	One-time inspection between years 30-40 on most susceptible single unit (Surry or North Anna). Additional inspections based on results.	LRA Table B4.0
15.	Implement changes into procedures to assure consistent inspection of components for aging effects during work activities.	18.2.19, Work Control Process	Prior to Period of Extended Operation	LRA Table B4.0
16.	Incorporate groundwater monitoring into the civil engineering structural monitoring program. Consider groundwater chemistry in engineering evaluations of deficiencies.	18.2.6, Civil Engineering Structural Inspections	Prior to Period of Extended Operation	RAI 3.5-2

## Surry Power Station and North Anna Power Station License Renewal Commitment Listing

Item	Commitment	UFSAR Supplement Location	Frequency	Source
17.	Incorporate management of concrete aging into the civil structural monitoring program and the infrequently accessed area inspection programs.	18.1.3, Infrequently Accessed Area Inspections  18.2.6, Civil Engineering Structural Inspections	Prior to Period of Extended Operation	RAI 3.5-7
18.	Incorporate management of elastomers into the work control activities.	18.2.19, Work Control Process	Prior to Period of Extended Operation	RAI 3.5.6-4, & RAI B2.2.19-3
19.	Develop and implement inspection program for Non-EQ cables.	18.1.4, Non-EQ Cable Monitoring Program	One-time between years 30-40. Additional inspections every 10 years thereafter.	RAI 3.6.2-1
20.	Follow industry activities related to Alloy 82/182 weld material. Implement activities based on industry recommendations, as appropriate.	18.3.5.3, Leak-Before-Break	On-going activity	RAI 4.7.3-1
21.	Inspectors credited in the Work Control Process will be QMT or VT qualified.	18.2.19, Work Control Process	Prior to Period of Extended Operation	RAI B2.2.19-1

## Surry Power Station and North Anna Power Station License Renewal Commitment Listing

Item	Commitment	UFSAR Supplement Location	Frequency	Source
22.	Perform audit of work control inspections to ensure representation by all in-scope license renewal systems and to determine need for supplemental inspections.	18.2.19, Work Control Process	Prior to Period of Extended Operation and every 10 years thereafter. Supplemental inspections within 5 year of audit.	RAI B2.2.19-3
23.	Measure the sludge buildup in the service water reservoir at North Anna.	18.2.17, Service Water System inspections	One-time between years 35 and 40	RAI 3.5.8-2
24.	Provide inspection details for pressurizer surge line inspections to the NRC for review and approval.	18.3.2.4, Environmentally Assisted Fatigue	Prior to Period of Extended Operation	RAI 4.3-7, & RAI 4.3-6
25.	Provide inspection details for safety injection and charging line inspections to the NRC for review and approval.	18.3.2.4, Environmentally Assisted Fatigue	Prior to Period of Extended Operation	RAI 4.3-6, & SER Open Item 4.3-1
26.	Address NRC staff final guidance regarding fuse holders when issued.	18.1.4, Non-EQ Cable Monitoring	When issued or prior to Period of Extended Operation, whichever is later.	Ltr. No. 02-691 Dated Nov. 4, 2002.

## Surry Power Station and North Anna Power Station License Renewal Commitment Listing

Item	Commitment	UFSAR Supplement Location	Frequency	Source
27.	Develop and implement a program to control water intrusion into manholes at Surry.	18.1.4, Non-EQ Cable Monitoring	Prior to Period of Extended Operation	RAI 3.6.2-1
28.	Revise procedures for groundwater testing to account for possible seasonal variations.	18.2.6, Civil Engineering Structural Inspections	Prior to Period of Extended Operation	Ltr. No. 02-706 Dated Dec. 2, 2002.
29.	Inspect similar material/environment components, both within the system and outside the system, if aging identified in a location within a system cannot be explained by environmental/operational conditions at that specific location.	18.2.19, Work Control Process	Prior to Period of Extended Operation	RAI B2.2.19-3
30.	Supplement the NFPA pressure and flowrate testing credited in each LRA as part of the fire protection program activity with the work control process activity in order to manage aging effects for the fire protection system piping.	18.2.7, Fire Protection Program	Prior to Period of Extended Operation	RAI B2.2.7-2