

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 2, 2015

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

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VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
SUPPLEMENTAL COMPLIANCE INFORMATION REGARDING THE FINAL
INTEGRATED PLAN IN RESPONSE TO THE MARCH 12, 2012 COMMISSION
ORDER MODIFYING LICENSES WITH REGARD TO REQUIREMENTS FOR
MITIGATING STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS
(ORDER NUMBER EA-12-049)

On March 28, 2012 the Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" [the Order]. On May 19, 2015, Dominion notified the staff that North Anna Power Station was in compliance with the Order and provided the Final Integrated Plan (FIP) for the North Anna FLEX Mitigation Strategies. The purpose of this supplemental information letter is to clarify Dominion's alternative position regarding the storage of a credited piece of BDB equipment outside of the protected BDB Storage Building.

Per the guidance of NEI 12-06, equipment credited in response to 50.54(hh)(2) may also be credited for FLEX mitigating strategies. At North Anna, the 50.54(hh)(2) pump is a backup to the BDB High Capacity pump that is credited for FLEX core and SFP cooling strategies. Only one BDB High Capacity pump is required for the North Anna site, therefore, the BDB High Capacity pump is the (N) pump. The 50.54 (hh)(2) pump meets the functional requirements of the core and SFP cooling strategies and serves to meet the BDB equipment "N+1" requirement. As stated in Sections 2.3.10.1 and 2.7 of the FIP, the 50.54 (hh)(2) pump is stored in Warehouse 10, which is protected from flooding, extreme heat, and extreme cold hazards. Warehouse 10 does not meet the requirements of NEI 12-06, Sections 7.3.1 and 5.3.1 because it is not fully protected against seismic and high wind tornado and hurricane events, respectively.

NEI-12-06, Section 11.3.3. "Equipment Storage" states that:

"FLEX mitigation equipment should be stored in a location or locations informed by evaluations performed per Sections 5 through 9 such that no one external event can reasonably fail the site FLEX capability (N)."

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Storing the (N+1) 50.54 (hh)(2) pump in Warehouse 10 with the BDB High Capacity pump stored in the fully protected BDB Storage Building ensures (N) capability following the occurrence of any of the evaluated hazards described in Sections 5 through 9, if the BDB High Capacity pump is available.

The unavailability criteria stated in NEI 12-06, Section 11.5.3, "Maintenance and Testing," allows FLEX equipment to be unavailable for a period up to 90 days on the basis that (N) capability remains available. In the scenario for which the protected BDB High Capacity pump is unavailable, (N) capability is lost since the 50.54 (hh)(2) pump stored in Warehouse 10, even when available, is vulnerable to seismic and high wind tornado and hurricane events. In this scenario, not only are the requirements of NEI 12-06 Sections 7.3.1 and 5.3.1 not met, but the requirements of 11.3.3 are also not met.

Dominion acknowledges that the storage arrangements for the 50.54(hh)(2) pump represent an alternative to the requirements of NEI 12-06, Sections 5.3.1, 7.3.1, and 11.3.3.

Accordingly, Dominion has implemented compensatory actions to support this alternative approach for stored BDB equipment. The unavailability requirements for FLEX equipment are prescribed by Dominion Fleet procedure ADM-CM-AA-BDB-102 and includes additional requirements to address the storage capability of FLEX equipment that is not fully protected. These additional requirements are as follows:

"The required FLEX equipment may be unavailable for 90 days provided that the site FLEX capability (N) is met. If the site FLEX (N) capability is met but not fully protected for the site's applicable hazards, the allowed unavailability is reduced to 45 days."

Additionally, ADM-CM-AA-BDB-102 provides appropriate guidance for reasonable protection during forecast adverse external conditions as follows:

"If FLEX equipment is likely to be unavailable during forecast site specific external events (e.g., hurricane), then appropriate compensatory measures should be taken to restore equivalent capability in advance of the event."

Abnormal Procedure, 0-AP-41, "Severe Weather Conditions", accommodates this requirement as it invokes an evaluation of the availability of BDB equipment, which includes the 50.54(hh)(2) pumps, upon approaching severe weather.

Both of these actions are intended to limit the potential vulnerability of the 50.54(hh)(2) pump. Therefore, the current on-site FLEX equipment storage configuration in conjunction with the procedural FLEX equipment unavailability requirements ensure reasonable protection for the 50.54(hh)(2) pump as an acceptable alternative to the NEI 12-06 guidance.

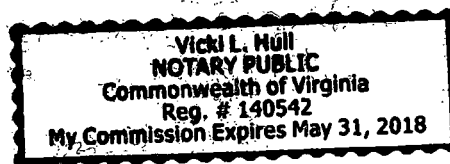
The North Anna Final Integrated Plan has been updated to reflect the alternative to the guidance of NEI 12-06 for storage of the 50.54(hh)(2) pump outside of the protected BDB Storage Building and that appropriate compensatory measures are in place with regard to allowed unavailability of BDB equipment.

Should you have any questions or require additional information, please contact Ms. Diane E. Aitken at (804) 273-2694.

Respectfully,



Mark Sartain
Vice President - Nuclear Engineering



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, 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 2nd day of July, 2015.

My Commission Expires: May 31, 2018


Notary Public

Attachments:
None

Commitments contained in this letter:
None

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