

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

February 26, 2007

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

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VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
NORTH ANNA POWER STATION UNITS 1 AND 2
REVISED ACTIONS FOR THE INSPECTION AND MITIGATION OF ALLOY 82/182
PRESSURIZER BUTT WELDS

In a January 31, 2007 letter (Serial No. 07-0035), Dominion submitted plans for inspection and mitigation of Alloy 82/182 pressurizer butt welds at North Anna Power Station Units 1 and 2. The letter also included compensatory actions until the welds were mitigated. In a February 16, 2007 phone call with North Anna plant management, the NRC discussed Dominion's commitments and compensatory actions. The NRC staff requested Dominion implement specific RCS leakage action levels and actions until mitigation is complete. This letter provides the information requested by NRC, as well as, summarizes Dominion's commitments associated with the inspection and mitigation of Alloy 82/182 pressurizer butt welds. The actions and commitments in this letter supercede the actions and commitments identified in Dominion's January 31, 2007 letter.

Butt Weld Mitigation

Dominion will complete mitigation activities on the Alloy 82/182 pressurizer butt welds during the spring 2007 refueling outage for North Anna Unit 2 and the fall 2007 refueling outage for North Anna Unit 1.

Leakage Monitoring

Dominion will perform daily measurement of unidentified leakage in Modes 1, 2, and 3 for Units 1 and 2 until mitigation of the affected pressurizer butt welds has been completed on the respective units. The following RCS unidentified leakage rate action levels have been implemented:

- 0.25 gpm unidentified leakage rate above a baseline sustained for 72 hours with at least 0.25 gpm of the change not confirmed from sources other than the pressurizer nozzle welds.

The value assigned as the baseline RCS leakage rate will be established using RCS leak rate information collected during the first seven (7) days of full power operation following the most recent bare metal visual examination of the Alloy 82/182 pressurizer butt welds.

- 0.1 gpm unidentified leakage rate change from one day to the next sustained for 72 hours with at least 0.1 gpm of the change not confirmed from sources other than the pressurizer nozzle welds.

The daily leakage rate measurement will be compared to the previous 3 days average to establish the magnitude of the change.

Leakage rate measurements will be obtained only during steady state operation. Measurements obtained during plant transient conditions will not be used.

Required Actions

Dominion will take the following actions based on RCS leak rate monitoring. If the RCS leakage remains above the baseline or daily action levels for 72 hours and the leakage is not confirmed to be from sources other than the pressurizer nozzle welds, the Unit will be placed in Mode 3 within 6 hours and Mode 5 within an additional 36 hours and a bare metal visual inspection will be performed on unmitigated pressurizer surge, spray, safety and relief nozzle butt welds and safe end butt welds containing Alloy 82/182 material.

Reporting Expectation

If either North Anna Unit 1 or 2 is shutdown due to increased unidentified leakage, Dominion will report any subsequent bare metal visual inspection results of the pressurizer nozzle butt welds and safe end butt welds containing Alloy 82/182 material within 60 days of unit restart. Further, Dominion will report within 60 days of a unit restart any 1) inspection results or 2) corrective or mitigative actions taken on pressurizer nozzle and safe end butt welds scheduled for mitigation in 2007.

Dominion will notify the NRC in writing prior to any changes made to the above commitments. These commitments will remain in effect until pressurizer surge, spray, safety and relief nozzle butt welds and safe end butt welds containing Alloy 82/182 material are mitigated.

If you have any questions or require additional information, please contact Mr. Thomas Shaub at (804) 273-2763.

Very truly yours,



David A. Christian
Senior Vice President - Nuclear Operations and
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Attachment: Commitment Summary

cc: U. S. Nuclear Regulatory Commission
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North Anna Power Station

COMMITMENT SUMMARY
INSPECTION AND MITIGATION OF ALLOY 82/182 PRESSURIZER BUTT WELDS

Commitment	Type		Scheduled Completion Date (If Required)
	One-Time Action	Continuing*	
Dominion will complete the mitigation activities of Alloy 82/182 pressurizer butt welds during the spring 2007 refueling outage for NAPS 2.	X		N2-R-18 Spring 2007
Dominion will complete the mitigation activities of Alloy 82/182 pressurizer butt welds during the fall 2007 refueling outage for NAPS 1.	X		N1-R-19 Fall 2007
Dominion will implement the unidentified RCS leakage action limits and required actions as described in this letter. The limits and actions will remain in effect until the pressurizer nozzles containing Alloy 82/182 are mitigated.		X	
If North Anna Unit 1 or 2 is shutdown due to increased unidentified leakage, Dominion will report any subsequent bare metal visual inspection results of the pressurizer nozzle butt welds and safe end butt welds containing Alloy 82/182 material within 60 days of unit restart.		X	
Dominion will report the results of corrective or mitigation actions of Alloy 82/182 pressurizer butt weld locations at North Anna 1 and 2 to the NRC within 60 days of startup from the outage during which they were performed.		X	
Dominion will notify the NRC in writing prior to any changes made to the above commitments.		X	

* The continuing commitments will remain in effect until pressurizer surge, spray, safety and relief nozzle butt welds and safe end butt welds containing Alloy 82/182 material are mitigated.