



May 7, 2007

United States Nuclear Regulatory Commission
Attention: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Serial No. 07-0268
NL&OS/TJS R2
Docket Nos. 50-280, 281
50-338, 339
50-336, 423
50-305
License Nos. DPR-32, 37
NPF-4, 7
DPR-65
NPF-49
DPR-43

VIRGINIA ELECTRIC AND POWER COMPANY
DOMINION NUCLEAR CONNECTICUT, INC.
DOMINION ENERGY KEWAUNEE, INC.
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
MILLSTONE POWER STATION UNITS 2 AND 3
KEWAUNEE POWER STATION
RESPONSE TO GENERIC LETTER 2007-01, INACCESSIBLE OR UNDERGROUND
POWER CABLE FAILURES THAT DISABLE ACCIDENT MITIGATION SYSTEMS OR
CAUSE PLANT TRANSIENTS

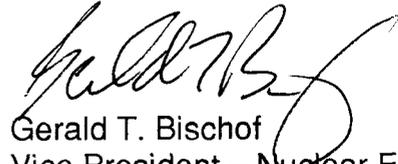
In accordance with 10 CFR 50.54(f), Virginia Electric and Power Company, Dominion Nuclear Connecticut, Inc. and Dominion Energy Kewaunee, Inc. (collectively, Dominion) are providing the attached response to NRC Generic Letter 2007-01, Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients, issued February 7, 2007.

Attachment 1 provides the requested information for GL 2007-01, Question 1, concerning Dominion's fleet history with regards to inaccessible or underground power cable failures.

Attachment 2 provides the requested information for GL 2007-01, Question 2, concerning Dominion's fleet inspection, testing, and monitoring programs to detect degradation of inaccessible or underground power cables.

Please contact Mr. David A. Sommers at (804) 273-2823 if you have any questions or require additional information.

Very truly yours,



Gerald T. Bischof
Vice President – Nuclear Engineering
Virginia Electric and Power Company
Dominion Nuclear Connecticut, Inc.
Dominion Energy Kewaunee, Inc.

Attachments:

Attachment 1 - Dominion Fleet Response: GL 2007-01, Question 1

Attachment 2 - Dominion Fleet Response: GL 2007-01, Question 2

Commitments made in this letter: None

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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 Gerald T. Bischof, who is Vice President - Nuclear Engineering, of Dominion Resources Services, Inc. He has affirmed before me that he 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 his knowledge and belief.

Acknowledged before me this 7TH day of May, 2007.
My Commission Expires: May 31, 2010.

Vicki L. Hull
Notary Public

(SEAL)

Attachment 1

Serial No. 07-0268

SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
MILLSTONE POWER STATION UNITS 2 AND 3
KEWAUNEE POWER STATION

DOMINION FLEET RESPONSE: GL 2007-01, QUESTION 1

VIRGINIA ELECTRIC AND POWER COMPANY
DOMINION NUCLEAR CONNECTICUT, INC.
DOMINION ENERGY KEWAUNEE, INC.

GL 2007-01, Question 1:

Provide a history of inaccessible or underground power cable failures for all cables that are within the scope of 10 CFR 50.65 (the Maintenance Rule) and for all voltage levels. Indicate the type, manufacturer, date of failure, type of service, voltage class, years of service, and the root causes of the failure.

The Nuclear Energy Institute (NEI), working in conjunction with the NRC's Electrical Engineering Branch, developed guidance for licensees to use in responding to GL 2007-01 (NEI to industry letter dated 03/16/07, Guidance for Response to GL 2007-01). This guidance was used to compile the Dominion fleet response detailed in the following table.

Specifically, the following responses were compiled by searching multiple electronic databases that are currently in use as well as some older electronic databases for which the information of interest was readily available. These database searches were constructed to identify power cable failures in voltage ranges at or above 480 VAC. Examples of the databases searched include Licensee Event Reports (LERs), corrective action system, work orders, design change packages, engineering work requests and engineering transmittals.

**Generic Letter 2007-01, Question 1
 Dominion Fleet Cable Failure Summary
 Failed Cables**

Site/ Date of Failure/ (In-service Date)	Failed In-service or During Testing	Cable Producer	Cable Type		Type of Service			Nominal Cable Voltage Rating	Root Causes of Failure
			Insulation Type	Shielded	Normally Energized	Equipment Identifier (mark #)	Nominal Service Voltage		
NAPS/ 05/1985 (In-service since 4/78)	During testing	General Cable	EPR (Ethylene Propylene Rubber)	No	Yes	1-SW-P-1B [Service Water Pump]	4160V	5kV	Unknown / Discovered investigating low Polarization Index (PI) values for cable/motor
NAPS/ 6/24/88 (In-service since 4/78)	In-service	General Cable	EPR	No	Yes	2-SW-P-1A [Service Water Pump]	4160V	5kV	Presence of water in the manholes and ducts resulted in the formation of water blisters
NAPS/ 9/12/99 (In-service since 1981)	In-service	Essex	XLPE (Cross-linked Polyethylene)	No	Yes	1-EP-ST-1G3 [Unit Sub-station]	4160V	5kV	Unknown
SPS/ 10/20/93 (In-service since 1983)	In-service	Reynolds	XLPE	Yes	Yes	1-EP-TX-1G [Circ. Water Pump Transformer]	34.5kV	35kV	Unknown
MPS	No cable failures meeting search criteria identified.								
KPS	No cable failures meeting search criteria identified.								

Attachment 2

Serial No. 07-0268

SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
MILLSTONE POWER STATION UNITS 2 AND 3
KEWAUNEE POWER STATION

DOMINION FLEET RESPONSE: GL 2007-01, QUESTION 2

VIRGINIA ELECTRIC AND POWER COMPANY
DOMINION NUCLEAR CONNECTICUT, INC.
DOMINION ENERGY KEWAUNEE, INC.

GL 2007-01, Question 2:

Describe inspection, testing and monitoring programs to detect the degradation of inaccessible or underground power cables that support EDGs, offsite power, ESW, service water, component cooling water and other systems that are within the scope of 10 CFR 50.65 (the Maintenance Rule).

Cable testing within the Dominion fleet principally involves megger testing. This testing is performed either with the load remaining connected or with the load disconnected. Surry, North Anna and Kewaunee Power Stations perform megger testing during equipment preventive maintenance for equipment and cable together and for cable after new cable pulls. Millstone performs megger testing during equipment preventive maintenance for equipment only.

Other cable testing methodologies are employed within the Dominion fleet on a less frequent basis than megger testing. These testing methods are outlined below:

Surry and North Anna: Performs DC high-potential (hi-pot) testing on the cable after new cable pulls. Also performs polarization index (PI) testing during equipment preventive maintenance for equipment and cable together.

Millstone: Surge capacitance testing is performed during equipment preventive maintenance for the equipment and cable together. DC high-potential (hi-pot) testing is performed for equipment and cable together after new cable pulls.