

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 31, 1979

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. O. D. Parr, Chief
Light Water Reactors Branch No. 3
Division of Project Management
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Serial No. 142D
LQA/ESG:esh
Docket No. 50-338
License No. NPF-4

Dear Mr. Denton:

AMENDMENT TO OPERATING LICENSE
EXEMPTIONS FROM TECHNICAL SPECIFICATIONS
NORTH ANNA POWER STATION UNIT NO. 1

Our letter of March 13, 1979 requested an amendment to Operating License NPF-4 in the form of exemptions to certain requirements of the Technical Specifications and 10CFR50, Appendix J. A more recent letter, dated July 23, 1979, provided an update on testing already completed, and identified those few remaining items for which a deferral is still required.

As a result of telephone conversations with members of the Staff on July 26 and 27, 1979, we have agreed to perform additional time response testing during the upcoming refueling outage, if a deferral of the Technical Specification surveillance requirements is granted. Specifically, Technical Specifications 4.3.1.1.3 and 4.3.2.1.3 require time response testing of one train and 1/N channels, where N is the total number of redundant channels in a specific reactor trip function. If the requested deferral is granted, we will test both trains of 1/N channels. Since N for North Anna is 3 or 4, depending on the function, the Technical Specification requirement is to test one train and 1/3 or 1/4 of the channels, or a total of 1/6 or 1/8 of the systems. We now propose to test 1/3 or 1/4 of the systems, which is twice the specification requirement.

In view of the short deferrals requested, and the additional testing to be performed during the refueling outage, we believe that this request is justified, and will appreciate your timely approval.

Very truly yours,

C. M. Stallings

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

cc: Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
Region II

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