

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 16, 2021

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

Serial No.: 21-410
NRA/ENC: R0
Docket Nos.: 50-338
50-339
License Nos.: NPF-4
NPF-7

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION ENERGY VIRGINIA)
NORTH ANNA POWER STATION UNITS 1 AND 2
APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-577,
"REVISED FREQUENCIES FOR STEAM GENERATOR TUBE INSPECTIONS," REV 1,
USING THE CONSOLIDATED LINE-ITEM IMPROVEMENT PROCESS
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

By letter dated September 9, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21252A514), Virginia Electric and Power Company (Dominion Energy Virginia) submitted a request for Nuclear Regulatory Commission (NRC) approval of an amendment to the facility operating license for North Anna Power Station, Units 1 and 2. The proposed changes would revise Technical Specification (TS) 5.6.7, "Steam Generator (SG) Program," and TS 5.5.8, "Steam Generator Tube Inspection Report," based on Technical Specifications Task Force (TSTF) Traveler TSTF-577, Revision 1, "Revised Frequencies for Steam Generator Tube Inspections" (ADAMS Accession No. ML21060B434), and the associated NRC staff safety evaluation (ADAMS Accession No. ML21098A188). Dominion Energy Virginia requested that the NRC process the license amendment request (LAR) under the Consolidated Line-Item Improvement Process (CLIIP).

By email dated November 23, 2021, NRC staff identified discrepancies in the TS 5.6.7 pages provided with the LAR that are not consistent with TSTF-577 adoption. The NRC staff requested that the discrepancies be corrected, or a justification provided for any variations from the approved traveler. The NRC staff requested a response by January 3, 2022.

The Enclosure describes the discrepancies identified by the NRC staff as well as an additional self-identified error in TS 5.6.7. A marked-up version of TS 5.6.7 is provided in Attachment 1. This page replaces the same page submitted in the LAR. A clean copy of the corrected TS page is provided in Attachment 2. This page replaces the same page submitted in the LAR.

In accordance with 10 CFR 50.91, a copy of this correspondence, with attachments, is being provided to the designated Virginia Official.

Should you have any questions or require additional information, please contact Erica N. Combs at 804-273-3386.

Sincerely,



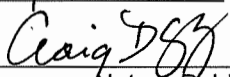
Mark D. Sartain
Vice President – Nuclear Engineering & Fleet Support

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

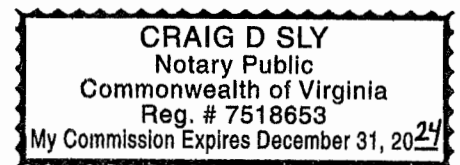
The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mr. Mark D. Sartain, who is Vice President – Nuclear Engineering and Fleet Support, of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 16th day of December, 2021.

My Commission Expires: 12/31/24.



Notary Public



Enclosure: Response to Request for Additional Information

Attachments:

1. Proposed Technical Specification Changes (Mark-up)
2. Revised Technical Specification Page

Commitments made by this letter: None

cc: Regional Administrator, Region II
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Richmond, Virginia 23219

ENCLOSURE

Response to Request for Additional Information

**Virginia Electric and Power Company
(Dominion Energy Virginia)
North Anna Power Station Unit 1 and Unit 2**

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION
REGARDING APPLICATION TO REVISE TECHNICAL SPECIFICATIONS
TO ADOPT TSTF-577, REV. 1, USING THE
CONSOLIDATED LINE-ITEM IMPROVEMENT PROCESS

By letter dated September 9, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21252A514), Virginia Electric and Power Company (Dominion Energy Virginia) submitted a request for Nuclear Regulatory Commission (NRC) approval of an amendment to the facility operating license for North Anna Power Station, Units 1 and 2. The proposed changes would revise Technical Specification (TS) 5.6.7, "Steam Generator (SG) Program," and TS 5.5.8, "Steam Generator Tube Inspection Report," based on Technical Specifications Task Force (TSTF) Traveler TSTF-577, Revision 1, "Revised Frequencies for Steam Generator Tube Inspections" (ADAMS Accession No. ML21060B434), and the associated NRC staff safety evaluation (ADAMS Accession No. ML21098A188). Dominion Energy Virginia requested that the NRC process the license amendment request (LAR) under the Consolidated Line-Item Improvement Process (CLIIP).

By email dated November 23, 2021, NRC staff identified discrepancies in the TS 5.6.7 pages provided with the LAR that are not consistent with TSTF-577 adoption. The NRC staff requested that the discrepancies be corrected, or a justification provided for any variations from the approved traveler. The NRC staff requested a response by January 3, 2022.

Dominion Energy Virginia's response to the NRC request for additional information (RAI) is provided below.

NRC RAI:

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; and*
- 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).

Dominion Energy Virginia's Response:

The discrepancies noted by the NRC staff have been corrected. An additional discrepancy identified during Dominion Energy Virginia's review of the material was also corrected:

1. item e. "steam generator," was changed to "SG;"

A marked-up version of TS 5.6.7 is provided in Attachment 1. This page replaces the same page submitted in Attachment 1 of the LAR. A clean copy of the corrected TS page is provided in Attachment 2. This page replaces the same page submitted in Attachment 2 of the LAR.

ATTACHMENT 1

Proposed Technical Specification Changes (Mark-up)

**Virginia Electric and Power Company
(Dominion Energy Virginia)
North Anna Power Station Unit 1 and Unit 2**

5.6 Reporting Requirements

5.6.7 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.8, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG,
- b. Degradation mechanisms found,
- c. Nondestructive examination techniques utilized for each degradation mechanism,
- d. Location, orientation (if linear), and measured sizes (if available) of service induced indications,
- e. Number of tubes plugged during the inspection outage for each degradation mechanism,
- f. The number and percentage of tubes plugged to date, and the effective plugging percentage in each steam generator, and
- g. The results of condition monitoring, including the results of tube pulls and in-situ testing.

ATTACHMENT 2

Revised Technical Specification Page

**Virginia Electric and Power Company
(Dominion Energy Virginia)
North Anna Power Station Unit 1 and Unit 2**

5.6 Reporting Requirements

5.6.7 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.8, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
 - b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;
 - c. For each degradation mechanism found:
 1. The nondestructive examination techniques utilized;
 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and
 4. The number of tubes plugged during the inspection outage.
 - d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results;
 - e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SG; and
 - f. The results of any SG secondary side inspections.
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