

**VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261**

February 13, 2004

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Serial No. 04-071
NL&OS/MAE: R0
Docket Nos. 50-338/339
50-280/281
License Nos. NPF-4/7
DPR-32/37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
SURRY POWER STATION UNITS 1 AND 2
CLARIFICATION OF RESPONSE TO GENERIC LETTER 96-05
(TAC NOS. M97107, M97108, M97073, AND M97074)

In a letter dated September 17, 1999 (Serial No. 99-002A), Virginia Electric and Power Company (Dominion) resubmitted its response to Generic Letter (GL) 96-05 on periodic verification of design-basis capability of safety-related motor-operated valves. The NRC requested additional information based on that submittal in a letter dated January 6, 2000. Dominion responded to that request for additional information in a letter dated February 28, 2000 (Serial No. 00-013). The NRC transmitted their safety evaluations of our response to GL 96-05 for North Anna and Surry Power Stations in letters dated February 1, 2001 and January 18, 2001, respectively. Dominion responded to the North Anna and Surry safety evaluations by providing program clarifications in a December 7, 2001 letter (Serial No. 01-525).

In our February 28, 2000 letter, Dominion stated that stem/stem nut lubrication preventive maintenance (PM) was currently being performed every refueling outage or eighteen months, but could be extended to five years or three refueling outages based on the consideration of individual motor operated valve (MOV) design margin and actual test data. This letter also stated that the actuator gearcase grease inspection PM was being performed every refueling outage or eighteen months.

This letter clarifies our previous statements regarding specific performance frequencies for the stem/stem nut lubrication PM and the actuator gearcase grease inspection PM discussed above. Dominion's MOV Program does not limit the stem/stem nut lubrication PM or the actuator gearcase grease inspection PM to any specific frequency. The MOV Program does require that the frequency of sampling, replenishing, or analyzing the actuator main gearcase, limit switch, and valve stem lubrication shall be in accordance with the established periodicities derived from manufacturers recommendations, engineering analysis, trended machinery history, industry findings and recommendations, lessons learned, and station experience. Any revision to PM

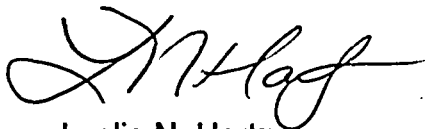
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frequency will also consider individual MOV design margin and will be supported by actual test data.

Currently, Surry Power Station has extended their stem/stem nut lubrication PM and the actuator gearcase grease inspection PM from the frequencies noted above based on the MOV Program. North Anna Power Station is considering a similar extension of these PM frequencies based on program criteria.

If you have any questions, please contact Ms. Margaret Earle at 804-273-2768.

Very truly yours,



Leslie N. Hartz
Vice President - Nuclear Engineering

Commitments made by this letter: None

cc: U.S. Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, Georgia 30303-8931

Mr. G. J. McCoy
NRC Senior Resident Inspector
Surry Power Station

Mr. M. T. Widmann
NRC Senior Resident Inspector
North Anna Power Station

Mr. C. Gratton
NRC Sr. Project Manager

Mr. S. R. Monarque
NRC Project Manager

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Subject: Clarification of Response to GL 96-05

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Leslie N. Hartz who is Vice President Nuclear Engineering of Virginia Electric and Power Company. She has affirmed before me that she 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 her knowledge and belief.

Acknowledged before me this 13th day of February, 2004.

My Commission Expires: 3/31/04.

Maggie McClure
Notary Public

