

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

August 23, 2013

10 CFR 2.202
EA-12-051

Attention: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Serial No.: 12-167C
NL&OS/MAE: R4
Docket Nos.: 50-280/281
License Nos.: DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
SIX-MONTH STATUS REPORT IN RESPONSE TO MARCH 12, 2012 COMMISSION
ORDER MODIFYING LICENSES WITH REGARD TO RELIABLE SPENT FUEL POOL
INSTRUMENTATION (ORDER NUMBER EA-12-051)

References:

1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012
3. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation", Revision 1, dated August 2012
4. Virginia Electric and Power Company's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated October 25, 2012 (Serial No. 12-167A)
5. Virginia Electric and Power Company's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2013 (Serial No. 12-167B)
6. Virginia Electric and Power Company's March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), Request for Additional Information (RAI) Response, dated August 8, 2013 (Serial No. 13-416)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Virginia Electric and Power Company (Dominion). Reference 1 was immediately effective and directs Dominion to install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2.

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NRC Senior Resident Inspector
Surry Power Station

Attachment

**Six Month Status Report for the Implementation of Order EA-12-051,
Order Modifying Licenses with Regard to Requirements for
Reliable Spent Fuel Pool Instrumentation**

**Surry Power Station Units 1 and 2
Virginia Electric and Power Company (Dominion)**

Six Month Status Report for the Implementation of Order EA-12-051

1 Introduction

Dominion developed an Overall Integrated Plan (OIP) (Reference 1) documenting the requirements to install reliable spent fuel pool level instrumentation (SFP LI) in response to Order EA-12-051 (the Order) (Reference 2). This attachment provides an update of milestone accomplishments since submittal of the OIP including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestones have been completed since the development of the OIP and are current as of July 31, 2013.

- Submit OIP
- Commence Engineering and Design

3 Milestone Schedule Status

The following table provides an update to the milestone schedule supporting the OIP. This table provides the activity status of each item and the expected completion date noting any change. The target completion dates are subject to change as design and implementation details are developed.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit OIP	Feb 2013	Complete	
Commence Engineering and Design	March 2013	Complete	
Complete Engineering and Design	September 2013	Started	December 2013
Complete Procurement of SFP Instruments	December 2013	Started	May 2014
Commence Installation of SFP Instruments	June 2014	Not Started	
Level Measurement System Functional	September 2014	Not Started	

The revised milestone target completion dates do not impact the Order implementation date for Surry Power Station.

4 Changes to Compliance Method

By letter dated February 28, 2013, Dominion provided an OIP to address reliable SFP LI at Surry Power Station Units 1 and 2 as required by the Order (Reference 1). On July 11, 2013, Ms. Karen Cotton Gross, the NRC Project Manager for Surry Power Station, provided a Request for Additional Information (RAI) in an email to Mr. David Heacock, President and Chief Nuclear Officer of Dominion, regarding the Surry SFP LI system OIP. By letter dated August 8, 2013, Dominion submitted its response to the RAI (Reference 3).

The following are changes to the information provided in the Surry OIP and supplemented by the Surry RAI response. These changes do not alter Dominion's compliance method with NEI 12-02.

- a) As an update to the response to RAI 1a, the formal calculation performed to verify that adequate water level is available to support net positive suction head (NPSH) has been completed and independently reviewed. Results of the calculation confirm the Level 1 value of 42.2 feet specified in the RAI response is HIGHER than the minimum NPSH value of 40.4 feet (Reference 4). This information is being provided herein versus the February 2014 six month status update.
- b) Completion of procurement of the SFP instruments has been rescheduled to May 2014.

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Dominion expects to comply with the Order implementation date, and no required relief/relaxation has been identified at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

No update is required since there were no open items identified in the OIP submittal and the Draft Safety Evaluation has not been issued.

7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the Draft Safety Evaluation identified at this time.

8 References

The following references support the updates to the OIP described in this attachment.

1. "Dominion's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," Serial No. 12-167B, dated February 28, 2013.

2. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012.
3. "March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), Response to Request for Additional Information (RAI)," Serial No. 13-416, dated August 8, 2013.
4. Calculation CALC-MISC-11798, Rev. 0, Add 0, "Dominion Fleet Spent Fuel Pool Levels to Provide Adequate NPSH to the Cooling Pumps with a Saturated Pool."