

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

January 15, 2009

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

Serial No.	08-0013F
NLOS/ETS	R0
Docket No.	50-339
License No.	NPF-7

**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**  
**NORTH ANNA POWER STATION UNIT 2**  
**SUPPLEMENTAL RESPONSE TO NRC GENERIC LETTER 2008-01, MANAGING GAS**  
**ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND**  
**CONTAINMENT SPRAY SYSTEMS - INACCESSIBLE AREAS**

The Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01 on January 11, 2008, to request that each licensee evaluate the licensing basis, design, testing, and corrective action programs for the Emergency Core Cooling Systems (ECCS), Residual Heat Removal (RHR) System, and Containment Spray (CS) System to ensure that gas accumulation is maintained less than the amount that could challenge operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

In an October 14, 2008 letter (Serial No. 08-0013B), Dominion provided the information requested in GL 2008-01 for Surry and North Anna Power Stations. However, as identified in our May 7, 2008 letter (Serial No. 08-0013A), Dominion provided an alternate schedule for the completion of the walkdowns and evaluations of the inaccessible portions of the ECCS and Spray Systems inside containment. Specifically, Dominion committed to provide this information by January 15, 2009 for North Anna Unit 2 and July 15, 2009 for North Anna Unit 1. The NRC approved the completion schedule via letter dated July 23, 2008.

In summary, Dominion has concluded that: 1) the ECCS, RHR and containment spray systems at North Anna Power Station Unit 2 are in compliance with their TS definitions of operability, i.e., capable of performing their intended safety functions, and 2) North Anna Power Station is in compliance with 10 CFR 50, Appendix B, Criterion III, V, XI, XVI, and XVII, with respect to the concerns outlined in GL 2008-01 regarding gas accumulation in the applicable systems.

The attachment to this letter provides the results of the walkdown and evaluations of the inaccessible portion of the ECCS inside containment for North Anna Power Station Unit 2.

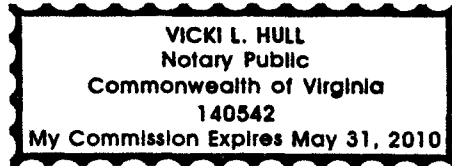
Please contact Mr. Thomas Shaub at (804) 273-2763 if you have any questions or require additional information.

Sincerely,



William R. Matthews  
Senior Vice President – Nuclear Operations


COMMONWEALTH OF VIRGINIA     )  
  )  
COUNTY OF HENRICO            )



The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by William R. Matthews, who is Senior Vice President – Nuclear Operations of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 15<sup>TH</sup> day of January, 2009.

My Commission Expires: May 31, 2010

  
Notary Public

Commitments made in this letter: None

Attachment:  
Supplemental Response to GL 2008-01 - North Anna Power Station Unit 2

cc: U. S. Nuclear Regulatory Commission  
Region II  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, S.W., Suite 23T85  
Atlanta, GA 30303-8931

NRC Senior Resident Inspector  
North Anna Power Station

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

Mr. J. F. Stang, Jr.  
NRC Project Manager  
U. S. Nuclear Regulatory Commission  
One White Flint North  
Mail Stop O8-G9A  
11555 Rockville Pike  
Rockville, MD 20852-2738

Ms. D. N. Wright  
NRC Project Manager  
U. S. Nuclear Regulatory Commission  
One White Flint North  
Mail Stop O8-H4A  
11555 Rockville Pike  
Rockville, MD 20852-2738

**ATTACHMENT**

**NORTH ANNA POWER STATION UNIT 2**  
**SUPPLEMENTAL RESPONSE TO GL 2008-01**

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**(DOMINION)**

**North Anna Unit 2**  
**Nine-Month Supplemental Response to NRC Generic Letter 2008-01**

This attachment provides the nine-month Supplemental Response to Generic Letter 2008-01 for actions that were deferred until the next refueling outage for North Anna Unit 2 as requested by Dominion in a May 8, 2008 letter (Serial No. 08-0013A) and approved by the NRC in a July 23, 2008 letter.

The original conclusions documented in North Anna Units 1 and 2 nine-month response with respect to the licensing basis evaluation, testing evaluations, and corrective action evaluations have not changed for North Anna Unit 2. This supplement provides the results of design evaluation reviews conducted during the recent Unit 2 refueling outage associated with walkdowns of previously uncompleted activities.

**A. EVALUATION RESULTS**

**1. Design Basis Documents**

No changes to licensing or design basis have been identified as a result of the confirmatory inspection or walkdowns performed during the North Anna Unit 2 refueling outage.

**2. Confirmatory Walkdowns**

- a. The Low Head Safety Injection cold leg piping inside containment was laser scanned and detailed isometrics prepared. A slope report was developed to identify high points in the piping. Each identified high point of greater than 1 degree was evaluated for potential gas accumulation. The evaluated high points did not exceed previously determined acceptance criteria developed for this discharge piping.
- b. Venting was performed at the system piping high points outside of containment in accordance with existing station procedures for each ECCS system piping train upon return to service. Subsequent full flow testing and system flow sweeping was performed in accordance with existing station procedures to perform dynamic venting of the system piping high points both outside and inside of containment for each ECCS system piping train.

**3. Vent Valves**

No new vent valve locations or modifications to existing vent valves have been identified by the confirmatory inspection or walkdown.

#### **4. Procedures**

No procedure revisions have been identified by the confirmatory inspection or walkdown.

### **B. DESCRIPTION OF NECESSARY ADDITIONAL CORRECTIVE ACTIONS**

#### **1. Additional Corrective Actions**

No additional corrective actions are required as a result of the confirmatory inspection or walkdown.

#### **2. Corrective Action Updates**

No changes have been made to the previous corrective actions identified in Section C of Attachment 2 to Dominion's October 14, 2008 letter (Serial No. 08-0013B).

### **Conclusion**

Dominion has evaluated the previously unevaluated portions of the applicable systems at North Anna Unit 2 that perform the functions described in the Generic Letter 2008-01 and has concluded that these systems are operable. The original conclusions documented in Dominion's response dated October 14, 2008 with respect to the licensing basis evaluation, testing evaluations, and corrective action evaluations have not changed.