10 CFR 50.55a

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 12, 2009

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 08-595D
NL&OS/ETS R0
Docket No. 50-338
License No. NPF-4

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
NORTH ANNA POWER STATION UNIT 1
RESPONSE TO NRC COMMENTS ON THE FOURTH INTERVAL ISI PROGRAM

In letters dated October 17, 2008 (Serial No. 08-0595) and February 18, 2009 (Serial No. 09-595B), Dominion submitted the North Anna Power Station Unit 1 Inservice Inspection (ISI) Program for the fourth ISI interval applicable to Class 1, 2, and 3 components, component supports, and a revision to Relief Request CS-001. Included with the program were requests for alternatives or relief from specific code requirements in accordance with 10 CFR 50.55a (a)(3)(i) and/or (ii) or 10 CFR 50.55a(g)(5)(iii). In an April 30, 2009 phone call with Dominion, the NRC staff commented on the ISI program submittal. In response to those NRC staff comments, revised ISI program pages are included in the attachment to this letter. Please replace the original pages with the attached pages.

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

Sincerely,

Leslie Hartz
Vice President – Nuclear Support Services

Attachments:

1. Response Comments on the Fourth Interval ISI Program and CS-001
2. Revised Pages

Commitments made in this letter: None

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ATTACHMENT 1

FOURTH INTERVAL ISI PLAN
RESPONSE TO COMMENTS ON THE FOURTH INTERVAL ISI PROGRAM

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT 1

FOURTH INTERVAL ISI PLAN
RESPONSE TO REQUEST FOR INFORMATION FOR FOURTH INTERVAL ISI PROGRAM AND RELIEF REQUEST CS-001

NRC Comments

The NRC staff has the following comments related to North Anna Unit 1 ISI Fourth 10-year Interval Program submittal and Relief Request CS-001, Revision 1:

1. The original ISI fourth 10-year interval program submittal dated October 7, 2008, Abstract, Page ii, Third paragraph states that IWP (inservice testing of pumps) and IWV (Inservice Testing of Valves) Program are separate programs and are not included as part of ISI Program. Please note that the Articles IWP and IWV are not part of the applicable ASME Section XI, 2004 Edition.

2. The original ISI fourth 10-year program submittal dated October 7, 2008, Abstract, Page viii, Table states that Relief Request CS-001- Surveillance of snubbers will be in accordance with TRM and preservice testing in accordance with ISTD. Please note that ISTD is not part of ASME Section XI, nor the Relief Request CS-001, Revision 1 dated February 18, 2009. ISTD needs to be deleted from the ISI program.

3. Revised Relief Request CS-001, Revision 1, Page, 2 of 8, Visual Examination, third paragraph, fourth line states that historically, the number of unacceptable visual snubber inspections at NAPS Unit 1 is one or less and based on the snubber population, the current inspection interval is 48 months (every other refueling outage). Please note that 48 months are not a guarantee, it depends upon future visual examination.

Dominion Response

NRC Comments 1 and 2

Revised ISI Program pages are attached to address the specific NRC comments.

NRC Comment 3

The phrase "the current inspection interval is 48 months (every other refueling outage)" was included to identify the current inspection interval for Unit 1. Dominion agrees that if additional failures are identified during future inspections the inspection frequency will change accordingly. A revised page is attached with the phrase removed to avoid confusion.

ATTACHMENT 2

FOURTH INTERVAL ISI PLAN
RESPONSE TO COMMENTS ON THE FOURTH INTERVAL ISI PROGRAM

CORRECTED PAGES

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT 1

ABSTRACT

VIRGINIA ELECTRIC AND POWER COMPANY
(DOMINION)
NORTH ANNA POWER STATION UNIT 1

INSERVICE INSPECTION PLAN

FOURTH INSPECTION INTERVAL

MAY 1, 2009 THROUGH APRIL 30, 2019

As required by the Code of Federal Regulations, Title 10, Part 50, Section 50.55a (10 CFR 50.55a), the NAPS 1 Inservice Inspection (ISI) Program should have been updated to the 2001 Edition of ASME Section XI with addenda through the 2003 Addenda.. This was the latest edition and addenda of Section XI incorporated into 10 CFR 50.55a as of April 30, 2008. However, as allowed by 10 CFR 50.55a(g)(4)(iv), the fourth inservice inspection plan was prepared to the requirements of the 2004 Edition of ASME Section XI. This updated program is for the NAPS 1 fourth ten year inspection interval scheduled to commence May 1, 2009 and be completed April 30, 2019. These dates reflect extension of the first interval by 201 days documented in our letter to the NRC dated 8/25/88, Serial No. 88-486, and extension of the second interval by 127 days approved per NRC Letter No. 98-167, dated 3/6/98. In cases where the requirements of Section XI have been determined to be impractical, requests for relief have been developed per 10 CFR 50.55a(g)(5). Alternatives, as allowed by 10 CFR 50.55a(a)(3), to specific requirements of ASME Section XI or 10 CFR 50.55a, that provide an acceptable level of quality and safety and provide a methodology more conducive to the performance of an examinations have been proposed. Similarly, alternatives have been proposed when compliance with specified requirements would result in hardship or unusual difficulty without a compensation increase in the level of quality and safety.

This document provides an overview and summary of the NAPS-1 ISI Program for Subsections IWA, IWB, IWC, IWD and IWF. The boundaries of the ISI Program, component classifications, and the employment of exemptions in IWB-1220, IWC-1220, IWD-1220, and IWF-1230 are shown on the ISI Classification Boundary Drawings (CBMs). The graphic codes, symbols and text used on the CBMs are detailed on 11715-CBM-L&S-4, Legends and Symbols Drawing.

The Inservice Inspection Schedule for Components and Component Supports and the Inservice Inspection Plan for System Pressure Tests are provided in separate volumes to the ISI Program. System Pressure Tests are performed in accordance with the System Pressure Test Implementing Schedule. The IWE (Requirements for Class MC and CC Components) and IWL (Requirements for Class CC Concrete Components) Programs are separate and are not included as part of the ISI Program. Steam generator inspections will continue to be performed under Plant Technical Specifications

Component Support Relief Requests				
CS-001 - Surveillance of snubbers will be in accordance with Technical Requirements Manual and preservice testing in accordance with ASME OM Part 4.	Pending			
Miscellaneous Documents				
(Reserved for Later Use.)				
Partial Coverage Relief Requests				
(Reserved for Later Use.)				
Risk Informed Application				
(Reserved for Later Use.)				

There are 326 small bore snubbers and 12 large bore snubbers (greater than 50 KIPS) installed in North Anna Unit 1. All the snubbers at NAPS Unit 1 are hydraulic snubbers.

Snubber maintenance and repair are controlled at NAPS by written maintenance procedures that are based on manufacturers' recommendations and industry good practices. These procedural requirements are similar to the requirements of OM Part 4, paragraph 1.5.6. Changing snubber maintenance procedures requires review and approval of the snubber engineer. Design engineering approval is required for any changes that could affect the snubbers ability to meet the functional (operability) test acceptance criteria or affect the snubbers ability to support the design load. Following maintenance and repair, snubbers are required to be functionally tested to demonstrate that they meet the acceptance criteria. Snubbers that are modified or replaced due to visual or functional testing deficiencies are subject to the requirements of IWA-4000 and must be evaluated for suitability as required by OM Part 4, paragraph 1.5.7. Replacement snubbers are functionally tested prior to installation and visually inspected following installation in accordance with the snubber visual inspection criteria.

VISUAL INSPECTIONS

For visual inspections, the TRM states that snubbers are categorized as accessible or inaccessible during reactor operation and may be examined independently. This is the same requirement as OM Part 4, paragraph 1.6.

The TRM does not address snubber preservice examinations. However, snubbers are rotated from service in accordance with Code Case N-508-3 (approved by Reg. Guide 1.147) and following replacement a visual examination is required to be performed in accordance with maintenance procedures and the post maintenance testing program. This visual examination is similar to the preservice examination requirements described in OM Part 4, paragraph 2.1.1. Additional preservice operability testing proposed by Virginia Electric and Power Company (Dominion) is described later in this section. Repair/Replacements activities will be performed as required by Code Case N-508-3 and IWA-4000. Replacement snubbers are functionally tested prior to installation to demonstrate that they meet engineering acceptance criteria.

The intervals for snubber visual inspections are conducted in accordance with the TRM visual examination table which meets Generic Letter 90-09. The inspection interval is based on the snubber population and the number of unacceptable snubbers. Historically, the number of unacceptable visual snubbers inspections at NAPS Unit 1 is one or less. The OM Part 4, paragraph 2.3.2.2 bases the inspection frequency on the number of unacceptable snubbers but does not take into consideration the snubber