VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

August 24, 2009

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555 Serial No. 09-253A NL&OS/ETS R0 Docket Nos. 50-338 50-339 License Nos. NPF-4 NPF-7

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION) NORTH ANNA POWER STATION UNITS 1 AND 2 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REACTOR COOLANT PRESSURE BOUNDARY VISUAL INSPECTIONS PROPOSED ALTERNATIVE - N1-I3-NDE-024 AND N2-I3-NDE-025

In a letter dated May 12, 2009 (Serial No. 09-253), Dominion requested approval of an alternative the inspection requirements of footnote included to 1 in 10 CFR50.55a(g)(6)(ii)(E), Reactor Coolant Pressure Boundary Visual Inspections, for North Anna Units 1 and 2. The requested alternative will permit the inspections performed during the Unit 1 fall 2007 and Unit 2 fall 2008 refueling outages on the bottom mounted instrument tubes (BMI) to be used as the initial reactor coolant pressure boundary visual inspection in place of the footnote requirement for the initial inspection to be performed at the next refueling outage after January 1, 2009. The NRC requested additional information in an August 3, 2009 e-mail. The response to the requested information is included in the attachment to this letter.

If you should have any questions regarding this submittal, please contact Mr. Thomas Shaub at (804) 273-2763.

Sincerely,

W Hay

Leslie N. Hartz Vice President – Nuclear Support Services

Attachment: Response to Request for Additional Information

Commitments made in this letter: None

Serial No. 09-253A Docket Nos. 50-338/339 Alternative for BMI Baseline Inspections Page 2 of 2

cc: U.S. Nuclear Regulatory Commission Region II Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Suite 23T85 Atlanta, Georgia 30303

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

NRC Senior Resident Inspector North Anna Power Station

Dr. V. Sreenivas NRC Project Manager U. S. Nuclear Regulatory Commission One White Flint North Mail Stop 8G9A 11555 Rockville Pike Rockville, Maryland 20852

Ms. K. R. Cotton NRC Project Manager U. S. Nuclear Regulatory Commission One White Flint North Mail Stop 16E15 11555 Rockville Pike Rockville, Maryland 20852

ATTACHMENT

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

REACTOR COOLANT PRESSURE BOUNDARY VISUAL INSPECTIONS PROPOSED ALTERNATIVE N1-I3-NDE-024 and N2-I3-NDE-025

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION) NORTH ANNA POWER STATION UNITS 1 AND 2

REQUEST FOR ADDITIONAL INFORMATION <u>THIRD 10-YEAR INSERVICE INSPECTION INTERVAL</u> <u>REQUESTS FOR RELIEF NOS. N1-I3-NDE-024 AND N2-I3-NDE-025</u> <u>VIRGINIA ELECTRIC AND POWER COMPANY</u> <u>NORTH ANNA POWER STATION, UNITS 1 AND 2</u> <u>DOCKET NUMBERS 50-338 AND 50-339</u>

Background

The American Society of Mechanical Engineers (ASME) Code of record for the North Anna Power Station (NAPS), Unit 1 third 10-year interval inservice inspection program is the 1989 Edition no Addenda of American Society of Mechanical Engineers (ASME) Code, Section XI and for NAPS, Unit 2 it is the 1995 Edition of the ASME Code, Section XI through the 1996 Addenda.

By letter dated May 12, 2009, Virginia Electric and Power Company (Dominion) submitted its third 10-year interval inservice inspection (ISI) program plan Requests for Relief Nos. N1-I3-NDE-024 and N2-I3-NDE-025 for NAPS, Units 1 and 2, respectively. Dominion's submittal proposed to use inspections that were performed on the reactor bottom-mounted instrument (BMI) penetrations during the fall of 2007 and fall 2008 for NAPS, Units 1 and 2, respectively, in place of the initial inspections required by Title 10 of the Code of Federal Regulations (10 CFR) 50.55a(g)(6)(ii)(E). 10 CFR 50.55a(g)(6)(ii)(E) requires licensees, to implement ASME Code case N-722 "Additional Examinations for PWR Pressure Retaining Welds in Class 1 Components Fabricated with Alloy 600/82/182 Material."

The staff reviewed the information Dominion provided that supports the proposed Relief Request Nos. N1-I3-NDE-024 and N2-I3-NDE-025 and required a response regarding the following issues:

NRC Question 1

What were the results of the licensee's inspections that were performed on the reactor bottom-mounted instrument nozzle penetrations during the fall of 2007 and fall of 2008 for NAPS, Units 1 and 2, respectively? Were there any indications of leakage found, e.g., signs of corrosion, boric acid residue?

Dominion Response

The BMI penetrations have been inspected twice on each unit, most recently during the fall of 2007 and fall of 2008 for North Anna Units 1 and 2, respectively. There have been no indications of leakage, no signs of corrosion and no boric acid residue found on either unit.

NRC Question 2

On page 3 of 4 in the first paragraph of the licensee's submittal dated May 12, 2009, it was noted that Enclosure 1 was the "Examiner Qualification and Resolutions Requirements". It appears to the staff that Enclosure 1 was a summary of the "Examiner Qualification and Resolutions Requirements" not the actual document. Provide a clarification or the actual document.

Dominion Response

At the time the examinations were performed, Code Case N-722 had not been issued. ASME Code Case N-722 includes specific requirements for the visual examination (VE) and the qualification of personnel performing the VEs of the BMIs. Enclosure 1 to the Relief Request was intended to be a summary of how Dominion met these requirements for the visual examination of the BMIs.

NRC Question 3

Is the sample size and selection of components for the inspections performed in the fall of 2007 and 2008 for NAPS, Units 1 and 2, respectively, equivalent to Table 1 of ASME Code Case N-722?

Dominion Response

Yes, all BMI penetrations were inspected during the fall 2007 and fall 2008 refueling outages for North Anna Units 1 and 2, respectively. This approach is consistent with the requirements of Code Case N-722, which requires all penetrations be examined.