

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 9, 2007

ATTN: Document Control Desk
Director Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Serial No. 07-0661
NL&OS/TJS R2
Docket No. 72-56

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
NORTH ANNA POWER STATION GENERAL LICENSE ISFSI
REQUEST TO CREDIT PRIOR WELDING, REOPENING, TRANSFER AND RETRIEVAL
DEMONSTRATIONS DURING GENERAL LICENSE ISFSI DRY RUN

Pursuant to the requirements of the NUHOMS HD Model 32PTH Dry Shielded Canister (DSC) Certificate of Compliance (CoC) 72-1030, Condition 8, and in order to satisfy the requirements of a general license to operate an Independent Spent Fuel Storage Installation (ISFSI) under 10 CFR 72, Subpart K – General License for Storage of Spent Fuel at Power Reactor Sites, Dominion's North Anna Power Station (NAPS) must perform a dry run training exercise. NAPS plans to use the NUHOMS HD Model 32PTH DSC with the concrete Model HSM (Horizontal Storage Module)-H. Dominion requests that the requirements for specific demonstration of the following operations be waived for the NAPS dry run:

1. DSC sealing (CoC 72-1030, Condition 8.b)
2. Opening of a DSC (CoC 72-1030, Condition 8.g)
3. DSC transfer to the HSM-H (CoC 72-1030, Condition 8.d)
4. DSC retrieval from the HSM-H (CoC 72-1030, Condition 8.e)

The specific exercise of sealing a DSC (CoC 72-1030, Condition 8.b), using the automated welding process selected by Dominion for use at NAPS, was previously demonstrated on a Model 32PTH DSC mockup at Surry Power Station (SPS). The SPS demonstration was performed by the same contract specialty welding company, PCI Energy Services, Inc. (PCI), using the same welding processes and leak detection testing methods that are being contracted for use at NAPS. In addition, PCI has demonstrated proficiency in the 32PTH canister welding process with the Dominion-approved procedure set at SPS during its recent canister loading campaigns.

NAPS also intends, if necessary, to use existing PCI milling process procedures to reopen a loaded DSC's inner and outer lids (CoC 72-1030, Condition 8.g). As documented in NRC Inspection Report 0720005/2004-001, this process and associated procedures were successfully demonstrated to the NRC by PCI for Point Beach Nuclear Power Plant. Furthermore, demonstration of the milling process was not

required of Dominion at SPS since the same equipment and processes that were previously reviewed by the NRC at Point Beach were to be employed to open a previously sealed DSC at SPS. This was documented by the NRC in the SPS initial dry run inspection report. NAPS will use the same model NUHOMS HD 32PTH DSCs as SPS. In addition, NAPS will be implementing the same procedures as SPS for their 32PTH DSCs' reopening processes under CoC 72-1030.

Transferring a DSC to an HSM-H module (CoC 72-1030, Condition 8.d) was previously demonstrated to the NRC with a Model 32PTH DSC at SPS in June 2007 using the same loading crew that will be performing this function at NAPS. Although the transfer equipment that will be used at North Anna is separately owned by NAPS, it is identical in design and function to the transfer equipment used at SPS during the dry run demonstration and initial NUHOMS loading campaign. The Surry / North Anna loading crew continued to demonstrate proficiency in transferring a 32PTH canister during the initial SPS canister loading campaign.

Retrieving a DSC from an HSM-H module (CoC 72-1030, Condition 8.e) was previously demonstrated to the NRC with a Model 32PTH DSC at SPS in June 2007 using the same loading crew that will be performing this function at NAPS. As stated above, the transfer equipment that will be used at NAPS is identical in design and function to the transfer equipment used at SPS. Consistent with our request not to demonstrate transfer of a DSC to an HSM-H module, Dominion requests that demonstration of subsequent DSC retrieval from an HSM-H module be waived.

Section 03.03 of NRC Inspection Procedure 60854, "Preoperational Testing of an Independent Spent Fuel Storage Installation," provides guidance, in part, that states "Dry runs of cask or canister movements should simulate the maximum expected weight, including water, as closely as possible." In past dry run testing at both SPS and Dominion's Millstone Power Station (MPS), dummy fuel loads were inserted in the DSCs used during the dry run tests. Due to schedule conflicts with another utility with a concurrent need for the same dummy fuel loads, the dummy fuel loads will not be available for use in the DSC during the dry run testing. However, SPS has demonstrated that the NUHOMS transfer equipment in its possession is capable of handling the 32PTH DSC with the dummy fuel load. As already stated, the transfer equipment that will be used at NAPS is identical in design and function to the transfer equipment used at SPS. Therefore, the transfer equipment used at NAPS is considered to be fully capable of manipulating a fully loaded DSC. Additionally, the in-plant cask handling equipment at NAPS has been used to load twenty-seven TN-32 dry storage casks since 1998. The weight of a fully loaded TN-32 dry storage cask and a fully loaded NUHOMS OS187H transfer cask with 32PTH canister is similar. Therefore, the in-plant handling equipment at NAPS has been demonstrated as being fully capable of handling a loaded NUHOMS transfer cask and canister.

Based on previous successful demonstrations and the supporting information provided above, Dominion requests that specific demonstration of NUHOMS HD Model 32PTH

DSC sealing, opening, transfer and retrieval be waived for the NAPS general license ISFSI dry run. Additionally, in order to support our scheduled NRC-evaluated dry run at NAPS during February 2008, Dominion seeks approval of these requests by December 15, 2007.

Please contact Mr. Thomas Szymanski at (804) 273-3065 if you have any questions or require additional information.

Sincerely,



Gerald T. Bischof
Vice President – Nuclear Engineering

Attachments: None

Commitments made in this letter: None

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