

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

August 5, 1977



REGULATORY DOCKET FILE COPY

Mr. Edson G. Case, Acting Director  
Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Serial No. 217B/052077

PO&M/TAP:das

Docket Nos. 50-280  
50-281

License Nos. DPR-32  
DPR-37

Attention: Mr. Robert W. Reid, Chief  
Operating Reactors Branch No. 4

Dear Mr. Case:

This letter is a result of our continuing efforts in minimizing the probability of release during a postulated fuel handling accident in containment.

We have found that by modifying the purge valve relay closing circuit, so that it fails in the safe direction on loss of power, we can eliminate our worst single failure case (Case 3). Therefore, even with a single failure, we do not require the filters to be operable to maintain the postulated release within the limits of 10 CFR100. We are pursuing this design change and request that you delete from our previous letter the Case 3 analysis and the subsequent proposed (for study) Technical Specification change (T.S.3.11.B.10.b) on the frequency of filter surveillance.

During discussions with your staff, it was requested that we state the method of seismically qualifying our radiation monitors. The facts are as follows:

- 1) Initially, the requirement that the monitors must now be seismically qualified was stated.
- 2) We contacted our Architect Engineer and the radiation monitor Vendor and found that since the qualification for the monitors had not been required, it was not issued. However, it was stated that identical radiation monitor design had been seismically qualified, but that the mounting would have to be analyzed.
- 3) Initial analysis showed that the mounting was qualified but further study would be required to assure that the interconnecting tubing, etc. was also qualified.
- 4) Both the AE and the vendor are pursuing the final analysis.

When the results are firm, if any changes are required, they will be made.

We will continue to keep you updated on our progress.

Very truly yours,



C. M. Stallings  
Vice President-Power Supply  
and Production Operations

*for*

cc: Mr. James P. O'Reilly