

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

October 17, 2001

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

Serial No.:	01- 636
CM/RAB	R0
Docket Nos.:	50-338
	50-339
License Nos.:	NPF-4
	NPF-7

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**PROPOSED IMPROVED TECHNICAL SPECIFICATIONS**  
**REQUEST FOR ADDITIONAL INFORMATION**  
**ITS 3.3.2, ACTION E.1: BLOCK VERSUS BYPASS**  
**BEYOND SCOPE ISSUE (TAC Nos. MB 1426 and MB 1436)**

This letter transmits our response to the NRC's request for additional information (RAI) regarding the North Anna Power Station (NAPS) Units 1 and 2 proposed Improved Technical Specifications (ITS). The North Anna ITS license amendment request was submitted to the NRC in a December 11, 2000 letter (Serial No. 00-606). The NRC requested additional information regarding use of the term "block" in the current Technical Specifications 3.3.2.1 versus use of the term "bypass" in ITS 3.3.2. This information was requested in a NRC letter dated October 3, 2001 (TAC Nos. MB1426 and MB1436).

Attached is the NRC's RAI and our response to the RAI.

If you have any further questions or require additional information, please contact us.

Very truly yours,



Leslie N. Hartz  
Vice President - Nuclear Engineering

Attachment

Commitments made in this letter: None

A001

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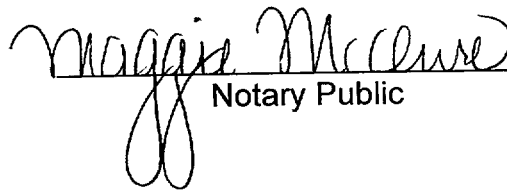
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COMMONWEALTH OF VIRGINIA     )  
   )  
COUNTY OF HENRICO             )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Leslie N. Hartz, who is Vice President - Nuclear Engineering, of Virginia Electric and Power Company. She has affirmed before me that she 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 her knowledge and belief.

Acknowledged before me this 17<sup>th</sup> day of October, 2001.

My Commission Expires: 3-31-04.

  
Notary Public

(SEAL)

## **Attachment**

**Proposed Improved Technical Specifications  
Response to Request for Additional Information  
ITS 3.3.2, Action E.1: Beyond Scope Issue:  
“Block” versus “Bypass”**

**Virginia Electric and Power Company  
(Dominion)**

**North Anna Power Station Units 1 and 2**

**North Anna ITS RAI**  
**ITS 3.3.2 – ESFAS Instrumentation**  
**Beyond Scope Issue (TAC Nos. MB1426 and MB1436)**

**RAI:** On the basis of the NRC's review of the staff-identified beyond-scope issue, ITS Section 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," Table 3.3.2-1, the following information is requested:

**Comment:** CTS LCO 3.3.2.1 requires the use of an ACTION requirement of table 3.3-3 when an EAFAS instrument channel is inoperable. ACTION 16 of Table 3.3-1 requires the inoperable channel to be placed in a blocked condition within 72 hours. ITS LCO 3.3.2, Action E.1 for the Containment pressure channels, requires the inoperable channel to be placed in a bypass condition within 72 hours. VEPCO is requested to provide a description or a schematic diagram that demonstrates that the two types of conditions (bypass and blocked) are identical.

**Response:**

The term "blocked" is used in CTS Table 3.3-1, ACTION 16, for containment pressure channels that energize to trip, and thus require circuit interruption or blocking in order to maintain the channel in the untripped state. Compliance with ACTION 16 results in maintaining a blocked channel in the untripped state.

The Improved Standard Technical Specifications (ISTS) generally do not use the term "block" in Section 3.3. Instead, the ISTS use the term "bypass" to encompass those actions required to maintain a channel in the untripped state, regardless of whether that untripped state would be energized or deenergized. The Bases for ITS 3.3.2, Action E.1, states that the bypass action is intended to "avoid the inadvertent actuation of containment spray." Thus, compliance with Action E.1 results in maintaining a bypassed channel in the untripped state, as does the CTS requirement.

Therefore, the ITS term "bypass," as used in ITS 3.3.2, Action E.1, is identical to the CTS LCO 3.3.2.1, ACTION 16 term "blocked."