

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

May 12, 2003

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Serial No. 03-050A  
NLOS/ETS  
Docket No. 50-339  
License No. NPF-7

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**NORTH ANNA POWER STATION UNIT 2**  
**REQUEST FOR ADDITIONAL INFORMATION**  
**ASME SECTION XI INSERVICE INSPECTION PROGRAM RELIEF REQUEST CMP-020**  
**EXAMINATION OF REACTOR PRESSURE VESSEL HEAD-TO-FLANGE WELD**

In a January 28, 2003 letter (Serial No. 03-050), Virginia Electric and Power Company (Dominion) submitted a request for relief from certain requirements of ASME Section XI. Specifically, the preservice examinations for the North Anna Unit 2 replacement head were conducted to the requirements of the 1995 Edition through 1996 Addenda of ASME Section XI. However, interferences due to lifting lugs and the weld configuration prohibited complete examination of the reactor pressure vessel head-to-flange weld. During an April 21, 2003 telephone conference call, the NRC staff requested additional information regarding the examination interferences and the inservice inspection interval dates for Unit 2 to complete the review of the proposed relief request. The requested information is provided below and in Attachment 1 of this letter.

North Anna Unit 2 is currently in the third Inservice Inspection Interval that started December 14, 2001 and is scheduled to end December 13, 2010.

The reactor vessel head (RVH) fabrication drawings provided in Attachment 1 are North Anna Unit 1 drawings. These drawings are typical of the RVHs fabricated by Framatome for North Anna Units 1 and 2 and the Surry Unit 1 replacement heads and provide the details of the examination interferences.

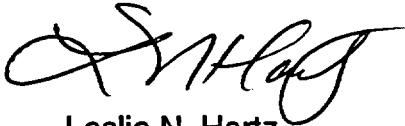
Framatome ANP considers information on the RVH drawings as proprietary. To conform to the requirements of 10 CFR 2.790 concerning the protection of proprietary information, the proprietary information in Attachment 1 is contained within brackets. A non-proprietary redacted version of Attachment 1 is also provided in Attachment 2. Where the proprietary information has been deleted in the non-proprietary version, only the brackets remain. Framatome ANP's basis for classifying the information proprietary pursuant to 10 CFR 2.790(b)(1) is included in the affidavit included in Attachment 3. Accordingly, it is requested that the information that is proprietary to Framatome ANP in Attachment 1 be

A047

withheld from public disclosure in accordance with 10 CFR 2.790 of the Commission's regulations.

If you have any additional questions concerning this request, please contact Mr. Thomas Shaub at (804) 273-2763.

Very truly yours,



Leslie N. Hartz  
Vice President – Nuclear Engineering

Attachments

1. Response to Request for Additional Information with Proprietary Information
2. Redacted Response to Request for Additional Information
3. Framatome ANP Affidavit

Commitments made in this letter: None

cc: U. S. Nuclear Regulatory Commission (Atts 2 & 3 only)  
Region II  
Sam Nunn Atlanta Federal Center  
61 Forsyth St., SW, Suite 23T85  
Atlanta, Georgia 30303

Mr. M. J. Morgan (Atts 2 & 3 only)  
NRC Senior Resident Inspector  
North Anna Power Station

Mr. S. R. Monarque  
Licensing Project Manager  
Division of Licensing Project Management  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. M. M. Grace (Atts 2 & 3 only)  
Authorized Nuclear Inspector  
North Anna Power Station

Mr. J. E. Reasor, Jr. (Atts 2 & 3 only)  
Old Dominion Electric Cooperative  
Innsbrook Corporate Center  
4201 Dominion Blvd.  
Suite 300  
Glen Allen, Virginia 23060

**Attachment 1**

**PROPRIETARY**

**RVH Drawings**

**CMP-020 Examination Of Reactor Pressure Vessel  
Head-To-Flange Weld**

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

**THIS PAGE IS AN OVERSIZED DRAWING  
OR FIGURE,  
THAT CAN BE VIEWED AT THE RECORD  
TITLED:**

**DRAWING NO.: BUEPNA/NCC2112,  
"CUVE DE REACTEUR 900 MW<sub>e</sub>  
REACTOR VESSEL 900 MW<sub>e</sub>  
SOUDURES, REVETEMENTS ET  
BEURRAGES DU  
COUVERCLE DE LA CÙVE  
WELDS, CLADDINGS AND BUTTERING OF  
REACTOR VESSEL CLOSURE HEAD  
PLAN DE REPERAGE  
IDENTIFICATION DRAWING"**

**WITHIN THIS PACKAGE... OR  
BY SEARCHING USING THE  
DOCUMENT/REPORT NO.  
BUEPNA/NCC2112**

**NOTE: Because of these page's large file size, it may be more convenient to copy the file to a local drive and use the Imaging (Wang) viewer, which can be accessed from the Programs/Accessories menu.**

**PROPRIETARY**

**D-01**

**THIS PAGE IS AN OVERSIZED  
DRAWING OR FIGURE,  
THAT CAN BE VIEWED AT THE  
RECORD TITLED:  
DRAWING NO.: BUEPNA/NCC2101,  
"CUVE DE REACTEUR 900 MW<sub>e</sub>  
REACTOR VESSEL 900 MW<sub>e</sub>  
COUVERCLE DE CUVE  
CLOSURE HEAD OF THE VESSEL  
PLAN D'ENSEMBLE  
ASSEMBLY DRAWING"**

**WITHIN THIS PACKAGE... OR  
BY SEARCHING USING THE  
DOCUMENT/REPORT NO.  
BUEPNA/NCC2101**

**NOTE:** Because of these page's large file size, it may be more convenient to copy the file to a local drive and use the Imaging (Wang) viewer, which can be accessed from the Programs/Accessories menu.

**D-02**

**PROPRIETARY**

**Attachment 2**

**Non-Proprietary**

**RVH Drawings**

**CMP-020 Examination Of Reactor Pressure Vessel  
Head-To-Flange Weld**

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

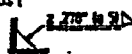
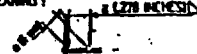


Non-Proprietary

EXAMPLE OF WELD DIMENSIONS		ON DRAWINGS:		MEASURING:	
		GENERAL NOTE: THE DIMENSIONS ARE THE TRANSLATION IN U.S. CUSTOMARY UNITS (FEET AND INCHES). THE VALUES BETWEEN BRACKETS ARE IN METRIC UNITS (MM).			
NEXT STEP DRAWING N° ETAPE SUIVANTE PLAN N°					
Revisions: VO 6205					
B	ASB	31/01/83	P.00000001	00000001	
Revisions: VO 6332 - COMMENTS FROM INC TAKEN INTO ACCOUNT					
	ASB	07/04/83	P.00000001	00000001	
REV.	DATE	BY	DTM	DTM	DTM
			Revised by	Revised by	Revised by
NORTH ANNA 1 (CC/CP32)					
FRAMATOME ANP			Valid for US application		
CUVE DE REACTEUR 900 MWe REACTOR VESSEL 900 MWe SOUDEURES, REVETEMENTS ET BEURRAGES DU COUVERCLE DE LA CUVE WELDS, CLADDINGS AND BUTTERING OF REACTOR VESSEL CLOSURE HEAD PLAN DE REPERAGE IDENTIFICATION DRAWING					
EPP			BUEPNA/NCC212		

FRAMATOME ANP, INC.

02-1286672D-01

Non-Proprietary

NEXT STEP DRAWING N°: ETAPE SUIVANTE PLAN N°:									
EXAMPLE OF VELD DIMENSIONS			ON DRAWINGS: 			MEASURING: 			
			GENERAL NOTE: THE DIMENSIONS ARE THE TRANSLATION IN U.S. CUSTOMARY UNITS (FEET AND INCHES). THE VALUES BETWEEN BRACKETS ARE IN METRIC UNITS (MM).						
NEXT STEP DRAWING N°: ETAPE SUIVANTE PLAN N°:									
Observations: NO 6201									
B		ASB		01/10/83		P. CHODDET - ROBARDET			
Observations: NO 632 - COMMENTS FRA NC TAKEN INTO ACCOUNT									
A		ASB		01/04/83		P. CHODDET - ROBARDET			
REV.		Date		BY		BY		BY	
		01/04/83		P. CHODDET		P. CHODDET		P. CHODDET	
NORTH ANNA 1 (CONFIGURATION ASB DU COUVERCLE) (AS BUILT LAY-OUT OF CLOSURE HEAD)									
FRAMATOME ANP					Valid for US application				
Scale		1/20		CUVE DE REACTEUR 900 MWe REACTOR VESSEL 900 MWe COUVERCLE DE CUVE CLOSURE HEAD OF THE VESSEL					
Type		E		PLAN D'ENSEMBLE ASSEMBLY DRAWING					
Signature				EFF BUEPNA/NCC2101					
<small>On document all signatures are FRAMATOME ANP. This document is the property of FRAMATOME ANP. This part (the title, description, identification) is designed for use as a reference in the project. Document to be used, reproduced, transmitted or disclosed without the prior written permission of FRAMATOME ANP.</small>									

FRAMATOME ANP, INC.  
02-1286671D-01



**Attachment 3**

**RVH Drawings**

**Framatome ANP Affidavit**

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

# AFFIDAVIT

COMMONWEALTH OF VIRGINIA )  
 ) ss.  
CITY OF LYNCHBURG )

1. My name is James F. Mallay. I am Director, Regulatory Affairs, for Framatome ANP ("FANP"), and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by FANP to determine whether certain FANP information is proprietary. I am familiar with the policies established by FANP to ensure the proper application of these criteria.

3. I am familiar with the information shown in a series of drawings being provided to the NRC by Dominion Generation that support licensing actions related to replacement reactor vessel closure heads for North Anna 1, North Anna 2, and Surry 1. A listing of the pertinent drawings is attached. These drawings are referred to herein as "Documents." Information contained in these Documents has been classified by FANP as proprietary in accordance with the policies established by FANP for the control and protection of proprietary and confidential information.

4. These Documents contain information of a proprietary and confidential nature and is of the type customarily held in confidence by FANP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in the Documents be withheld from public disclosure.

6. The following criteria are customarily applied by FANP to determine whether information should be classified as proprietary:

- (a) The information reveals details of FANP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for FANP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FANP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by FANP, would be helpful to competitors to FANP, and would likely cause substantial harm to the competitive position of FANP.

7. In accordance with FANP's policies governing the protection and control of information, proprietary information contained in these Documents have been made available, on a limited basis, to others outside FANP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

6. FANP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

---

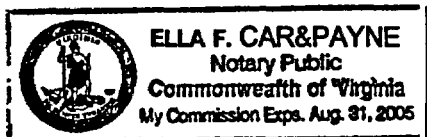
9. The foregoing statements are true and correct to the best of my knowledge,  
information, and belief.

*James F. Miller*

SUBSCRIBED before me this 25<sup>th</sup>  
day of April, 2003.

*Ella F. Carr-Payne*

Ella F. Carr-Payne  
NOTARY PUBLIC, STATE OF VIRGINIA  
MY COMMISSION EXPIRES: 8/31/05



**Framatome ANP Drawings  
Submitted to the NRC by Dominion Generation  
(Attachment to Affidavit Signed April 25, 2003)**

**North Anna 1**

<b>02-I 286671 D-01</b>	<b>BUEPNA/NCC2101 Rev. B</b> Reactor Vessel Closure Head Assembly Drawing
<b>02-I 286672D-0 1</b>	<b>BUEPNA/NCC2112 Rev. B</b> Welds, Clads, Butterings RVCH Identification Drawing
<b>02-I 286674E-00</b>	<b>BUEPNA/NCC2117 Rev. A</b> RVCH Temporary Attachments Welding ID Drawing

**North Anna 2**

<b>02-I 286631 E-02</b>	<b>BUEPNA/NCC2001 Rev. E</b> Reactor Closure Head
<b>02-I 286632E-02</b>	<b>BUEPNA/NCC2012 Rev. C</b> Welds, Clads, Butterings RVCH

**Surry 1**

<b>02-I 286709D-00</b>	<b>BUEPSU/NCC2201 Rev. A</b> RVCH Assembly Drawing
<b>02-128671 OD-00</b>	<b>BUEPSU/NCC2212 Rev. A</b> Welds, Clads, Butterings, RVCH Identification

---