

### **Markup of North Anna COLA**

The attached markup represents Dominion's good faith effort to show how the COLA will be revised in a future COLA submittal in response to the subject RAI. However, the same COLA content may be impacted by responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be somewhat different than as presented herein.

10. A periodic steam dryer inspection program will be implemented as follows:
  - a. During the first two scheduled refueling outages after reaching full power conditions, a visual inspection shall be conducted of all accessible areas and susceptible locations of the steam dryer in accordance with accepted industry guidance on steam dryer inspections. The results of these baseline inspections shall be provided to the NRC within 60 days following startup after each outage.
  - b. At the end of the second refueling outage following full power operation, an updated SDMP reflecting a long-term inspection plan based on plant-specific and industry operating experience shall be provided to the NRC within 180 days following startup from the second refueling outage.

### **3.11 Financial Protection License Conditions**

- 3.11.1 Prior to the scheduled date of initial fuel load, and within ninety (90) days after the NRC publishes the notice of intended operation in the Federal Register, the licensee shall provide evidence to the Director of NRO, or the Director's designee, that it would have the ability to pay into the industry self-insurance program in the event of a nuclear incident and in the amount specified in 10 CFR 140.11(a)(4) for one calendar year using one of the following methods:
  - (a) Surety bond,
  - (b) Letter of credit,
  - (c) Revolving credit/term loan arrangement,
  - (d) Maintenance of escrow deposits of government securities, or
  - (e) Annual certified financial statement showing either that a cash flow (i. e., cash available to a company after all operating expenses, taxes, interest charges, and dividends have been paid) can be generated and would be available for payment of retrospective premiums within three (3) months after submission of the statement, or a cash reserve or a combination of cash flow and cash reserve.

Thereafter, the licensee shall annually provide evidence of such guarantee in accordance with the provisions in 10 CFR 140.21.

- 3.11.2 Upon the date of initial fuel load, Dominion shall provide satisfactory documentary evidence to the Director of NRO, or the Director's designee, that it has obtained the appropriate amount of financial protection required of licensees pursuant to 10 CFR 50.54(w).