#### VIRGINIA ELECTRIC AND POWER COMPANY Richmond, Virginia 23261

#### March 22, 2007

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555 Serial No. 07-0142 NL&OS/ETS R0 Docket Nos. 50-338/339 50-280/281 License Nos. NPF-4/7 DPR-32/37

## VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION) NORTH ANNA POWER STATION UNITS 1 AND 2 SURRY POWER STATION UNITS 1 AND 2 30 DAY REPORT OF EMERGENCY CORE COOLING SYSTEM (ECCS) MODEL CHANGES PURSUANT TO THE REQUIREMENTS OF 10 CFR 50.46

In accordance with 10 CFR 50.46(a)(3)(ii), Dominion hereby submits information regarding a change to the Westinghouse Emergency Core Cooling System (ECCS) Evaluation Model for the NOTRUMP Small Break Loss of Coolant Accident (SBLOCA) analyses. This notification applies for North Anna Power Station (NAPS) Units 1 and 2 and Surry Power Station (SPS) Units 1 and 2.

Attachment 1 provides a report describing the change. Information regarding the effect of the NOTRUMP ECCS Evaluation Model change upon the reported SBLOCA analyses of record (AOR) results is provided for NAPS 1 and 2 and SPS 1 and 2 in Attachment 2. To summarize the information in Attachment 2, the calculated peak cladding temperature (PCT) for the SBLOCA analyses is increased by 85°F to a new value of 1809°F for NAPS 1 and 2 and 1845°F for SPS 1 and 2. This result represents a significant change in PCT, as defined in 10 CFR 50.46(a)(3)(i).

10 CFR 50.46(a)(3)(ii) requires the licensee to provide a report within 30 days, which includes a proposed schedule for providing a reanalysis or taking other action as may be needed to show compliance with 10 CFR 50.46. Dominion has reviewed the information provided by Westinghouse and determined that the adjusted SBLOCA PCT values and the manner in which they were derived continue to conform to the requirements of 10 CFR 50.46 with no further action. As such, Dominion considers the requirements of 10 CFR 50.46(a)(3)(ii) to be satisfied with the submission of this notification. Dominion routinely tracks adjustments to the SBLOCA and Large Break Loss of Coolant Accident (LBLOCA)

calculated PCT values to ensure that reasonable margins to the acceptance value set by 10 CFR 50.46 are maintained.

If you have any further questions regarding this submittal, please contact Mr. Thomas Shaub at (804) 273-2763.

Very truly yours,

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Eugene S. Grecheck Vice President – Nuclear Support Services

Commitments made in this letter: None

Attachments: (2)

- 1) Report of Changes in Westinghouse NOTRUMP Small Break LOCA ECCS Evaluation Model – North Anna Power Station Units 1 and 2, Surry Power Station Units 1 and 2.
- 2) 30 Day Reporting of 10 CFR 50.46 Margin Utilization North Anna Power Station Units 1 and 2, Surry Power Station Units 1 and 2.

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## **ATTACHMENT 1**

## REPORT OF CHANGES IN WESTINGHOUSE NOTRUMP SMALL BREAK LOCA ECCS EVALUATION MODEL

# NORTH ANNA POWER STATION UNITS 1 AND 2 SURRY POWER STATION UNITS 1 AND 2

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)

## Report of Changes in Westinghouse NOTRUMP Small Break LOCA ECCS Evaluation Model North Anna Power Station Units 1 and 2 Surry Power Station Units 1 and 2

## Identification of ECCS Evaluation Model Change

The current small break loss of coolant accident (SBLOCA) analyses for Westinghouse fuel in North Anna Power Station (NAPS) Units 1 and 2 and Surry Power Station (SPS) Units 1 and 2 were performed using the Westinghouse NOTRUMP SBLOCA Evaluation Model (EM). Westinghouse identified the change described below and provided the results of an assessment to determine the impact on peak cladding temperature (PCT).

### Change: NOTRUMP-EM Refined Break Spectrum

During the course of reviewing several extended power uprate and replacement steam generator SBLOCA analyses, the Nuclear Regulatory Commission (NRC) questioned the break spectrum analyzed in the NOTRUMP EM. The NRC was concerned that the resolution of the break spectrum used in the NOTRUMP EM (1.5, 2, 3, 4, and 6 inch cases) may not be fine enough to capture the worst break with regard to limiting PCT as per 10 CFR 50.46. That is, the plant could be SBLOCA limited with regard to overall LOCA results. In response to this, Westinghouse performed some preliminary work indicating that in some cases more limiting results could be obtained from non-integer break sizes; however, the magnitude of the impact was far less than that shown in preliminary work performed by the NRC. Based on this, Westinghouse performed with the 10 CFR 50.46 acceptance criteria when considering a refined SBLOCA break spectrum.

The evaluations performed by Westinghouse showed that the maximum beginning-oflife (BOL) PCT difference between integer and non-integer break sizes was 85°F. This result was reviewed and concluded to be bounding for NAPS 1 and 2 and SPS 1 and 2.

## **Conclusion**

Dominion has performed an evaluation of PCT for comparison to 10 CFR 50.46 requirements. The analysis of record (AOR) PCT for NAPS 1 and 2 is 1704°F. The AOR PCT for SPS 1 and 2 is 1717°F. Considering the current PCT change, as well as all previously reported changes and errors, the licensing basis SBLOCA PCT is 1809°F for NAPS 1 and 2 and 1845°F for SPS 1 and 2. The SBLOCA results have sufficient margin to the 2200°F limit specified in 10 CFR 50.46(b)(1). The current PCT assessment of 85°F is greater than the 50°F limit for reporting as defined in 10 CFR 50.46(a)(3)(i); hence, the change is significant and submittal of this 30 day report to the NRC is required.

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## **ATTACHMENT 2**

### 30 DAY REPORTING OF 10 CFR 50.46 MARGIN UTILIZATION

NORTH ANNA POWER STATION UNITS 1 AND 2 SURRY POWER STATION UNITS 1 AND 2

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)

	10	CFR 50.46 Margin Utiliza	<u>tion – Westinghouse</u>	Small B	reak LOCA			
Plant	Name:	North Anna Power	Station, Unit 1					
Utility Name: Virginia Electric and Power Company								
Analy	sis Info	rmation						
EM:		NOTRUMP	Limiting Break	Size:	3 Inches			
Analy	sis Date	: 1995	•					
Vende	or:	Westinghouse	Westinghouse					
FQ:		2.32	FΔH:	1.65				
Fuel:		NAIF	SGTP (%):	7				
Notes	5:	None						
				Cla	d Temp (°F)			
LICEN	<b>NSING B</b>	ASIS						
	Analys	is of Record PCT			1704			
PCT A	ASSESS	MENTS (Delta PCT)						
Α.	Prior E	ECCS Model Assessments	5					
	1.	NOTRUMP Specific Enthalpy Error			20			
	2.	SALIBRARY Double Precis	BRARY Double Precision Error Rod Initialization Error					
	3.	Fuel Rod Initialization Error						
4. Loop 5. NOTF 6. Remo		Loop Seal Elevation Error	Seal Elevation Error RUMP-Mixture Level Tracking Errors val of Part Length CRDMs					
		NOTRUMP-Mixture Level						
		Removal of Part Length CF						
	7.	NOTRUMP-Bubble Rise/D	RUMP-Bubble Rise/Drift Flux Model Inconsistencies					
В.	Planned Plant Modification Evaluations							
	1.	None			0			
_								
C.	2007 E	ECCS Model Assessments			0.5			
	1.	NOTRUMP-EM Refined Br	eak Spectrum		85			
D. Other								
	1.	None			0			
LICE	NSING E	ASIS PCT + PCT ASSESS	MENTS	PC	T = 1809			

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	10	CFR 50.46 Margin Utilization -	Westinghouse S	Small Br	eak LOCA	
Plant Name:		North Anna Power Statio	n, Unit 2			
Utility Name: Virginia Electric and Power Company						
Analys	sis Info	rmation	<u></u>			
EM:		NOTRUMP	Limiting Break S	Size:	3 Inches	
Analys	sis Date	: 1995	-			
Vendo	or:	Westinghouse				
FQ:		2.32	F∆H:	1.65		
Fuel:		NAIF	SGTP (%):	7		
Notes:	:	None				
	' <u></u>			Clad	Temp (°F)	
LICEN	SING B	ASIS				
	Analys	is of Record PCT			1704	
PCT A	SSESS	MENTS (Delta PCT)				
А.	Prior E	ECCS Model Assessments				
	1.	NOTRUMP Specific Enthalpy Er	ror		20	
	2.	SALIBRARY Double Precision E	RARY Double Precision Error			
	3.	Fuel Rod Initialization Error			10	
4. Loop Seal E		Loop Seal Elevation Error	eal Elevation Error		-44	
	5.	Removal of Part Length CRDMs	al of Part Length CRDMs			
6. NOTRUMP-Mixture Level Tra			ng Errors		13	
	1.	NOTRUMP-Bubble Rise/Drift Fil	RUMP-Bubble Rise/Drift Flux Model Inconsistencies			
D	Diann	d Plant Modification Evaluatio				
Ь.	1		115		0	
	1.	None			0	
C	2007 F	CCS Model Assessments				
•	1	NOTRUMP-FM Refined Break S	Spectrum		85	
	••				00	
D. Other						
	1.	None			0	
LICEN	ISING E	BASIS PCT + PCT ASSESSMEN	rs	PCT	r = 1809	

	10	CFR 50.46 Margin Utilization	– Westinghouse S	Small Br	eak LOCA			
Plant I	Name:	Surry Power Station, Un	it 1					
Utility Name:		Virginia Electric and Pov	Virginia Electric and Power Company					
Analys	sis Info	mation						
EM:		NOTRUMP	Limiting Break Size:		3 Inches			
Analysis Date:		: 1996						
Vendo	or:	Westinghouse						
FQ:		2.5	F∆H:	1.7				
Fuel:		SIF	SGTP (%):	15				
Notes		None						
		ACIC		<u>Clad</u>	I Temp (°F)			
LICEN	Analysi	ASIS s of Record PCT			1717			
	7 maryo				1717			
PCT A	SSESS	MENTS (Delta PCT)						
Α.	Prior E	CCS Model Assessments						
1. NOT 2. Rem		NOTRUMP - Mixture Level Trac	RUMP - Mixture Level Tracking Errors oval of Part Length CRDMs					
		Removal of Part Length CRDM						
	3.	NOTRUMP-Bubble Rise/Drift F	lux Model Inconsist	encies	35			
B. Planned Plant Modification Evaluations								
	1.	Westinghouse IFBA Fuel Produ	act Implementation		10			
C	2007 F	CCS Model Assessments						
0.	1.	NOTRUMP-EM Refined Break	Spectrum		85			
<b>D</b>	<b>O</b> 4h							
D.	Utner	None			0			
	1.				0			
LICEN	ISING B	ASIS PCT + PCT ASSESSMEN	ITS	PCT	= 1845			

	10	CFR 50.46 Margin Utilization -	Westinghouse	Small B	reak LC	AOCA		
Plant	Name:	Surry Power Station, Unit	2					
Utility	Name:	Virginia Electric and Pow	Virginia Electric and Power Company					
Analy	sis Info	mation						
EM:		NOTRUMP	Limiting Break	Size:	3 Inch	es		
Analysis Date:		: 1996						
Vendor:		Westinghouse						
FQ:		2.5	FΔH:	1.7				
Fuel:		SIF	SGTP (%):	15				
Notes	:	None						
			_	Cla	d Temp	<u>) (°F)</u>		
LICEN	ISING E	ASIS						
	Analys	s of Record PCT				1717		
PCT ASSESSMENTS (Delta PCT)   A. Prior ECCS Model Assessments   1. NOTRUMP - Mixture Level Tracking Errors 1				13				
2. Remo		Removal of Part Length CRDMs	Val of Part Length CRDMs			-15		
	3.	NOTROMP-Buddle Rise/Drift Fit		lencies		35		
В.	Planne 1.	ed Plant Modification Evaluatio Westinghouse IFBA Fuel Produc	<b>ns</b> ct Implementation			10		
C.	<b>2007 E</b> 1.	CCS Model Assessments NOTRUMP-EM Refined Break S	spectrum			85		
D.	<b>Other</b> 1.	None				0		
LICEN	NSING E	ASIS PCT + PCT ASSESSMEN		PC	T =	1845		