

Attachment: Response to Request for Additional Information in Support of NRC Review
of COLR Cycle 25 Pattern KTY Revision 1 for Cycle 25

Commitments made in this letter: None.

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ATTACHMENT

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
IN SUPPORT OF NRC REVIEW OF
COLR CYCLE 25 PATTERN KTY REVISION 1 FOR CYCLE 25**

**Virginia Electric and Power Company
(Dominion)
North Anna Power Station Unit 2**

Response to Request for Additional Information
in Support of NRC Review of COLR Cycle 25 Pattern KTY Revision 1 for Cycle 25
North Anna Power Station Unit 2

Generic Letter 88-16 provides guidance to modify Technical Specifications (TS) that have cycle-specific parameter limits using NRC approved methodology. The modifications, in part, were to allow these cycle-specific TS parameters to be relocated to licensee controlled Core Operating Limits Report (COLR) and to include a list of the TS parameters relocated to the COLR and their associated methodologies used to establish these TS parameters in the TS. The licensee has adopted Generic Letter 88-16 for use at North Anna Unit 2. Section 5.6.5 of the licensee's TS contains a list of many analytical methods used to develop COLR parameters while the COLR only lists a subset of these analytical methods.

RAI No. 1

Please identify those specific analytical methods listed in the TS that were used in the development of COLR parameters for Cycle 25. If there are analytical methods that were not specifically used for Cycle 25, please provide a justification for maintaining them in the TS.

Dominion Response

The two previous operating cycles, North Anna Unit 1 Cycles 23 and 24 and North Anna Unit 2 Cycles 23 and 24, had a mixed core configuration with both AREVA Advanced Mark-BW fuel and Westinghouse RFA-2 fuel. During these cycles, the Core Operating Limits Report (COLR) included both AREVA and Westinghouse analytical methods to determine core operating limits for each vendor's fuel product.

The current operating cycles, North Anna Unit 1 Cycle 25 (N1C25) and North Anna Unit 2 Cycle 25 (N2C25), are full cores of Westinghouse RFA-2 fuel. As such, the AREVA analytical methods are not in the cycle-specific COLR for either N1C25 or N2C25 since these core designs do not contain AREVA Advanced Mark-BW fuel. The specific analytical methods listed in the TS that were used in the development of COLR parameters for Unit 2 Cycle 25 (N2C25) are provided in the list of references of the N2C25 COLR Pattern KTY, Revision 1 submitted on April 21, 2016.

Although not used in the N2C25 COLR, Dominion maintains the AREVA methodologies in the TS list of COLR references as a contingency measure to support the loading of AREVA Advanced Mark-BW fuel into North Anna cores in the future, if required. Currently, the AREVA Advanced-Mark BW fuel assemblies are still on Dominion's fuel re-use list to support core design pattern development during a redesign. In order to support potential emergent redesigns during an outage, it is necessary for Dominion to maintain the ability to reinsert these AREVA Advanced-Mark BW fuel assemblies back

into the core, if required. Once a sufficient number of Westinghouse RFA-2 fuel assemblies are stockpiled in the spent fuel pool, a license amendment request will be submitted to remove the AREVA methods from TS 5.6.5.b. Specifically, AREVA analytical methods in References 10 through 15 will be removed from TS 5.6.5.b list of COLR references.