

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**RICHMOND, VIRGINIA 23261**

**December 7, 2004**

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

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Docket No.	50-339
License No.	NPF-7

**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**  
**NORTH ANNA POWER STATION UNIT 2**  
**ORDER - EA 03-009 SIXTY-DAY REPORT**  
**INSPECTION RESULTS ABOVE THE REACTOR PRESSURE VESSEL HEAD**

On February 20, 2004 the NRC issued the first revised Order (EA-03-009) establishing interim inspection requirements for reactor pressure vessel heads. In accordance with the Order's inspection and reporting requirements, this letter provides the results of the visual inspections performed to identify potential boric acid leaks above the reactor pressure vessel head (RPVH) during the North Anna Unit 2 Spring 2004 refueling outage.

No boric acid leakage was identified from the pressure-retaining components above the RPVH during the inspection performed in Mode 3 at the start of the Spring 2004 refueling outage. However, during removal of a temporary vent hose from the reactor head vent, a small amount of boric acid dripped onto the reactor vessel head. The small amount of boric acid residue was located outside the shroud on the curve above the reactor head studs. Engineering inspected the boric acid residue and it appeared dry and very slight. Based on corrosion rates for such a deposit being negligible (<0.0005 inches per year – from the Electric Power Research Institute's Boric Acid Corrosion Guidebook) and the dose expenditure required for cleanup, the residue was not removed. The boric acid residue was documented in the Corrective Action System and entered into the Boric Acid Corrosion Control program.

The reporting of this small amount of boric acid that spilled onto the head was not performed within the sixty-day requirement of the Order due to an oversight. The spillage described above was assessed by Engineering and not considered operational leakage from pressure-retaining components. However, the technical assessment of the boric acid residue did not account for the programmatic requirement to report the leak or deposit, regardless of the source.

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

Very truly yours,



W. R. Matthews  
Senior Vice President – Nuclear Operations

Commitments made in this letter: None

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