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Docket Nos.: 50-280/281
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50-245/336/423
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72-2/55/16/56/47
License Nos.: DPR-32/37
NPF-4/7
DPR-21/65
NPF-49
DPR-43
SNM-2501/2507

ATTN: Document Control Desk
Director of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

VIRGINIA ELECTRIC AND POWER COMPANY
DOMINION NUCLEAR CONNECTICUT, INC.
DOMINION ENERGY KEWAUNEE, INC.
SURRY POWER STATION UNITS 1 AND 2 AND ISFSIs
NORTH ANNA POWER STATION UNITS 1 AND 2 AND ISFSIs
MILLSTONE POWER STATION UNITS 1, 2 AND 3 AND ISFSI
KEWAUNEE POWER STATION
REQUEST FOR VARIATION IN REPORTING SCHEDULE PURSUANT 10 CFR 74.13(a)

Pursuant to the requirements of 10 CFR 74.13(a), Virginia Electric and Power Company, Dominion Nuclear Connecticut, Inc., and Dominion Energy Kewaunee, Inc. (Dominion) request a permanent variation in the schedule for submitting material status reports. This request applies to North Anna Power Station Units 1 and 2 and both the specific and general license ISFSIs, Surry Power Station Units 1 and 2 and both the specific and general license ISFSIs, Millstone Power Station Units 1, 2 and 3 and the general license ISFSI, and Kewaunee Power Station. The request is made consistent with the "good cause" exception for alternate submission dates in 10 CFR 74.13(a).

Section 10 CFR 74.13(a) specifies that each licensee "...shall complete and submit, in computer-readable format Material Balance Reports concerning special nuclear material that the licensee has received, produced, possessed, transferred, consumed, disposed of, or lost." Furthermore it states, "...licensees subject to this requirement shall submit a report within 60 calendar days of the beginning of the physical inventory required by §§ 74.19(c), 74.31(c)(5), 74.33(c)(4), or 74.43(c)(6)." However, it also notes "The Commission may permit a licensee to submit the reports at other times for good cause."

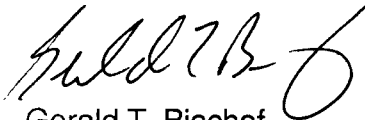
Based on an 18-month operating cycle for each unit and the need for schedule flexibility to operate as a fleet, Dominion requests a change in the ending date for the reporting periods. Since these report periods are tied to the beginning of the physical inventory and it is desirable to schedule these inventories to facilitate safe and efficient operations, taking physical inventories will vary from year to year and plant to plant, but routinely occur prior to a refueling outage. This routine may require the submittal of multiple Material Balance Reports in a relatively short period of time, thereby unnecessarily diverting resources that would normally support refueling and post refueling activities. Therefore, pursuant to 10 CFR 74.13(a), Dominion requests NRC approval to prepare Material Balance Reports, each year, in accordance with the following set schedule and to file the reports within 45 days of these dates:

Kewaunee: October 31
Millstone: December 31
Surry: May 31
North Anna: April 30

Should modification of this schedule be required, Dominion will submit the change for NRC approval prior to implementation.

If you have any questions or require additional information, please contact Mr. Thomas Szymanski at 804.273.3065.

Very truly yours,



Gerald T. Bischof
Vice President – Nuclear Engineering
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Attachments: None

Commitments made by this letter: None

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