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Rules and Directives Branch
GL02-072

PROCESSED

Mr. Michael T. Lesar
Chief, Rules and Directives Branch
Office of Administration
Mail Stop T6-D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

COMMENTS ON THE THIRD YEAR OF IMPLEMENTATION OF THE REACTOR OVERSIGHT PROCESS

Dear Mr. Lesar:

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut appreciate the opportunity to provide the following comments on the third year of implementation of the reactor oversight process as requested in the Federal Register, volume 67, number 226, page 70468, on November 22, 2002.

Dominion fully supports the comments submitted by the Nuclear Energy Institute (NEI) on December 20, 2002.

Dominion would also like to point out that although the Reactor Oversight Process has done a reasonable job of focussing licensee and NRC resources on safety significant issues, there have been some noteworthy opportunities missed to further assure that plants are being operated and maintained safely. Specifically, many NRC resources continue to be used to inspect non-risk significant areas, such as excessive verification of performance indicators, and excessive inspections of areas where industry performance is at an acceptable level of safety, such as the ALARA (As Low As Reasonably Achievable) inspection module in the Occupational Radiation Safety cornerstone. These NRC resources would be better used to follow-up with generic safety issue inspections that are risk significant, such as inspection of licensee programs to ensure compliance with GL 88-05, "Boric Acid Corrosion of Carbon Steel Reactor Pressure Boundary Components in PWR Plants."

Template = ADM-013

F-RDS = ADM 03
Call = M. Manley (MSM3)

If you would like further information, please contact:

Mr. Don Olson don_olson@dom.com, or (804) 273-2830

Respectfully,

A handwritten signature in black ink, appearing to be 'S. P. Sarver', written in a cursive style.

S. P. Sarver, Director
Nuclear Licensing and Operations Support