

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 27, 2007

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 07-0626
NL&OS/ETS R0
Docket Nos. 50-338/339
License Nos. NPF-4/7

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
NORTH ANNA POWER STATION UNITS 1 AND 2
IMPLEMENTATION OF RESPONSE TIME TESTING/VERIFICATION
PURSUANT TO WCAP-13632-P-A, REV. 2 AND WCAP-14036-P-A, REV. 1

On April 5, 2002, the NRC approved the North Anna Unit Power Station (NAPS) Unit 1 and 2 conversion to Improved Technical Specifications (ITS), as amendments 232 and 212, respectively. In the NAPS ITS submittal, Dominion proposed changing the definition of both the Engineered Safety Features (ESF) and Reactor Trip System (RTS) Response Time to permit verification of response times consistent with TSTF-111. The NAPS ITS submittal also specifically identified that Dominion had not yet performed the evaluations required by the WCAPs, nor met the generic NRC SER conditions required to implement a verification process in place of time response testing. With these two limitations identified, the NRC approved the change in ITS as a less restrictive change.

Dominion has now completed a technical evaluation of the ESF and RTS instrumentation circuitry in accordance with the methodology prescribed in the WCAP-13632-P-A, Revision 2, "Elimination of Pressure Sensor Response Time Testing Requirements," and WCAP-14036-P, Revision 1, "Elimination of Periodic Protection Channel Response Time Tests," which were approved by the NRC on September 5, 1995 and October 6, 1998, respectively. This technical evaluation ensured that the sensors, Process Protection System (7300), Solid State Protection System (SSPS) and Nuclear Instrumentation System (NIS) were enveloped by the generic analyses of the WCAPs and met the conditions of the generic NRC SER to permit implementation of a verification process for response times.

This letter is to notify the NRC that North Anna has completed applicable Bases and UFSAR changes to include the information identified in TSTF-111 and has documented the verification process for the ESF and RTS circuitry. The implementation of the verification of response times process as well as the associated Bases and UFSAR changes have been made in accordance with 10 CFR 50.59 based on the previous ITS approval.

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

Very truly yours,



Gerald T. Bischof
Vice President – Nuclear Engineering

cc: U.S. Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Suite 23T85
Atlanta, Georgia 30303

Mr. J. E. Reasor, Jr.
Old Dominion Electric Cooperative
Innsbrook Corporate Center
4201 Dominion Blvd.
Suite 300
Glen Allen, Virginia 23060

Mr. J. T. Reece
NRC Senior Resident Inspector
North Anna Power Station

Mr. S. P. Lingam
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

Mr. R. A. Jervey
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852