

**PROPRIETARY INFORMATION-WITHHOLD UNDER 10 CFR 2.390**

**VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261**

**September 7, 2010**

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Serial No. 10-478  
NL&OS/GDM: R1  
Docket Nos. 50-280/281  
50-338/339  
License Nos. DPR-32/37  
NPF-4/7

**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)  
EVALUATION OF ALUMINUM CONDUIT SEAL PENETRATION FIRE TESTS  
NORTH ANNA AND SURRY POWER STATIONS UNITS 1 AND 2**

During the 2009 NRC Triennial Fire Protection Inspection at Surry Power Station (SPS), NRC Inspection Reports 05000280/2009007 and 05000281/2009007 dated August 5, 2009, the NRC opened unresolved item (URI) 2009007-01 regarding the qualification of aluminum conduits with silicone foam seals in use at Surry that penetrate fire rated barriers (i.e. floor and wall assemblies). The URI concern was the lack of sufficient qualification documentation to support the use of aluminum conduit penetration configurations in the plant. The aluminum conduit penetrations at North Anna Power Station (NAPS) were also reviewed, and it was concluded that this concern was applicable to the NAPS penetrations as well. The NRC documented this issue for NAPS in Inspection Reports 05000338/2009008 and 05000339/2009008 as URI 2009008-01.

To resolve the documentation concern regarding qualification testing of aluminum conduits with silicone foam penetration seals in fire rated barriers, Dominion contracted with Transco Products, Inc. to perform testing at the Intertek Laboratories in Elmendorf, Texas. The test reports are included in the enclosed Dominion Engineering Transmittal, ET-CEP-10-0006, Revision 0, "Evaluation of Aluminum Conduit Seal Penetration Fire Tests," dated May 13, 2010, for Surry and North Anna Power Stations Units 1 and 2. The ET is provided for the NRC's information in support of the resolution of URI 2009007-01 for SPS and URI 2009008-01 for NAPS. Additional testing of two-inch aluminum conduit seal penetrations was conducted subsequent to the issue of the attached reports during the week of August 23, 2010. The results of this testing will be available following issuance of the associated test report.

Dominion considers a significant portion of the enclosed ET to be proprietary in nature including testing protocols, configurations, results and conclusions. To conform with the requirements of 10 CFR 2.390 concerning the protection of proprietary information, the proprietary information included in the ET in Enclosure 1 is contained within brackets. Where the proprietary information has been deleted in the non-proprietary version, only


**ENCLOSURE 1 CONTAINS PROPRIETARY INFORMATION THAT IS BEING WITHHELD FROM  
PUBLIC DISCLOSURE UNDER 10 CFR 2.390. UPON SEPARATION OF ENCLOSURE 1, THIS PAGE  
IS DECONTROLLED.**

*A006  
IE01  
NRR*

the brackets remain (i.e., the information that was contained within the brackets in the proprietary version has been redacted). Enclosure 2 has been redacted to provide a non-proprietary version of ET-CEP-10-0006, Revision 0. The basis for redacting certain information as proprietary is provided in the application for withholding and affidavit provided in Enclosure 3 pursuant to 10 CFR 2.390(b)(1).

If you have further questions or require additional information, please contact Mr. Gary D. Miller at (804) 273-2771.

Sincerely,



J. Alan Price  
Vice President – Nuclear Engineering

Enclosures:

1. Engineering Transmittal, ET-CEP-10-0006, Revision 0, "Evaluation of Aluminum Conduit Seal Penetration Fire Tests," dated May 13, 2010, North Anna and Surry Power Stations Units 1 and 2 (Proprietary Version)
2. Engineering Transmittal, ET-CEP-10-0006, Revision 0, "Evaluation of Aluminum Conduit Seal Penetration Fire Tests," dated May 13, 2010, North Anna and Surry Power Stations Units 1 and 2 (Redacted Version)
3. Application for Withholding from Public Disclosure and Affidavit of J. Alan Price

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission - Region II  
Marquis One Tower, NE  
245 Peachtree Center Avenue  
Suite 1200  
Atlanta, Georgia 30303-1257

NRC Senior Resident Inspector  
North Anna Power Station

NRC Senior Resident Inspector  
Surry Power Station

Ms. K. R. Cotton  
NRC Project Manager  
U. S. Nuclear Regulatory Commission  
One White Flint North  
Mail Stop 8 G9A  
11555 Rockville Pike  
Rockville, MD 20852-2738

Dr. V. Sreenivas  
NRC Project Manager  
U. S. Nuclear Regulatory Commission  
One White Flint North  
Mail Stop 8 G9A  
11555 Rockville Pike  
Rockville, MD 20852-2738