

ATTACHMENT 2

RESPONSE TO REQUESTS FOR ADDITIONAL INFORMATION
PROPOSED TECHNICAL SPECIFICATIONS CHANGES ASSOCIATED WITH
THE NUCLEAR FACILITY QUALITY ASSURANCE PROGRAM DESCRIPTION

DOMINION NUCLEAR CONNECTICUT, INC.
VIRGINIA ELECTRIC AND POWER COMPANY

**RESPONSE TO REQUESTS FOR ADDITIONAL INFORMATION
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THE NUCLEAR FACILITY QUALITY ASSURANCE PROGRAM DESCRIPTION**

In letters dated September 8, 2004, and September 15, 2004, DNC and Dominion submitted requests for amendments in the form of changes to the respective station's technical specifications associated with the revision to the Quality Assurance Program.

In a facsimile dated March 10, 2005, the NRC forwarded a request for additional information (RAI) related to the DNC and Dominion submittals. The response to the RAI is provided below.

As a result of reviews conducted in conjunction with responding to the RAIs, DNC and Dominion are modifying some of the replacement technical specification pages previously submitted. The pages in question are identified in the respective responses below and new replacement pages are provided in Enclosure 1 of this letter.

North Anna Power Station, Units 1 and 2

NRC Question 1

Technical Specification (TS) 5.3.1 requires that, "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI 3.1 (12/79 Draft) for comparable positions. Exceptions to this requirement are specified in VEPCO's QA Topical Report, VEP-1, 'Quality Assurance Program, Operational Phase,'" The licensee has proposed to delete the reference to ANSI 3.1 (12/79 Draft) and replace it with "as specified in the Quality Assurance Program." This information would be relocated to the Dominion Quality Assurance Program. However no justification was provided for the proposed change. In addition, the Standard Technical Specifications (STS) for Westinghouse plants state that, "Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revision, or ANSI Standards acceptable to NRC staff]." Based on the proposed change, the NRC staff cannot ensure that the facility staff qualifications at North Anna will meet or exceed the minimum qualifications acceptable to the NRC staff. Therefore, the NRC staff has concluded that the minimum qualifications of the facility staff should remain in the TS.

Dominion Response

Dominion understands the NRC staff's position. Dominion will maintain Technical Specification 5.3.1 with the requirement that facility staff shall meet or exceed the minimum qualifications of ANS 3.1 (12/79 Draft). A corrected replacement page is included in Enclosure 1 to replace the one previously submitted.

NRC Question 2

TS 5.3.1 proposed to relocate the qualifications of the radiation protection manager from the TS to the Dominion Quality Assurance Plan. Describe programmatic controls to ensue that changes to the qualifications will require NRC review and approval prior to implementation of the changes.

Dominion Response

Dominion has a program that implements the requirements of 10 CFR 50.54(a) to control changes to the Quality Assurance Program Description. The program requires that changes to the qualifications of the radiation protection manager be evaluated to determine if the change would be considered a reduction in commitment as indicated by the regulations. If the change constitutes a reduction in commitment, then NRC review and approval is required prior to making the change. Items not considered reductions in commitment have already received NRC review and approval through either a Regulatory Guide endorsing a particular standard or a Safety Evaluation Report for a particular facility. The regulation does not allow a licensee to use a standard that was endorsed by the NRC that is older than the current commitment for the facility. Therefore, Dominion will be using more recent endorsed quality standards. Under the Dominion program, if the approval is through a Safety Evaluation Report for another facility, Dominion will ensure that the basis for the change approved through the safety evaluation is applicable to the Dominion facilities. If the basis is not applicable to the Dominion change, then it would have to be submitted to the NRC for review and approval prior to implementing the change.

Surry Power Station, Units 1 and 2

NRC Question 1

TS 6.1 is modified by proposed change C.3, which states that the responsibility of the Shift Manager for the control room command function is added for emphasis as to the importance of the position responsibility and for consistency with the North Anna TS. However, North Anna TS 5.1.2 has additional wording regarding the absence of the shift manager, which is consistent with the STS wording. The additional wording is: "During any absence of the SS from the

control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During an absence of the SS from the control room while the unit is in MODE 5 or 6, and individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.” This wording should be adopted by the licensee to maintain consistency with the North Anna TS. This additional wording should be located in TS 6.1 and not part of Table 6.1-1.

Dominion Response

The STS wording does not apply to Surry due to the absence of MODE designation. The current location of the statement in Table 6.1-1 is preferred in that the unit operating status and staffing level are located in this table. Dominion prefers to have the current wording (with title changes) remain in Table 6.1-1.

NRC Question 2

TS 6.1.B.1 requires that, “Each member of the facility staff shall meet or exceed the minimum qualifications of ANS 3.1 (12/79 Draft) for comparable positions, except for:.” The licensee has proposed to delete the reference to ANS 3.1 (12/79 Draft) and the associated footnote and replace it with “as specified in the Quality Assurance Program.” This information would be relocated to the Dominion Quality Assurance Program. However, no justification was provided for the proposed change. In addition, the STS for Westinghouse plants state that, “Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standard acceptable to NRC staff]. [The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff].” Based on the proposed change, the NRC staff cannot ensure that the facility staff qualifications at Surry will meet or exceed the minimum qualifications acceptable to the NRC staff. Therefore, the NRC staff has concluded that the minimum qualifications of the facility staff should remain in the TS.

Dominion Response

Dominion understands the NRC staff’s position. Dominion will maintain the current Technical Specification 6.1.B.1 (new TS 6.1.3.1) requirement that facility staff shall meet or exceed the minimum qualifications of ANS 3.1 (12/79 Draft). A corrected replacement page is included in Enclosure 1 to replace the one previously submitted.

NRC Question 3

TS 6.1.B.2 will be modified to state, "Incumbents in the positions of Shift Manager, Unit Supervisor (SRO), Control Room Operator (RO), and the individual providing advisory technical support to the unit operations shift crew shall meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4)." Describe how the requirements of 10 CFR 55.59(c) and 55.31(a)(4) apply to these positions. In addition, do the requirements contained in the proposed revision to TS 6.1.B.2 apply to the Shift Technical Advisor (STA)? Describe programmatic controls to ensure that changes to the retraining and replacement training programs will continue to meet or exceed the requirements and recommendations of ANS 3.1 (12/79 Draft).

Dominion Response

Per teleconference on April 20, 2005, the NRC withdrew this question. No response is necessary.

NRC Question 4

The Commission Policy Statement on Engineering Expertise on Shift established the education criteria for STAs. Where within the operating license can the education criteria for the STA be found? Describe programmatic controls to ensure that changes to the training and educational qualifications of the STA will continue to meet the Policy Statement.

Dominion Response

The education and experience requirements for the Shift Technical Advisor are contained within the Company's commitment to Regulatory Guide 1.8 and the associated ANSI/ANS standard applicable to Surry as described in the Quality Assurance Program Description. The Regulatory Guide addresses the Commission's expectations regarding engineering expertise on shift. Changes to the Quality Assurance Program Description, including the commitments for training and qualification of personnel (i.e. Regulatory Guide 1.8 and associated standards), are handled through the program described in the response to North Anna Power Station, Question 2. The revisions of Regulatory Guide 1.8 that are more recent than Rev. 1-R specifically address meeting the Commission's position regarding engineering expertise on shift. Thus, it is assured that on shift STAs will continue to meet the qualifications of the Policy Statement.

Millstone Power Station, Units 1, 2, and 3

NRC Question 1

For Millstone, Unit 1, TS 5.3.1 requires that, "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:." The licensee has proposed to delete the reference to ANSI N18.1-1971 and replace it with "as specified in the Quality Assurance Program." This information would be relocated to the Dominion Quality Assurance Program. However, no justification was provided for the proposed change. In addition, the STS for BWR/4 and BWR/6 state that "Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revision, or ANSI Standard acceptable to the NRC staff]. [The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff]." Based on the proposed change, the NRC staff cannot ensure that the facility staff qualifications at Millstone, Unit 1 will meet or exceed the minimum qualifications acceptable to the NRC staff. Therefore, the NRC staff has concluded that the minimum qualifications of the facility staff should remain in the TS.

Dominion Response

Dominion understands the NRC staff's position. Dominion will maintain Technical Specification 5.3.1 with the requirement that facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971. A corrected replacement page is included in Enclosure 1 to replace the one previously submitted.

NRC Question 2

TS 5.3.1.2, 6.3.1.c, and 6.3.1.b of Millstone, Units 1, 2, and 3, respectively, propose to relocate the qualifications of the radiation protection manager from the TS to the Dominion Quality Assurance Plan. Describe programmatic controls to ensure that changes to the qualifications will require NRC review and approval prior to implementation of the changes.

Dominion Response

Changes to the qualifications of the radiation protection manager will be evaluated through the program described in the response to North Anna Power Station, Question 2.

NRC Question 3

For Millstone, Unit 3, the licensee has proposed to delete the discussion of the STA qualifications from TS 6.4.2.1. This information is proposed to be relocated to the Dominion Quality Assurance Plan. The Commission Policy Statement on Engineering Expertise on Shift established the education criteria for STAs. Describe programmatic controls to ensure that changes to the training and educational qualifications of the STA will continue to meet the Policy Statement. In addition, STS has an additional sentence which states, "This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift." The STS wording should be adopted for consistency with the North Anna TS.

Dominion Response

In its submittal, Dominion provided markups and retyped pages for only those pages affected by the proposed changes. Page 6-3 of the Millstone Unit 3 Technical Specifications (which was not included in the submittal) contains a table with the minimum shift crew composition which shows the STA position for modes 1, 2, 3, and 4 as being a required position. There is a note at the bottom of that page associated with the STA position which states, "The STA position may be filled by an on-shift Senior Reactor Operator only if that Senior Reactor Operator meets the Shift Technical Advisor qualifications of the Commission Policy Statement on Engineering Expertise on Shift."

In addition, changes to the Quality Assurance Program Description, including the commitments for training and qualification of personnel (i.e. Regulatory Guide 1.8 and associated standards), are evaluated through the program described in the response to North Anna Power Station, Question 2. The revisions of Regulatory Guide 1.8 that are more recent than Rev. 1-R specifically address meeting the Commission's position regarding engineering expertise on shift. Thus, it is assured that on shift STAs will continue to meet the qualifications of the Policy Statement.

NRC Question 4

For Millstone, Units 2 and 3, TS 6.3.1 requires that, "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:." The licensee has proposed to delete the reference to ANSI N18.1-1971 and the associated footnote and replace it with "as specified in the Quality Assurance Program." This information would be relocated to the Dominion Quality Assurance Program. However, no justification was provided for the proposed change. In addition, the STSs state that, "Each member of the unit staff shall meet or exceed the minimum qualifications of

[Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standard acceptable to the NRC staff]. [The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff].” Based on the proposed change, the NRC staff cannot ensure that the facility staff qualifications at Millstone, Units 2 and 3 will meet or exceed the minimum qualifications acceptable to the NRC staff. Therefore, the NRC staff has concluded that the minimum qualifications of the facility staff and the associated footnote should remain in the TS.

Dominion Response

Dominion understands the NRC staff’s position. Dominion will maintain Technical Specification 6.3.1 with the requirement that facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971. A corrected replacement page is included in Enclosure 1 to replace the one previously submitted.

NRC Question 5

For Millstone, Units 2 and 3, TS 6.4 states, “A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained.” This TS requirement is no longer required as it duplicates requirement in 10 CFR. However, if this section is to be retained, describe programmatic controls to ensure that changes to the retraining and replacement training programs will continue to exceed the requirements and recommendations of ANSI N18.1-1971.

Dominion Response

Dominion’s submittal of September 8, 2004 contained marked up pages and retyped pages with the reference to ANSI N18.1-1971 replaced by, “...as specified in the Quality Assurance Program.” Therefore, TS 6.4 will state:

“A retraining and replacement training program for the facility staff that meets or exceeds the requirements as specified in the Quality Assurance Program and 10 CFR Part 55.59 shall be maintained.”

However, in response to the NRC question, Dominion personnel are trained and qualified through the National Academy for Nuclear Training (NANT) in accordance with the systematic approach to training (SAT) prescribed in 10 CFR 50.120. Continued accreditation of Dominion facilities by the Institute for Nuclear Power Operations (INPO) under the NANT program will ensure the training programs continue to exceed the requirements and recommendations of ANSI N18.1-1971.