

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 23, 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, D. C. 20555

Serial No. 142C
PO/DLB:baw
Docket No: 50-338
License No: NPF-4

Subject: Amendment to Operating License
Exemptions from Technical Specifications
North Anna Power Station Unit No. 1

Dear Mr. Denton:

Our letter of March 13, 1979 requested an amendment to Operating License NPF-4 in the form of exemptions from certain requirements of the Technical Specifications and 10CFR50 Appendix J, Section D. The specific exemptions requested at that time involved, in part, the Type B and C leakage testing. As explained in our letter of May 4, 1973, we were able to complete a significant portion of these testing requirements during the snubber inspection outage in April. Additional tests were completed subsequent to our May 4, 1979 submittal. The purpose of this letter is to provide an update on testing completed to date and to identify the few remaining items for which a deferral is still required.

The remaining surveillance requirements for which a deferral is requested are listed in the attachment. All items listed in our letter of March 13, 1979 which are not listed in the attachment have been completed. Items completed to date include all Type B and C leak rate testing, all instrument calibrations, safety injection functional testing and emergency diesel generator testing.

In our March 13, 1979, letter we committed to perform time response tests on all channels of both trains of solid state protection during the first refueling outage. This effort would substantially exceed the testing requirements of the Technical Specifications (Section 4.3.1.1.3). Based on a comprehensive review of surveillance items, we have determined that a complete retest of all protection channels and trains is neither necessary nor warranted. We therefore withdraw that commitment.

Test requirements not yet completed include the remainder of safety equipment actuation and response time testing. We request permission for deferral of these few surveillance requirements until the first refueling outage which is scheduled to begin on September 15, 1979. Note that this will be a

424 281 7907260 804 P

deferral of only three weeks or less on a permissible test interval of 22.5 months. A deferral of this magnitude will have no significant effect on the ability of the systems to perform under accident conditions. Since the earliest of the remaining tests is due by August 26, 1979, we will greatly appreciate your timely approval of this request.

Very truly yours,

C. M. Stallings

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

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

ATTACHMENT

NORTH ANNA UNIT 1
REMAINING SURVEILLANCE REQUIREMENTS

1) Time Response Testing

T.S.	LAST DONE	18M DATE	18M + 25% DATE
4.3.1.1.3 (Sensors)	10/11/77	4/11/79	8/26/79
(Circuit)	10/13/77	4/13/79	8/28/79
(Slave Relays)	10/19/77	4/19/79	9/4/79
(UV Coil)	12/15/77	6/15/79	11/1/79

2) Safety Injection, Containment Depressurization Actuation, Station Blackout

T.S.	LAST DONE	18M DATE	18M + 25% DATE
4.6.2.1.C	10/25/77	4/25/79	9/10/79
4.6.2.2.1.C	10/25/77	4/25/79	9/10/79
4.6.2.3.C	10/25/77	4/25/79	9/10/79
4.6.3.1.2.a	10/20/77	4/20/79	9/5/79
4.6.3.1.2.b	10/25/77	4/25/79	9/10/79
4.7.4.1.d.2	10/25/77	4/25/79	9/10/79
4.7.8.1.d.2	10/25/77	4/25/79	9/10/79