

February 15, 2008

Mr. Gerald T. Bischof
Vice President - Nuclear Engineering
Virginia Electric and Power Company
North Anna Power Station
5000 Dominion Boulevard
Glen Allen, VA 23060

SUBJECT: REQUEST FOR NRC POSITION ON DRY RUN ACTIVITIES FOR THE
NUHOMS® HD DRY CASK STORAGE SYSTEM AT THE NORTH ANNA
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

Dear Mr. Bischof:

On November 9, 2007, you submitted a letter to the U.S. Nuclear Regulatory Commission (NRC) on behalf of the Virginia Electric and Power Company (Dominion), the licensee for the North Anna Power Station and the associated independent spent fuel storage installation (ISFSI), regarding your plans for additional dry cask storage of spent fuel at the North Anna ISFSI. In your letter, you stated that Dominion will use the Transnuclear Inc., NUHOMS® HD storage system (Docket No. 72-1030) under the general license provisions of 10 CFR Part 72. You also requested that NRC waive certain requirements identified in the Certificate of Compliance (CoC) for the NUHOMS® HD system (CoC No. 1030) that address pre-operational testing and training exercise, or "dry run," activities. You further requested NRC approval by December 15, 2007, in order to support your planned schedule for conducting the dry run activities in February 2008.

The subject requirements are found in Condition 8 of CoC No. 1030 for the NUHOMS® HD system, which reads as follows:

"8. PRE-OPERATIONAL TESTING AND TRAINING EXERCISE

A dry run training exercise of the loading, closure, handling, unloading, and transfer of the NUHOMS® HD System shall be conducted by each licensee prior to the first use of the system to load spent nuclear fuel assemblies. The training exercise shall not be conducted with spent nuclear fuel in the canister. The dry run may be performed in an alternate step sequence from the actual procedural guidelines in Chapter 8 of the SAR. The dry run shall include but not be limited to the following:

Loading Operations

- a. Fuel Loading
- b. DSC sealing, drying, and backfilling operations
- c. TC downending and transport to the ISFSI
- d. DSC transfer to the HSM-H

Unloading Operations

- e. DSC retrieval from HSM-H
- f. Flooding of DSC
- g. Opening of DSC"

You specifically requested a waiver from demonstrating the activities identified in Conditions 8.b, 8.d, 8.e, and 8.g, above. You stated that the sealing process for the dry shielded canister (DSC), and the transfer to and retrieval from a horizontal storage module of a DSC (Conditions 8.b, d, and e, respectively), have been previously demonstrated at the Surry Power Station for the same cask system. The same contract specialty welding company, PCI Energy Services Inc. (PCI), used by Dominion to perform the canister sealing demonstration and operations at Surry, will be used again at North Anna. The same personnel that performed loading operations and the unloading demonstration at Surry will perform the same types of loading operations using identical equipment and the same cask design at North Anna.

With respect to Condition 8.g, you stated that PCI previously demonstrated the procedures to be used to reopen a welded DSC at another site, and that the NRC accepted the prior demonstration of that capability in its recent dry cask storage inspections (June-September, 2007) conducted at the Surry Power Station.

The NRC has determined that our formal review and approval of your request is not required. Instead, we consider your letter to be a description of the bases for your determination that you will meet the requirements of Condition 8 of CoC No. 1030 for the use of the NUHOMS® HD System at the North Anna Power Station. Consistent with this position, and based on our past practice, the NRC staff will assess your compliance with the CoC requirements and applicable regulations during the planned dry run inspection at North Anna. We note that the bases you provided regarding the demonstration of the dry run activities appear reasonable, and that the NRC has found that similar measures were in compliance with CoC requirements in prior inspections.

While we have determined that no formal NRC approval is required in this case, we appreciate your early communication of these issues to the staff. We encourage you, as you did in this instance, to contact our staff in the Division of Spent Fuel Storage and Transportation in the NRC's Office of Nuclear Material Safety and Safeguards if you have any future questions regarding dry run demonstrations for dry cask storage systems. This will enable us to coordinate the agency's position with NRC regional inspection staff, to ensure consistency.

If you have any questions about this letter, please call me at 301-492-3319.

Sincerely,

/RA/

James R. Hall, Senior Project Manager
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

Docket Nos. 72-16, 72-56

cc: Mailing List

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North Anna Power Station
Dockets 72-16 and 72-56

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