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Dominion

August 11, 2003

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

Serial No.: 03-373
B18945
NL&OS/ETS: R5'
Docket Nos.: 50-338/339
50-280/281
50-336
50-423
License Nos.: NPF-4/7
DPR-32/37
DPR-65
NPF-49

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
DOMINION NUCLEAR CONNECTICUT, INC. (DOMINION)
NORTH ANNA POWER STATION UNITS 1 AND 2
SURRY POWER STATION UNITS 1 AND 2
MILLSTONE POWER STATION UNITS 2 AND 3
GENERIC LETTER 2003-01 CONTROL ROOM HABITABILITY - SCHEDULE FOR CONTROL ROOM TESTING AND TECHNICAL INFORMATION SUBMITTAL

On June 12, 2003, the NRC issued Generic Letter (GL) 2003-01, "Control Room Habitability," to all operating reactors. This generic letter requested information that demonstrates that the control room at each facility complies with the current licensing and design bases as well as applicable regulatory requirements. Furthermore, the generic letter requested information that ensures that suitable design, maintenance and testing control measures are in place for maintaining this compliance.

To provide the information requested in the generic letter, additional testing of the control room envelope will be required at North Anna, Surry, and Millstone Unit 3. As discussed with the NRC staff, in meetings on March 11, 2003 and April 11, 2003 for North Anna and Surry, respectively, we intend to perform an ASTM E-741 tracer gas test of the control room envelope. Similar testing is planned for Millstone Unit 3.

It is our current intention to ensure test consistency by using the same test vendor and same test methodology as discussed in our meetings. However, in order to use the same vendor and test methodology for North Anna, Surry, and Millstone Unit 3, the required testing and data analysis cannot be completed in time to provide the requested information within the 180 days specified in the generic letter.

Dominion has worked with the NEI Control Room Habitability Task force since 1999 and understands the issues associated with GL 2003-01. As a consequence, we have concluded that performance of the typical tracer gas test (SF6) would be difficult and intrusive to plant operations for the Dominion plants due to the design and operation of

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the control rooms and HVAC equipment. Therefore, Dominion plans to perform tracer gas testing using the test method developed by Brookhaven National Laboratory (BNL) Tracer Gas Technology Center. This test uses multiple tracers to ensure that each zone of the control room envelope is tested in accordance with ASTM E-741. These tests are currently scheduled for the Fall of 2003 for North Anna and Surry and early 2004 for Millstone Unit 3.

For Surry Units 1 and 2, it is our intent to perform tracer gas testing to confirm the inleakage assumed in the current design basis calculations. If the tracer gas test results exceed the design basis for Surry Units 1 and 2, compensatory measures will be implemented as appropriate for continued operation.

For North Anna Units 1 and 2 and Millstone Unit 3, the current licensing basis analysis margins available to accommodate the potential range of test results are limited. In both cases, revised licensing submittals are being developed utilizing the NRC's approved Alternate Source Term (AST) methodology. Tracer gas testing to support the North Anna Units 1 and 2 and Millstone Unit 3 responses to the NRC's Generic Letter will be accomplished following submittal of the AST applications. Reasonably conservative values of inleakage are being assumed for the purpose of these AST submittals. Testing will be performed in the non-pressurized mode, which is conservative with respect to the radiological accident mode. Operability of the North Anna Units 1 and 2 and Millstone Unit 3 control room environments will be assessed against the leakage assumption in the AST submittals. Tracer gas test results supporting inleakage rates less than or equal to that assumed in the AST submittal would be assessed as operable conditions, as discussed in our March and April 2003 meetings, and documented in accordance with existing station programs. In the unlikely event that inleakage rates beyond those assumed in the AST analyses are recorded, appropriate compensatory measures will be established to support operability until such time as either repairs are accomplished, additional testing performed, or a revised AST analysis is submitted. Dominion believes this approach is consistent with the Guidance of Generic Letter 91-18, Revision 1, and the implementing guidance provided in the NRC Inspection Manual Part 9900.

To provide a reasonable time for testing, data analysis and final report generation, as well as to accommodate vendor scheduling constraints, we intend to provide the information requested by GL 2003-01 on the following schedule:

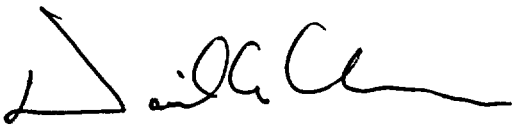
North Anna Units 1 and 2	March 31, 2004
Surry Units 1 and 2	April 30, 2004
Millstone Units 2 and 3	May 31, 2004

To facilitate consistency in the documented response for the site-wide chemical hazards assessment, the Millstone Unit 2 submittal will be provided concurrently with the requested information for Millstone Unit 3. The proposed delay in providing the response for Millstone Unit 2 is commensurate with the safety significance of the requested GL actions, since the Millstone Unit 2 Control Room inleakage surveillance

(Technical Specification 4.7.6.1.e.3/Surveillance Procedure 21205) uses a tracer gas test that currently meets the ASTM E-741 standard.

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

Very truly yours,



David A. Christian
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Commitments made by this letter:

1. Submit GL 2003-01 requested information for North Anna Units 1 and 2 by March 31, 2004.
2. Submit GL 2003-01 requested information for Surry Units 1 and 2 by April 30, 2004.
3. Submit GL 2003-01 requested information for Millstone Units 2 and 3 by May 31, 2004.

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