



May 22, 2008

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

Serial No. 08-0275A  
NL&OS/GDM R0  
Docket Nos. 50-305  
50-336/423  
50-338/339  
50-280/281  
License Nos. DPR-43  
DPR-65/NPF-49  
NPF-4/7  
DPR-32/37

**DOMINION ENERGY KEWAUNEE, INC. (DEK)**  
**DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**  
**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**  
**KEWAUNEE POWER STATION**  
**MILLSTONE POWER STATION UNITS 2 AND 3**  
**NORTH ANNA AND SURRY POWER STATION UNITS 1 AND 2**  
**NRC GENERIC LETTER (GL) 2004-02, POTENTIAL IMPACT OF DEBRIS**  
**BLOCKAGE ON EMERGENCY RECIRCULATION DURING DESIGN BASIS**  
**ACCIDENTS AT PRESSURIZED-WATER REACTORS**  
**REQUEST FOR INTERIM EXTENSION OF COMPLETION DATES FOR**  
**CORRECTIVE ACTIONS**

In a letter dated November 15, 2007 (Serial No. 07-0660), DEK, DNC and Dominion submitted schedule extension requests for Kewaunee, Millstone Units 2 and 3, North Anna Units 1 and 2 and Surry Units 1 and 2 to extend the completion date for corrective actions associated with GL 2004-02. The request was primarily for the completion of downstream effects evaluations and chemical effects testing and evaluation. The requested extension dates were June 30, 2008 for Kewaunee and November 30, 2008 for Millstone, North Anna and Surry. In a letter dated December 13, 2007, the NRC granted DEK, DNC and Dominion an extension to May 31, 2008 for each plant citing the importance of prompt closure of GL 2004-02 and the potential for schedule improvement.

Considerable effort and resources have been expended to complete the outstanding corrective actions for each station by the approved extension date, and significant progress has been made towards the resolution of the remaining GSI-191 issues. However, it has become evident that all of the remaining corrective actions cannot be completed by May 31, 2008. In a letter dated

May 21, 2008 (Serial No. 08-0275), DEK, DNC and Dominion requested an extension until September 30, 2008 to complete the GL 2004-02 corrective actions for Kewaunee, Millstone Units 2 and 3, North Anna Units 1 and 2, and Surry Units 1 and 2. The requested extension period is to complete the remaining chemical effects testing and evaluation and downstream effects analyses.

In order to support NRC review of the May 21, 2008 extension request and the accompanying detailed justifications, we request approval of an interim schedule extension until June 30, 2008. The interim extension request is supported by the previous extension request bases included in the November 15, 2007 letter, which addressed the three criteria contained in SECY-06-0078 dated March 31, 2006, "Criteria for Evaluating Delay of Hardware Changes," and the applicable elements of the NRC justification for continued operation in the "Summary of July 26-27, 2001 Meeting with Nuclear Energy Institute and Industry on ECCS Strainer Blockage in PWRs," dated August 14, 2001 for each plant. The bases included in the November 15, 2007 letter remain valid and applicable for this interim, short-term extension request and continue to confirm, that Kewaunee, Millstone Units 2 and 3, North Anna Units 1 and 2, and Surry Units 1 and 2 will continue to meet their current plant licensing bases regarding the function and operability of the containment sumps during the period of the requested extensions in that:

- The plants have completed considerable physical and analytical activities to provide a high level of Emergency Core Cooling System (ECCS) and Recirculation Spray (RS) System (as applicable) performance including replacing the ECCS and RS strainers,
- The plants have implemented mitigative measures to minimize the risk of degraded ECCS and RS (as applicable) functions during the extension period, and
- The plants have plant-specific plans with milestones and schedules to address the outstanding technical issues with sufficient conservatism to address uncertainties.

Finally, even though a detailed, quantitative risk assessment is not required for short-term extension requests, the plant risk evaluations provided in our November 15, 2007 letter determined that the risk was "small" and bound the risk associated with the interim extension period requested herein.

Therefore, DEK, DNC and Dominion have established that there is reasonable assurance during this requested interim period that Kewaunee, Millstone Units 2



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