

**From:** Miller, Ed  
**Sent:** Tuesday, November 23, 2021 2:52 PM  
**To:** Erica.N.Combs@dominionenergy.com  
**Subject:** Draft RAI for TSTF-577 LAR  
**Attachments:** NAPS TSTF-577 LAR Draft RAI.docx

Erica,

Attached is the NRC staff's draft RAI for the subject request. The questions are being transmitted to you to determine 1) If the question clearly conveys the NRC information needs, 2) Whether the regulatory basis for the question is clear, and 3) If the information has already been provided in existing docketed correspondence. Additionally, review of the draft question will allow you to determine whether you are able to support a 30 day response time. After you've had a chance to review, please let me know if you would like to have a clarification call. Thank you.

Ed Miller  
(301) 415-2481

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 1429

**Mail Envelope Properties** (SA1PR09MB7487704B36CF7F7F26AB1213E9609)

**Subject:** Draft RAI for TSTF-577 LAR  
**Sent Date:** 11/23/2021 2:51:44 PM  
**Received Date:** 11/23/2021 2:51:00 PM  
**From:** Miller, Ed

**Created By:** Ed.Miller@nrc.gov

**Recipients:**  
"Erica.N.Combs@dominionenergy.com" <Erica.N.Combs@dominionenergy.com>  
Tracking Status: None

**Post Office:** SA1PR09MB7487.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	630	11/23/2021 2:51:00 PM
NAPS TSTF-577 LAR Draft RAI.docx		44432

**Options**  
**Priority:** Normal  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**

## DRAFT

### DRAFT REQUEST FOR ADDITIONAL INFORMATION

#### LICENSE AMENDMENT REQUEST

#### VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION ENERGY VIRGINIA)

#### NORTH ANNA POWER STATION UNITS 1 AND 2

#### DOCKET NOS. 50-338 AND 50-339

By letter dated September 9, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21252A514), Virginia Electric and Power Company (the licensee) submitted a license amendment request (LAR) for Nuclear Regulatory Commission (NRC) approval for an amendment to the facility operating license for the North Anna Power Station, Units 1 and 2. The licensee requested that the NRC process the proposed amendment under the Consolidated Line Item Improvement Process (CLIIP). The proposed changes would revise the "Steam Generator (SG) Program" and the "Steam Generator Tube Inspection Report" technical specifications (TSs) based on Technical Specifications Task Force (TSTF) Traveler TSTF-577, Revision 1, "Revised Frequencies for Steam Generator Tube Inspections" (TSTF-577) (ADAMS Accession No. ML21060B434), and the associated NRC staff safety evaluation (SE) TSTF-577 (ADAMS Accession No. ML21098A188).

The tubes within an SG function as an integral part of the reactor coolant pressure boundary and, in addition, isolate fission products in the primary coolant from the secondary coolant and the environment. SG tube integrity means that the tubes are capable of performing this safety function in accordance with the plant design and licensing basis.

North Anna Power Station has two Units. Both Unit 1 and Unit 2 SGs have Alloy 690 thermally treated (Alloy 690TT) tubes.

The NRC staff has determined that additional information is needed to complete its review, as described below.

#### Regulatory Basis

The regulation in Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.36(c)(5), "Administrative Controls," states in part, that "[a]dministrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." All pressurized water reactors have TSs according to 10 CFR 50.36 that include a SG Program with specific criteria for the structural and leakage integrity, repair, and inspection of SG tubes. At North Anna Power Station Units 1 and 2, programs established by the licensee, including the SG Program, are listed in the administrative controls section of the TS to operate the facility in a safe manner.

#### Background

As noted above, on September 9, 2021, the licensee submitted the application described above. Based on the submittal, the NRC identified issues that are not consistent with traveler TSTF-577 adoption.

Draft Request for Additional Information

To complete its evaluation of whether the proposed TS changes meet the SG Program requirements described above and are consistent with the adoption of TSTF-577, the NRC staff notes the following discrepancies associated with TS 5.6.7, "Steam Generator Tube Inspection Report," as compared to the model changes

1. item a. ends with a semicolon versus a comma
2. item d. is missing "the" preceding "forward-looking"

For all corrections, provide new Attachments for the affected TS pages for the NRC staff to review. For those items that are not corrected to be consistent with traveler TSTF-577, please address as a variation (i.e., changes that were not part of the approved traveler).