

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 26, 2011

10 CFR 26.9
10 CFR 26.205

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

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NL&OS/GDM R1
Docket Nos.: 50-338/339
50-280/281
License Nos.: NPF-4/7
DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA AND SURRY POWER STATIONS UNITS 1 AND 2
REQUESTS FOR EXEMPTION FROM CERTAIN REQUIREMENTS OF THE FITNESS
FOR DUTY RULE FOR MANAGING FATIGUE
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

By letter dated February 10, 2011, Dominion Nuclear Connecticut, Inc., (DNC) and Virginia Electric and Power Company (Dominion) submitted requests for exemption from the requirements of 10 CFR 26.205(c) and (d) for meeting work hour controls during declarations of severe weather conditions involving tropical storm or hurricane force winds for Millstone Power Station Units 1, 2 and 3 and North Anna and Surry Power Stations Units 1 and 2, respectively. By emails dated May 2, 2011, the NRC Project Manager for North Anna Power Station provided requests for additional information for North Anna and Surry associated with assigned work shifts for personnel sequestered during declarations of severe weather conditions involving tropical storm or hurricane force winds. Dominion's response to the NRC questions is provided in the attachment.

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

Sincerely,



L. N. Hartz
Vice President – Nuclear Support Services

Commitment made in this correspondence

1. Guidance will be incorporated into the HRP-N that: 1) emphasizes the need for pre-planned and consistent work-shift start times to better facilitate fatigue management, and 2) states that the Station Hurricane Response Organization staff will be provided an opportunity for at least 10 hours of restorative rest when off-shift and should not be assigned any duties when off-shift.

Attachment

Response to NRC Request for Additional Information

cc: U.S. Nuclear Regulatory Commission - Region II
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Attachment

Response to NRC Request for Additional Information

**Virginia Electric and Power Company
(Dominion)
North Anna and Surry Power Stations Units 1 and 2**

Response to NRC Request for Additional Information
North Anna and Surry Power Stations Units 1 and 2

By letter dated February 10, 2011, Virginia Electric and Power Company (Dominion) requested an exemption from certain requirements of the Fitness for Duty Rule for Managing Fatigue for North Anna and Surry Power Stations Units 1 and 2. Specifically, the letter requested an exemption from the requirements of 10 CFR 26.205 (c) and (d) for meeting work hour controls during declarations of severe weather conditions involving tropical storm or hurricane-force winds.

The NRC staff subsequently determined that additional information was necessary to complete their review. The requested information and Dominion's responses are provided below:

1. *Many factors contribute to fatigue. One of these factors is inconsistent start times. In order to manage fatigue during the sequester, will shift start times be pre-planned and consistent? Explain the rationale for organizing current shift start times during the sequester.*

Dominion Response

Dominion's expectation is that shift start times during declarations of severe weather conditions involving tropical storm or hurricane force winds will be pre-planned and consistent. The Dominion Hurricane Response Plan (Nuclear) [HRP-N] currently includes a 24-hour shift assignment schedule template that includes entries for two 12-hour shifts for the Station Hurricane Response Organization staff positions. Determination of the initial 12-hour shift schedule and notification of the response staff of their assigned positions and work shifts would be completed prior to the arrival of severe weather onsite as part of the pre-storm activities outlined in the HRP-N. In addition, the HRP-N is being revised to emphasize the need for pre-planned and consistent work-shift start times to better facilitate fatigue management.

2. *Time at work is one of the major contributors to fatigue; another is lack of restorative rest. What are the expected typical shift durations for the various job duty groups that will be sequestered? Will any individuals be required to work shifts longer than 12 hours?*

Dominion Response

It is expected that the Station Hurricane Response Organization staff will work a 12-hour shift followed by a 12-hour break for restorative rest between successive work periods. Regardless, the Station Hurricane Response Organization staff will be provided an opportunity for at least 10 hours of restorative rest when off-shift and should not be assigned any duties when off-shift. This guidance will be incorporated

into the HRP-N. Support staff personnel and contractors who are not assigned to a 12-hour shift would work their regularly scheduled shifts unless directed otherwise by their departmental manager, but in any case would not be expected to work longer than a 12-hour shift. Once station management has had an opportunity to evaluate the impact of the severe weather on station operations, transition to a work schedule other than 12-hour shifts, i.e., less than 12-hours per shift, would be considered if practical.