

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

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Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington, DC 20555-0001

**COMMENTS ON PROPOSED GENERIC COMMUNICATION:**  
**POST-FIRE SAFE-SHUTDOWN CIRCUIT**  
**ANALYSIS SPURIOUS ACTUATIONS**  
**(FEDERAL REGISTER, VOLUME 70, NUMBER 201,**  
**PAGES 60859-60864, DATED OCTOBER 19, 2005)**

Virginia Electric and Power Company (Dominion) appreciates the opportunity to provide comments on the Post-Fire Safe-Shutdown Circuit Analysis Spurious Actuations, as requested in the above federal register.

Please find our comments attached for your review and consideration. If you would like further information, please contact:

Mr. Dean Tolete                      Dean\_Tolete@dom.com, or (804) 273-2309 or

Mr. Don Olson                      Don\_Olson@dom.com, or (804) 273-2830

Respectfully,

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

Attachment

SFSB Review Complete  
Template - ADM-013

E-RIDS = ADM-03  
Case = A. Markley (AWM)  
R. Wolfgang (RSW1)  
A. Patel (APP)

**Comments on Proposed Generic Communication**  
**Post-Fire Safe-Shutdown Circuit Analysis Spurious Actuations**

1. Section on "Method of Compliance":

The performance of a self-assessment on multiple circuit failures consistent with Regulatory Issue Summary 2004-03, Rev. 1, should be credited as one method for re-establishing full regulatory compliance with the requirements for post safe-shutdown circuit analysis. Plants that perform this self-assessment look at most-likely failure scenarios that can result in multiple spurious actuations. This methodology provides reasonable assurance that these scenarios can determine whether one train of systems necessary to achieve and maintain hot shutdown is free of fire damage. Findings with risk significance greater than  $1E-6$  will require further considerations.