

12/24/03
RDB received
(initials)

From: <Vicki_Hull@dom.com>
To: <nrcprep@nrc.gov>
Date: Mon, Dec 22, 2003 7:32 AM
Subject: Comments on the Fourth Year of Implementation of the Reactor Oversight Process (ROP)

Dominion's comments on the above subject are provided in the attached.

11/13/03
68FR64374
(6)

(See attached file: GL03-043wobc.doc)

CC: <Larry_Lane@dom.com>, <Stephen_E_Scace@dom.com>, <Mike_Gaffney@dom.com>, <Jim_Crossman@dom.com>, <David_W_Dodson@dom.com>, <Barry_Garber@dom.com>, <David_Sommers@dom.com>, <Jerry_Ashley@dom.com>, <Gary_J_Closius@dom.com>, <John_Peyton@dom.com>, <Don_Olson@dom.com>, <tch@nei.org>

Template = ADM-013

ERFDS = ADM-03
Call = R. Fratom (RKF)
M. Maley (MSH3)

December 18, 2003

Mr. Michael T. Lesar, Chief
Rules and Directives Branch
Office of Administration
Mail Stop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

GL03-043

**Comments on THE FOURTH YEAR OF IMPLEMENTATION OF THE
REACTOR OVERSIGHT PROCESS (ROP)**

Dear Mr. Lesar:

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut, Inc. (DNC) appreciate the opportunity to comment on the fourth year of implementation of the reactor oversight process (ROP) as requested in the Federal Register, volume 68, number 219, page 64374 on November 13, 2003. Our comments are as follows:

Dominion fully endorses the comments provided to you by the Nuclear Energy Institute (NEI) in their December 18, 2003 letter. We would like to emphasize one of the primary improvements of the ROP, which is to focus the resources of both the NRC and Dominion on actions related to risk significant activities at our stations. We encourage the continuation of this approach by having the NRC implement the Mitigating System Performance Index (MSPI) performance indicator in place of the Safety Systems Unavailability (SSU) performance indicator. The MSPI performance indicator should be initiated promptly in order to gain the benefits of a risk-informed performance indicator as well as eliminate the distractions from the non-risk informed SSU performance indicator.

We agree with the comments NEI provided to the 21 specific questions asked in the Federal Register Notice and have nothing to add.

If you have any questions regarding our comments, please contact:

Mr. Don Olson

don_olson@dom.com or (804) 273-2830

Respectfully,

Original signed by CLF

C. L. Funderburk, Director
Nuclear Licensing & Operations Support
Dominion Resources Services, Inc.
for Virginia Electric and Power Company and
Dominion Nuclear Connecticut, Inc.