

From: [Hall, Randy](#)
To: [Craig D Sly \(Generation - 6\)](#)
Cc: [Diane Aitken \(Generation - 6\) \(diane.aitken@dominionenergy.com\)](#)
Subject: Acceptance for Review - Proposed Alternative for the RPV Bottom Head VT Exam - North Anna Units 1 and 2 (EPID L-2018-LLR-0115)
Date: Friday, September 14, 2018 11:23:00 AM

September 14, 2018

Mr. Craig Sly
Manager, Nuclear Regulatory Affairs
Virginia Electric and Power Company

Dear Mr. Sly,

By letter dated August 17, 2018 (Agencywide Documents Access and Management System Accession No. ML18235A317), Virginia Electric and Power Company (Dominion Energy Virginia, or, the licensee) submitted proposed inservice inspection (ISI) alternatives N1-I5-SPT-001 and N2-I5-SPT-001, in accordance with 10 CFR 50.55a(z)(2), for North Anna Power Station, Units 1 and 2, respectively. The submittal proposed alternatives to the requirements of the applicable edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, governing visual examination of the bottom of the reactor vessel. The requested alternatives would consist of visual examinations (VT-2) to be conducted with the containment at atmospheric pressure during refueling outages, in lieu of the sub-atmospheric conditions associated with the performance of a system leakage test, as specified in IWB-5220. The proposed alternatives, if approved, would apply for the fifth ISI intervals for North Anna Unit 1 (May 1, 2019 through April 30, 2029) and North Anna Unit 2 (December 14, 2020 through December 13, 2030).

The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of the request for alternative pursuant to 10 CFR 50.55a(z). The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed alternatives in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 200 hours to complete. The NRC staff expects to complete this review in approximately 10 months, by July 31, 2019, which is ahead of your

requested approval date of September 1, 2019. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at (301) 415-4032.

Sincerely,

Randy Hall, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
USNRC
(301) 415-4032
Randy.Hall@nrc.gov