

Eugene S. Grecheck
Vice President
Nuclear Development

Dominion Energy, Inc. • Dominion Generation
Innsbrook Technical Center
5000 Dominion Boulevard, Glen Allen, VA 23060
Phone: 804-273-2442, Fax: 804-273-3903
E-mail: Eugene.Grecheck@dom.com



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

Serial No. NA3-11-007R
Docket No. 52-017
COL/DWL

DOMINION VIRGINIA POWER
NORTH ANNA UNIT 3 COMBINED LICENSE APPLICATION
SRP 17.05: RESPONSE TO RAI LETTER 57

On February 9, 2011, the NRC requested additional information to support the review of certain portions of the North Anna Unit 3 Combined License Application (COLA). The response to the following RAI Question is provided in Enclosure 1:

- RAI 5230, Question 17.05-10 Independent review function details

The information from this response will be incorporated into a future submission of the COLA, as described in the enclosure.

Please contact Regina Borsh at (804) 273-2247 (regina.borsh@dom.com) if you have questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Eugene S. Grecheck".

Eugene S. Grecheck

DOB
NRD

Enclosure:

1. Response to RAI Letter Number 57, RAI 5230 Question 17.05-10

Commitments made by this letter:

1. Incorporate proposed changes in a future COLA submission.

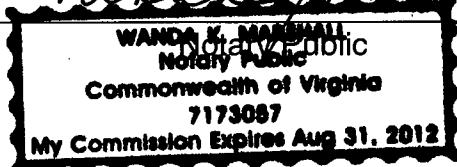
COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President-Nuclear Development of Virginia Electric and Power Company (Dominion Virginia Power). He has affirmed before me that he is duly authorized to execute and file the foregoing document on behalf of the Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 1st day of March, 2011
My registration number is 7173057 and my
Commission expires: August 31, 2012

Wanda K. Marshall



cc: U. S. Nuclear Regulatory Commission, Region II
C. P. Patel, NRC
T. S. Dozier, NRC
J. T. Reece, NRC

ENCLOSURE 1

Response to NRC RAI Letter No. 57

RAI 5230 Question 17.5-10

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5230 (RAI Letter No. 57)

**SRP SECTION: 17.5 – QUALITY ASSURANCE PROGRAM DESCRIPTION –
DESIGN CERTIFICATION, EARLY SITE PERMIT AND NEW
LICENSE APPLICANTS**

**QUESTIONS for Quality and Vendor Branch 1 (AP1000/EPR Projects)
(CQVP)**

DATE OF RAI ISSUE: 02/09/2011

QUESTION NO.: 17.5-10

Appendix 17AA to North Anna Unit 3 FSAR Chapter 17, "North Anna Power Station Unit 3 Quality Assurance Program Description" is based on NEI 06-14, Rev. 9 (NEI 06-14A Revision 7). Part V, "Additional Quality Assurance and Administrative Controls for the Operational Phase," Section 2, "Review of Activities Affecting Safe Plant Operation," of Appendix 17AA, describes the independent review function. However:

1. "Reviews of internal audit reports," as a task performed by the organization that executes the independent review functions, is missing from the North Anna Power Station Unit 3 Quality Assurance Program Description. Please explain the basis for not performing the above task.

2. In NEI 06-14, Rev 9 (NEI 06-14A Rev 7), the independent review function performs, in part, "Reviews proposed tests and experiments not described in the SAR prior to implementation. Verifies the determination of whether changes to proposed tests and experiments not described in the SAR require a technical specification change or license amendment." Whereas the North Anna Power Station Unit 3 Quality Assurance Program Description states "Reviews proposed tests and experiments not described in the SAR. Changes to proposed tests and experiments not described in the SAR that do require a technical specification change must be reviewed by the IRC prior to NRC submittal and

implementation.” Please provide justification for the deviation from the exact language used in NEI 06-14, Rev 9 (NEI 06-14A Rev 7).

Dominion Response

The two discrepancies noted in the question are the result of an administrative error that occurred during the COLA revision process. It is Dominion's intent that the North Anna 3 QAPD be consistent with NEI 06-14 Rev. 9 (NEI 06-14A Rev 7) with regard to the independent review function. Therefore, the North Anna 3 QAPD will be revised to include the internal audit report review requirement as an independent review organization task. Similarly, the description of the independent review function regarding tests and experiments will be revised to be consistent with the wording in the NEI template.

Proposed COLA Revision

FSAR Appendix 17AA will be revised as indicated on the attached markup.

Markup of North Anna COLA

The attached markup represents Dominion's good faith effort to show how the COLA will be revised in a future COLA submittal in response to the subject RAI. However, the same COLA content may be impacted by revisions to the DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be somewhat different than as presented herein.

- Reviews proposed tests and experiments not described in the SAR prior to implementation. ~~Changes to proposed tests and experiments not described in the SAR that do require a technical specification change must be reviewed by the IRC prior to NRC submittal and implementation.~~ Verifies the determination of whether changes to proposed tests and experiments not described in the SAR require a technical specification change or license amendment.
- Reviews proposed technical specification changes and license amendments relating to nuclear safety prior to NRC submittal and implementation, except in those cases where the change is identical to a previously approved change.
- Reviews violations, deviations, and events that are required to be reported to the NRC. This review includes the results of investigations and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.
- Reviews any matter related to nuclear safety that is requested by the CNO, the Vice President North Anna 3, or any IRC member.
- Reviews corrective actions for significant conditions adverse to quality.
- Reviews internal audit reports.
- Reviews the adequacy of the audit program every 24 months.