Dominion Resources Services, Inc.
5000 Dominion Boulevard, Glen Allen, VA 23060

Dominion

August 26, 2005

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Serial No. 05-237A
NLOS/PRW R1
Docket Nos. 50-336/423
50-338/339
50-280/281
License Nos. DPR-65/NPF-49
NPF-4/7
DPR-32/37

DOMINION NUCLEAR CONNECTICUT, INC.
VIRGINIA ELECTRIC AND POWER COMPANY
MILLSTONE POWER STATION UNITS 2 AND 3
NORTH ANNA POWER STATION UNITS 1 AND 2
SURRY POWER STATION UNITS 1 AND 2
SUPPLEMENT TO RESPONSE TO NRC BULLETIN 2003-01
POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY SUMP RECIRCULATION AT PRESSURIZED-WATER REACTORS

In a letter dated August 7, 2003, Dominion Nuclear Connecticut, Inc. (DNC) and Virginia Electric and Power Company (Dominion) provided the 60-day response to Bulletin 2003-01 for Millstone Power Station Units 2 and 3 (MPS2&3), North Anna Power Station Units 1 and 2 (NAPS1&2) and Surry Power Station Units 1 and 2 (SPS1&2). The bulletin requested Dominion to either (1) state that the emergency core cooling system (ECCS) and containment spray system (CSS) recirculation functions have been analyzed with respect to the potentially adverse post-accident debris blockage effects identified in the bulletin and are in compliance with all existing applicable regulatory requirements, or (2) describe any interim compensatory measures that have been implemented or that will be implemented to reduce the interim risk associated with potentially degraded or nonconforming ECCS and CSS recirculation functions until an evaluation to determine compliance is complete.

In a conference call with DNC and Dominion on July 13, 2005, the NRC requested that supplemental information be provided regarding the Westinghouse Owners Group/Combustion Engineering Owners Group Candidate Operator Action 05 (COA 05) for refill of the refueling water storage tank during certain accident conditions. Attachment 1 of this letter provides supplemental information for MPS2&3. Attachment 2 of this letter provides supplemental information for NAPS1&2 and SPS1&2.

There are no commitments contained within this letter.

Should you have any further questions regarding this matter, please contact Mr. Paul R. Willoughby at (804) 273-3572.

Very truly yours,

Leslie N. Hartz
Vice President – Nuclear Engineering
Virginia Electric and Power Company and
Dominion Nuclear Connecticut, Inc.

Attachments (2)

cc: U.S. Nuclear Regulatory Commission
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U.S. Nuclear Regulatory Commission
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Millstone Power Station

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NRC Senior Resident Inspector
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Mr. V. Nerses
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North Anna Power Station, Surry Power Station

Mr. J. Honcharik
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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 Dominion Nuclear Connecticut, Inc. and 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 26th day of August, 2005.

My Commission Expires: May 31, 2006.

Vicki L. Hull
Notary Public

(SEAL)

Serial No. 05-237A
Docket Nos.: 50-336/423

ATTACHMENT 1

BULLETIN 2003-01, POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY SUMP RECIRCULATION AT PRESSURIZED-WATER REACTORS

SUPPLEMENT TO RESPONSE

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNITS 2 AND 3

BULLETIN 2003-01, POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY SUMP RECIRCULATION AT PRESSURIZED-WATER REACTORS
SUPPLEMENT TO RESPONSE
MILLSTONE POWER STATION UNITS 2 AND 3

In a conference call with Dominion Nuclear Connecticut, Inc. (DNC) and Virginia Electric and Power Company (Dominion) on July 13, 2005, the NRC requested that supplemental information be provided for DNC's and Dominion's response to NRC Bulletin 2003-01 . Specifically, DNC and Dominion were requested to forward information regarding the Westinghouse Owners Group (WOG)/Combustion Engineering Owners Group (CEOG) Candidate Operator Action 05 (COA 05) for refill of the refueling water storage tank during certain accident conditions. The requested supplemental information for Millstone Power Station Units 2 and 3 (MPS2&3) is provided below.

NRC Requested Information

DNC did not commit to immediately commence refill of the refueling water storage tank (RWST) per COA 05 of the WCAP-16204, Rev. 1, Evaluation of Potential ERG and EPG Changes to Address NRC Bulletin 2003-01 Recommendations (PA-SE-0085), Volume 1 – Engineering Evaluations and Analyses Report, March 2004, for Millstone Power Station Units 2 and 3. Please advise the NRC why this action was not incorporated per the COA.

DNC Response

DNC had committed to refill of the RWST in previous letters. Therefore, DNC will make the following commitments to modify its emergency procedures to incorporate the guidance of Revision 1 of WCAP 16204:

For MPS2:

DNC has reviewed the revised guidance given in Revision 1 of WCAP-16204 "Evaluation of Potential ERG and EPG Changes to Address NRC Bulletin 2003-01 Recommendations (PA-SEE-0085)" and concurs with the revised guidance that there is benefit in initiating actions to refill the RWST once injection from the RWST has stopped and the RWST has been isolated. Thus, consistent with the guidance provided in Revision 5 of CEN-152, described in Volume 3 of Revision 1 of WCAP-16204, the MPS2 Emergency Operating Procedures are being modified to initiate actions to refill the RWST once injection from the RWST has stopped and the RWST has been isolated. Implementation of this change is scheduled for completion by September 1, 2005.

For MPS3:

DNC has reviewed the revised guidance given in Revision 1 of WCAP-16204 "Evaluation of Potential ERG and EPG Changes to Address NRC Bulletin 2003-01 Recommendations (PA-SEE-0085)" and concurs with the revised guidance that there is benefit in initiating actions to refill the RWST once injection from the RWST has stopped and the RWST has been isolated. Thus, consistent with the guidance provided in DW-03-018, described in Volume 2 of Revision 1 of WCAP-16204, the MPS3 Emergency Operating Procedures are being modified to initiate actions to refill the RWST once injection from the RWST has stopped and the RWST has been isolated. Implementation of this change is scheduled for completion by September 1, 2005.

ATTACHMENT 2

BULLETIN 2003-01, POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY SUMP RECIRCULATION AT PRESSURIZED-WATER REACTORS

SUPPLEMENT TO RESPONSE

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
SURRY POWER STATION UNITS 1 AND 2

BULLETIN 2003-01, POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY SUMP RECIRCULATION AT PRESSURIZED-WATER REACTORS
SUPPLEMENT TO RESPONSE
NORTH ANNA POWER STATION UNITS 1 AND 2
SURRY POWER STATION UNITS 1 AND 2

In a conference call with Dominion Nuclear Connecticut, Inc. (DNC) and Virginia Electric and Power Company (Dominion) on July 13, 2005, the NRC requested that supplemental information be provided for DNC's and Dominion's NRC Bulletin 2003-01 response. Specifically, DNC and Dominion was requested to forward information regarding the Westinghouse Owners Group (WOG)/Combustion Engineering Owners Group (CEOG) Candidate Operator Action 05 (COA 05) for refill of the refueling water storage tank during certain accident conditions. The requested supplemental information for NAPS 1&2 and SPS 1&2 is provided below.

NRC Requested Information

Dominion did not commit to immediately commence refill of the refueling water storage tank (RWST) per COA 05 of WCAP-16204, Rev. 1, "Evaluation of Potential ERG and EPG Changes to Address NRC Bulletin 2003-01 Recommendations (PA-SE-0085), Volume 1 – Engineering Evaluations and Analyses Report," March 2004. Please advise the NRC why this action was not incorporated per the COA.

Dominion Response

For NAPS 1&2

In a letter dated August 7, 2003, Virginia Electric and Power Company (Dominion) stated the North Anna Power Station (NAPS) Units 1 and 2 design includes the capability to cross connect to the non-faulted unit's charging system. This feature provides an additional RWST volume immediately available for injection in the event of sump blockage. This sump blockage recovery strategy has been incorporated into the NAPS 1 & 2 Emergency Operating Procedures (EOPs). In addition, upon indication of sump blockage the EOPs provide guidance for refilling the faulted unit's RWST while injecting from the RWST of the non-faulted unit. This strategy is an improvement to the guidance provided in Revision 1 of WCAP-16204 "Evaluation of Potential ERG and EPG Changes to Address NRC Bulletin 2003-01 Recommendations (PA-SEE-0085)."

The guidance in Revision 1 of WCAP-16204 recommends that actions be considered for refilling the RWST once injection from the RWST has stopped and the RWST has been isolated. The intent is to provide another RWST volume

available for injection in the event that it is needed to mitigate sump blockage. In the strategy implemented at NAPS 1 & 2, the non-faulted unit's RWST volume is available without the time delay associated with filling the tank. This additional water volume will be available for the full range of possible times for sump blockage, from the time of switchover to 30 days and beyond. Once sump blockage is experienced and the non-faulted unit's RWST is being used for injection, current procedures direct operators to initiate refill of the faulted unit's RWST to provide a third RWST volume available for mitigating sump blockage. The strategy implemented at NAPS 1 & 2 not only meets the intent of the guidance in Revision 1 of WCAP-16204, but is superior in that adequate core cooling will be available to mitigate sump blockage without the time delays associated with refilling the RWST. Thus, it is concluded that the guidance for COA 05 in Revision 1 of WCAP-16204 has been fully addressed by the site specific design feature that provides for the immediate functional capability intended by the COA.

For SPS 1&2

In a letter dated August 7, 2003, Dominion stated the Surry Power Station (SPS) Units 1 & 2 design includes the capability to cross-connect to the non-faulted unit's RWST through the charging system. This feature provides an additional RWST volume immediately available for injection in the event of sump blockage. This sump blockage recovery strategy has been incorporated into the SPS 1 & 2 EOPs. In addition, upon indication of sump blockage the EOPs provide guidance for refilling the faulted unit's RWST while injecting from the RWST of the non-faulted unit. This strategy is an improvement over the guidance provided in Revision 1 of WCAP-16204.

The guidance in Revision 1 of WCAP-16204 recommends that actions be considered for refilling the RWST once injection from the RWST has stopped and the RWST has been isolated. The intent is to provide another RWST volume available for injection in the event that it is needed to mitigate sump blockage. In the strategy implemented at SPS 1 & 2, the non-faulted unit's RWST volume is available without the time delay associated with filling the tank. This additional water volume will be available for the full range of possible times for sump blockage, from the time of switchover to 30 days and beyond. Once sump blockage is experienced and the non-faulted unit's RWST is being used for injection, current procedures direct operators to initiate refill of the faulted unit's RWST to provide a third RWST volume available for mitigating sump blockage. The strategy implemented at SPS 1 & 2 not only meets the intent of the guidance in Revision 1 of WCAP-16204, but is superior in that adequate core cooling will be available to mitigate sump blockage without the time delays associated with refilling the RWST. Thus, it is concluded that the guidance for COA 05 in Revision 1 of WCAP-16204 has been fully addressed by the site specific design feature that provides for the immediate functional capability intended by the COA.