



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 13, 2020

Mr. Daniel G. Stoddard
Senior Vice President and
Chief Nuclear Officer
Innsbrook Technical Center
5000 Dominion Blvd
Glen Allen, VA 23060-6711

SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2 – DETERMINATION OF ACCEPTABILITY AND SUFFICIENCY FOR DOCKETING, PROPOSED REVIEW SCHEDULE, AND OPPORTUNITY FOR A HEARING REGARDING THE VIRGINIA ELECTRIC AND POWER COMPANY'S APPLICATION FOR SUBSEQUENT LICENSE RENEWAL (EPID NOS. L-2020-SLR-0000 AND L-2020-SLE-0000)

Dear Mr. Stoddard:

By letter dated August 24, 2020 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML20246G703), Virginia Electric and Power Company (Dominion) submitted an application for the subsequent license renewal of Renewed Facility Operating License Nos. NPF-4 and NPF-7 for the North Anna Power Station, Units 1 and 2 (North Anna) to the U.S. Nuclear Regulatory Commission (NRC).

By letter dated September 17, 2020 (ADAMS Accession No. ML20224A105) and Federal Register Notice (FRN) dated September 21, 2020 (85 FR 59334), the NRC noted the receipt and availability of this application.

The NRC staff's acceptance review is intended to identify whether the application is reasonably complete and conforms to the timing and information requirements in applicable regulations. The NRC staff reviewed your application following the guidance in NUREG-2192, Revision 0, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants," and NUREG-1555, Supplement 1, Revision 1, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants," to determine if the application provides sufficient information and is acceptable for docketing in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Sections 2.101, 51.45, 51.53(c), 54.19, 54.21, 54.22, and 54.23.

The NRC staff made the following observations while performing its acceptance review of your application:

- On page 4-137, the application provides the following reference: PWROG-19047-P, Revision 1 (Proprietary), "North Anna Reactor Vessel Low Upper-Shelf Fracture Toughness Equivalent Margin Analysis," May 2020. On page A-36, the application states that PWROG-19047-P was submitted to the NRC for review and approval. However, the NRC is currently reviewing PWROG-19047-P, Revision 0, not Revision 1.

The NRC staff requests Dominion to either correct this error in a supplement to the application or submit Revision 1 to PWROG-19047-P for the NRC staff's review.

- The application makes several references to buried gray cast iron piping in the "Fire Protection System." However, there are no aging management review items in Table 3.3.2-42, "Fire Protection," of the application for this component, material, and environment combination. The application states that sections of buried gray cast iron piping were replaced with ductile iron in 2013, but there is no mention of a full-scale replacement. Additionally, the Selective Leaching aging management program discusses a failure due to cyclic fatigue, which is an aging effect not referenced in NUREG-2191, "Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report," for this component, material, and environment combination. The staff notes that the issue of cyclic fatigue of buried gray cast iron fire protection system piping will be subject to the NRC staff's detailed review and that it may require additional review time and requests for additional information (RAIs).

As stated in the email sent to Paul Aitken on September 30, 2020 (ADAMS Accession No. ML20281A622), the NRC staff has concluded that the application will be accepted for the staff's detailed review. Given the lesser scope and depth of the acceptance review as compared to a detailed technical review, the staff's determination does not preclude RAIs or topic-specific audits. During the staff's detailed technical review, there may be instances identified in which issues that impact the NRC staff's ability to complete the detailed technical review are identified. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

This letter also forwards the staff's projected review schedule for the North Anna subsequent license renewal application (Enclosure). The NRC staff will follow established review procedures and the enclosed schedule to complete the reviews required by 10 CFR Parts 51 and 54. Based on the information provided in your submittal and discussions during the pre-application meetings, the NRC staff has estimated that review of this subsequent license renewal application will take approximately 23,000 hours to complete. If there are emergent complexities or challenges in the NRC staff's 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 via separate correspondence. Milestones for hearing activities that may be needed are not included in the enclosed schedule or the estimated hours because these dates would be established by the Commission or an Atomic Safety and Licensing Board, and hearing-related resource considerations, if any, would need to be developed in the future.

The staff's review schedule also relies on the assumption that your responses to the staff's RAIs, if needed, will be of high quality and provided in a timely manner. A timely response is defined as 30 days from the date of the request, or within such other time as may be specified in the request in accordance with 10 CFR 2.108. You should also be prepared to provide high quality support in a timely and organized manner during any technical audits that are determined to be necessary by the staff. We request that you inform the NRC staff in writing as early as possible should potential delays arise in your support of the review schedule.

The staff notes that the application covers the subsequent license renewal period for which either new plant-specific analyses have been provided or topical reports have been referenced that have not yet been reviewed by the NRC staff. The staff may require the expenditure of additional effort, including potential additional audits, to complete plant-specific analyses or

topical reports referenced in the application. The NRC staff's goal is to complete the review in 18 months provided that the applicant fully addresses the staff's information needs in a timely manner.

Finally, we have sent a further notice related to your application to the Office of the Federal Register for publication (ADAMS Accession No. ML20265A307). This notice announces the acceptance of your application for review and an opportunity to request a hearing and to file a petition for leave to intervene.

If you have any questions on this matter, please contact Mr. David Drucker, Senior Project Manager, for the safety review of the North Anna subsequent license renewal application, by telephone at 301-415-6223 or via e-mail at David.Drucker@nrc.gov, or Mr. Tam Tran, Project Manager, for the environmental review of the application by telephone at 301-415-3617 or via e-mail at Tam.Tran@nrc.gov.

Sincerely,

Anna H. Bradford, Director
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

Docket Nos: 50-338 and 50-339

Enclosure:
Review Schedule

cc: Listserv

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PCooper, RII/DRS

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ADAMS Accession Nos.:

ML20267A340 (Package)

ML20258A284 (Letter)

ML20265A307 (FRN)

***via E-mail**

OFFICE	PM:NLRP:DNRL*	LA:NLRP:DNRL*	PM:ERLRB:REFS*	OGC (NLO)*
NAME	DDrucker	YEdmonds	TTran	STurk
DATE	9/23/2020	9/24/2020	9/29/2020	9/30/2020
OFFICE	BC:NLRP:DNRL*	BC:ERLRB:REFS*	PM:NLRP:DNRL*	D:DNRL*
NAME	LGibson	RElliott	DDrucker	ABradford
DATE	10/7/2020	9/29/2020	10/5/2020	10/9/2020

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**NORTH ANNA POWER STATION, UNITS 1 AND 2
SUBSEQUENT LICENSE RENEWAL APPLICATION REVIEW SCHEDULE**

Milestone	Scheduled	Actual
Receive Subsequent License Renewal Application (SLRA)	08/2020	08/24/2020
Publish <i>Federal Register</i> Notice (FRN) – LRA Availability	09/2020	09/21/2020
Publish FRN – Docketing Acceptance/Rejection and Opportunity for Hearing	10/2020	
Publish FRN – Notice of Intent to Prepare an Environmental Impact Statement and Conduct Scoping	10/2020	
Public Meeting – Overview of Subsequent License Renewal Process and Environmental Scoping	11/2020	
Environmental Scoping Period Ends	12/2020	
Deadline for Filing Hearing Requests and Petitions for Intervention	12/2020	
Issue Draft Supplemental Environmental Impact Statement (DSEIS)	08/2021	
Public Meeting – Draft SEIS Meeting, If Needed	9/2021	
End of DSEIS Comment Period	10/2021	
Advisory Committee on Reactor Safeguards (ACRS) Subcommittee Meeting	12/2021	
Issue Safety Evaluation Report (SER)	1/2022	
Issue Final SEIS	2/2022	
ACRS Full Committee Meeting	2/2022	
U.S. Environmental Protection Agency FRN Published – Availability of Final SEIS	3/2022	
Decision – Director, NRR	4/2022	