

February 24, 2005

MEMORANDUM TO: Darrell J. Roberts, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Victor Nerses, Senior Project Manager, Section 2 */RAI/*
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: MILLSTONE POWER STATION, UNIT NOS. 1, 2 AND 3; NORTH ANNA
POWER STATION, UNIT NOS. 1 AND 2; SURRY POWER STATION,
UNIT NOS. 1 AND 2 FACSIMILE TRANSMISSION, DRAFT REQUEST
FOR ADDITIONAL INFORMATION (TAC NOS. MC4414, MC4415,
MC4416, MC4417, MC4418, MC4419 AND MC4420)

The attached draft request for additional information (RAI) was transmitted by facsimile on February 24, 2005, to Mr. Paul. Willoughby, Dominion Nuclear Connecticut, Inc. (DNC). This draft RAI was transmitted to facilitate the technical review being conducted by the NRC staff and to support a conference call with Virginia Electric and Power Company (VEPCO) and DNC in order to clarify certain items in the licensee's submittal. This draft RAI is related to VEPCO's and DNC's combined submittal dated August 24, 2004, regarding a request for approval of the Nuclear Facility Quality Assurance Program Description (Topical Report DOM-AQ-1). Review of the RAI would allow VEPCO and DNC to determine and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket No. 50-280, 50-281, 50-338, 50-339, 50-245, 50-336 and 50-423

Enclosure: Draft Request for Additional Information

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Enclosure: Draft Request for Additional Information

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

MILLSTONE POWER STATION, UNIT NOS 1, 2 AND 3

NORTH ANNA POWER STATION, UNIT NOS 1 AND 2

SURRY POWER STATION, UNIT NOS 1 AND 2

DOCKET NOS 50-280, 50-281, 50-338, 50-339, 50-245, 50-336 AND 50-423

By letter dated August 24, 2004, Virginia Electric and Power Company (VEPCO) and Dominion Nuclear Connecticut, Inc. (DNC) submitted a combined request for approval of the Nuclear Facility Quality Assurance Program Description (NFQAPD) (Topical Report DOM-AQ-1). In the following, VEPCO and DNC together shall be referred to as licensee. The NRC has developed the following draft questions during its review of the letter:

General

1. Provide a matrix that describes the migration of each unit/facility current quality assurance commitments to the proposed commitments for each unit/facility. The matrix should state whether each commitment is a non-reduction, reduction, or an increase in commitment. Provide justification for all reductions in commitments. Also provide references to any safety evaluation precedents used to change existing commitments. Demonstrate that these precedents are applicable to the licensee's facilities.

Attachment 1 to NFQAPD

Attachment 1 provides the proposed NFQAPD for the licensee's facilities.

1. Section 11.2, test procedures, states "the prerequisites are normally completed prior to commencement of the test." How do you ensure the item is ready for testing if the prerequisites are not completed? What is the basis for this statement?

2. Section 13.3 provides the quality standards commitment and provides alternatives for Subpart 2.2 and subpart 2.15. What are the bases for these proposed alternatives?

3. Section 17.2, records of activities, states that the "records and their retention times are based on Regulatory Position C.2, Table 1, of NRC Regulatory Guide 1.28." The applicable revision number, i.e., Rev. 3, should be used to be consistent with the remainder of the NFQAPD.

Attachment 2 to NFQAPD

Attachment 2 provides a discussion of changes to the current Quality Assurance (QA) program for Millstone, North Anna and Surry.

1. In attachment 2, an evaluation of alternatives to committed standards is provided. Specifically, pages 5 and 6 discuss commitments to ANS-3.1 (draft 12/79) and alternatives to ANS-3.1-1993. Since the proposed NFQAPD is adopting NQA-1-1994 and ANS-3.1-1994, in part, it is not clear why the licensee has chosen to maintain its commitment to ANS-3.1 (draft

12/79). Although approved as part of the licensing basis for North Anna and Surry, the draft 12/79 ANS-3.1 standard was not endorsed by the NRC staff. Provide a discussion as to why you are maintaining your commitment to ANS-3.1 (draft 12/79) for North Anna and Surry and why ANS-3.1 (draft 12/79) is applicable to Millstone (as it appears to be in this section).

2. In attachment 2, page 8 describes an alternative to NQA-1-1994 Appendix 2A-1 regarding the use of Level I, II, and III for qualification of inspectors. As proposed, the alternative does not provide an adequate description of the education and experience requirements for those individuals performing quality control verification. Provide further description of what is meant by “the qualification program will ensure that only personnel that meet the education and experience requirements, and have demonstrated appropriate capabilities in the inspection and test activities they are assigned will be certified and used to perform those inspections” (page 13 of proposed NFQAPD). How does the proposed alternative meet the requirements of 10 CFR 50 Appendix B, Section II(Quality Assurance Program)?

3. In attachment 2, page 8 describes an alternative to NQA-1-1994 Appendix 2A-1. The alternative to the education requirement of a high school graduation is proposed to be satisfactory demonstration of reading, writing, and mathematical skills through completion of an NANT accredited training development program or an approved inspector training program for nuclear facility personnel. Provide the justification for this proposed alternative. Specifically, how is the proposed alternative equivalent to the education and experience qualifications described in section 3.1 of NQA-1-1994 Appendix 2A-1 for Level I inspectors and test personnel?

Attachment 3 to NFQAPD

Attachment 3 contains the ANSI N45.2 requirements that are addressed by NQA-1-1994 standards and/or the new QA topical report.

1. ANSI N45.2.12 section 4.3.2.7 states that specific attention should be given to corrective action on program deficiencies identified during previous audits. In the comments section of page 21 of 22 (Audits), it states that this requirement is not addressed in NQA-1 and that “corrective action is an element evaluated in each audit as stated in the NFQAPD, Appendix C.” Neither the NFQAPD or Appendix C of the NFQAPD address this requirement. Provide an explanation as to how this requirement is met in the proposed NFQAPD.

Attachment 4 to NFQAPD

Attachment 4 contains the ANSI N18.7 requirements that are addressed by NQA-1-1994 standards and/or the new QA topical report.

1. ANSI N18.7 section 2.2 Glossary of Terms contains the following terms: operational phase, surveillance testing, and system. Attachment 4 states that these definitions are contained in the NFQAPD, Appendix D. However, Appendix D does not contain these definitions.

2. ANSI N18.7 Section 5.2.2 Procedure Adherence discusses temporary changes which do not change the intent of the approved procedure. Attachment 4 states that this information is located in NFQAPD Section 6. However, Section 6 does not discuss temporary changes to approved procedures. Specify where this information is located.

3. ANSI N18.7 section 5.2.9 discusses plant security and visitor control. Attachment 4 states that “administrative controls are established through the security measures required by regulation (10 CFR 73) and NRC orders. These regulatory requirements have superceded the requirements of ANSI N18.7.” However, NFQAPD section 5.4 item (3) is a restatement of ANSI N18.7 section 5.2.9. If the requirements of ANSI N18.7 are superceded, why are they listed in NFQAPD section 5.4?

North Anna and Surry

1. Section 17.2.1.2 D.3.c describes the function of the Manager Nuclear Engineering. Where is this function located in the proposed NFQAPD?

Millstone

1. Section 1.3.9 of the current Millstone QA Program states that Unit No. 2 Nuclear Operations is responsible for operations regarding the Millstone Power Station, Unit No. 1 Spent Fuel Pool Island and auxiliary systems. Section 1.2.3.a of the proposed NFQAPD states that “the staff for operating units may be responsible for activities related to a decommissioned unit’s spent fuel pool and auxiliary systems,…” The proposed NFQAPD is no longer specific as to who is responsible for Millstone Power Station, Unit No. 1 and it could be assumed that operators at other operating facilities may have that responsibility. In addition, no basis for the change for the change was provided. Provided the basis for the change and justification for the applicability to the North Anna and Surry facilities.

2. Section 1.3.13 of the current Millstone QA Program list the radiological protection responsibilities which includes “maintaining records and reports on radioactive contamination levels.” This responsibility is not listed in section 1.2.3.2.b of the proposed NFQAPD. Since 1.2.3.2.b is the same wording as section 1.3.13, explain why this responsibility is no longer listed.

3. Section 2.1 of the current Millstone QA Program states that the “QAP applies to other quality programs including Anticipated Transient Without Scram (ATWS) Quality Assurance that is applicable to Millstone Power Station, Unit No. 2 only.... and to Electrical Equipment Qualification (EEQ), as defined by company commitments.” Basic Requirement 2 of NQA-1-1994 states that the program shall identify the activities and items to which it applies. However, section 2.2 of the proposed NFQAPD does not list the above programs as being applicable. Specify the current commitments with regards to ATWS Quality Assurance and EEQ.