

July 23, 2003

Mr. Gerald T. Bischof  
Vice President Nuclear Engineering  
Virginia Electric and Power Company  
Dominion Nuclear Connecticut, Inc.  
Dominion Energy Kewaunee, Inc.  
Glen Allen, Virginia 23060

SUBJECT: KEWAUNEE POWER STATION, MILLSTONE POWER STATION, UNITS 2 AND 3, NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2, AND SURRY POWER STATION, UNIT NOS. 1 AND 2 - GENERIC LETTER 2008-01, "MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS," RESPONSE TO EXTENSION REQUEST (TAC NOS. MD7838, MD7845, MD7846, MD7850, MD7851, MD7884 AND MD7885)

Dear Mr. Bischof:

On January 11, 2008, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the "subject systems") are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the "9-month submittal") of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the "3-month submittal") of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

By letter dated May 8, 2008, Dominion Energy Kewaunee, Inc., Dominion Nuclear Connecticut, Inc., and Virginia Electric and Power Company (the licensees), submitted a 3-month response to GL 2008-01 for Kewaunee Power Station (Kewaunee), Millstone Power Station, Units 2 and 3 (Millstone 2 and 3), North Anna Power Station, Unit Nos. 1 and 2 (North Anna 1 and 2), and Surry Power Station, Unit Nos. 1 and 2 (Surry 1 and 2), and proposed alternative actions to the 9-month response date of October 11, 2008, for Millstone 3, North Anna 1 and 2, and Surry 1. The NRC staff's assessment of the response for Millstone 3, North Anna 1 and 2, and Surry 1 is contained in the Enclosure.

The NRC staff reviewed the licensees' proposed alternative course of action and concluded that for Millstone 3, North Anna 1 and 2, and Surry 1, with the exception of the clarifications and associated requests discussed in the Enclosure, it is acceptable. This letter allows the licensee to

G. Bischof

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implement its proposed alternative course of action provided that implementation is consistent with the clarifications and associated requests discussed in the Enclosure.

This letter does not alter or change the requested 9-month response date of October 11, 2008, for Kewaunee, Millstone 2 and Surry 2.

If you have any questions regarding this issue, please contact Siva P. Lingam, your assigned Project Manager, at 301-415-1564 or, via email, at [Siva.Lingam@nrc.gov](mailto:Siva.Lingam@nrc.gov).

Sincerely,

***/RA/***

Melanie C. Wong, Chief  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-305, 50-336, 50-423,  
50-338, 50-339, 50-280 and 50-281

Enclosure:  
Assessment of 3-month response

cc w/encl: See next page

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This letter does not alter or change the requested 9-month response date of October 11, 2008, for Kewaunee, Millstone 2 and Surry 2.

If you have any questions regarding this issue, please contact Siva P. Lingam, your assigned Project Manager, at 301-415-1564 or, via email, at Siva.Lingam@nrc.gov.

Sincerely,

**/RA/**

Melanie C. Wong, Chief  
Plant Licensing Branch II-1  
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Enclosure:  
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ASSESSMENT OF 3-MONTH RESPONSE  
TO GENERIC LETTER 2008-01  
KEWAUNEE POWER STATION,  
MILLSTONE POWER STATION, UNITS 2 AND 3,  
NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2, AND  
SURRY POWER STATION, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-305, 50-336, 50-423, 50-338, 50-339, 50-280, AND 50-281

1.0 Background

On January 11, 2008, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the "subject systems") are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance. Specifically, the GL requested licensees to provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the "9-month submittal") of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the "3-month submittal") of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

2.0 Licensee's Proposed Alternative Course of Action

By letter dated May 8, 2008 (ADAMS Accession No. ML081300282), Dominion Energy Kewaunee, Inc., Dominion Nuclear Connecticut, Inc., and Virginia Electric and Power Company (the licensees), submitted a 3-month response to GL 2008-01 for Kewaunee Power Station (Kewaunee), Millstone Power Station, Units 2 and 3 (Millstone 2 and 3), North Anna Power Station, Unit Nos. 1 and 2 (North Anna 1 and 2), and Surry Power Station, Unit Nos. 1 and 2 (Surry 1 and

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2), and proposed alternative actions to the 9-month response date of October 11, 2008, for Millstone 3, North Anna 1 and 2, and Surry 1. The licensees indicate that they will provide a 9-month response to GL 2008-01, consistent with the GL's requested schedule by October 11, 2008, that will address the required aspects of the GL for Millstone 3, North Anna 1 and 2, and Surry 1. This letter does not alter or change the requested 9-month response date of October 11, 2008, for Kewaunee, Millstone 2 and Surry 2. However, the licensees request additional time after completion of the confirmatory walkdown in the following scheduled refueling outages to submit supplemental response for Millstone 3, North Anna 1 and 2, and Surry 1:

Millstone 3	fall 2008
North Anna 2	fall 2008
North Anna 1	spring 2009
Surry 1	spring 2009

As an alternative course of action, the licensees provide the following commitments for completion of the GL response for Millstone 3, North Anna 1 and 2, and Surry 1:

1. Provide a supplemental response to GL 2008-01 by January 15, 2009, for Millstone 3 and North Anna 2.
2. Provide a supplemental response to GL 2008-01 by July 15, 2009, for North Anna 1 and Surry 1.

### 3.0 NRC staff Assessment

The NRC staff finds that for Millstone 3, North Anna 1 and 2, and Surry 1, with the exception of the clarifications and associated requests discussed below, the licensee's proposed alternative course of action is acceptable.

The NRC staff notes that the licensee's May 8, 2008, response does not clearly describe the content to be provided in its 9-month submittals. The NRC staff requests that the licensee submit the information requested in the GL as follows:

- (1) 9-Month Initial Submittal - For the portions of the subject systems that are accessible prior to the refueling outages in accordance with the schedule listed in Section 2.0 of this evaluation for Millstone 3, North Anna 1 and 2, and Surry 1, provide all GL requested information to the NRC by October 11, 2008.
- (2) 9-Month Supplemental (Post-Outage) Submittal - Except for the long-term items described below, provide all remaining GL requested information for the subject systems to the NRC by January 15, 2009, for Millstone 3 and North Anna 2, and July 15, 2009, for North Anna 1 and Surry 1.

For each of these two submittals (the 9-month initial and supplemental submittals), and consistent with the information requested in the GL, the licensees should provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions,

and the basis for that schedule.

The NRC staff noted that the licensee's submittal dated May 8, 2008, did not mention other potential long-term actions that are identified in the GL. For instance, the industry is assessing whether it is necessary to perform pump testing to determine the allowable limits on ingested gas volume in pump suction piping, as well as, whether analysis development is needed to assess gas transport in the subject system piping as a function of system flow. It is unlikely this industry effort will be complete for the 9-month initial or supplemental submittals. Further, technical specification changes may be necessary to reflect the improved understanding achieved during response to the GL, but these cannot be fully developed for the 9-month initial or supplemental submittals. A Technical Specifications Task Force traveler may provide a generic example that can be adopted by licensees. The NRC staff requests that the licensees address in its 9-month submittal how it plans to track such long-term actions (e.g., Corrective Action Program and/or commitment tracking). The NRC plans to perform follow up inspections of licensees' responses to GL 2008-01 at all plants using a Temporary Instruction inspection procedure.

Date: July 23, 2008