VIRGINIA ELECTRIC AND POWER COMPANY Richmond, Virginia 23261

Re: 10 CFR 2.202

February 28, 2003

Secretary, Office of the Secretary of the Commission U.S. Nuclear Regulatory Commission ATTN: Rulemakings and Adjudications Staff Washington, D.C. 20555-0001 Serial No.: 03-143 NL&OS/ETS Docket Nos.: 50-338 50-339 License Nos.:NPF-4 NPF-7

Gentlemen:

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VIRGINIA ELECTRIC AND POWER COMPANY NORTH ANNA POWER STATION UNITS 1 AND 2 ANSWER TO ORDER FOR INTERIM INSPECTION REQUIREMENTS FOR REACTOR PRESSURE VESSEL HEADS AT PRESSURIZED WATER REACTORS DATED FEBRUARY 11, 2003

On February 11, 2003, the Nuclear Regulatory Commission (NRC) issued an Order for Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors licensees. The Order requires specific inspection of the reactor pressure vessel (RPV) head and associated penetration nozzles at pressurized water reactors (PWRs). The Commission stated that the actions in the Order are interim measures, necessary to ensure that licensees implement and maintain appropriate measures to inspect and, as necessary, repair RPV heads and associated penetration nozzles. The Order required that licensees immediately start implementation of the requirements of the Order and respond to specific actions within twenty (20) days of the date of the Order.

In accordance with Section V of the Order and 10 CFR 2.202, Virginia Electric and Power Company (Dominion) hereby submits its answer to the Order. Dominion consents to the Order as described in Section IV and does not request a hearing.

The North Anna Units 1 and 2 RPV replacement head penetration nozzles have thermal sleeves installed that could preclude 100 percent inspection coverage of the penetration nozzle base material in the area of the J-groove weld as required by Section IV.C(3)(b) of the Order. The thermal sleeves for the replacement RPV heads were designed and installed to reduce the possible interferences associated with ultrasonic or eddy current examination of the inside diameter of the penetrations; however, until the first inspections required by the Order are performed, the exact limitation on coverage cannot be established. If 100 percent coverage of the area of interest cannot be

obtained during inspection of the penetration nozzles, Dominion will seek relaxation from the inspection requirements in Section IV.C(3)(b) of the Order at that time.

If you have any questions, please contact Mr. Thomas Shaub at (804) 273-2763.

Very truly yours,

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David A. Christian Senior Vice President – Nuclear Operations and Chief Nuclear Officer

Commitments made in this letter: None

cc: U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D. C. 20555

> Mr. Samuel J. Collins, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Assistant General Counsel for Materials Litigation and Enforcement U. S. Nuclear Regulatory Commission Washington, D. C. 20555

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

Mr. S. R. Monarque NRC Project Manager North Anna Power Station

Mr. M. J. Morgan NRC Senior Resident Inspector North Anna Power Station SN: 03-143 Docket Nos.: 50-338/339 North Anna Response to RPV Head and Penetration Nozzles Inspection Order (EA-03-009)

COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by David A. Christian who is Senior Vice President – Nuclear Operations and Chief Nuclear Officer of Virginia Electric and Power Company. He has affirmed before me that he 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 his knowledge and belief.

Acknowledged before me this $\frac{28^{T_2^4}}{2}$ day of $\frac{31}{2006}$, 2003. My Commission Expires: May 31, 2006.

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Micki L. Hule

Notary Public

