

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 25, 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. 576
LQA/ESG:jab

Docket Nos. 50-338
50-339

Dear Mr. Denton:

In response to recent telephone conversations with members of the Staff concerning our letters of August 22, 1978 (Serial No. 424) and June 22, 1979 (Serial No. 459/060179) on the subject of environmental qualification of instruments, the following additional information is supplied.

In letter No. 424, we stated that a cautionary note would be placed in the emergency procedures warning the operator that the actual level in the pressurizer might be higher than indicated, and instructing him to terminate high head injection at a low indicated pressurizer level. Since that time, in response to IE Bulletin 79-06A, the operators have been instructed to avoid overreliance on pressurizer level indications, and to examine other plant parameters in assessing water inventory and plant conditions. In addition, new restrictions have been placed on termination of high head injection once it has been automatically actuated by low pressure conditions. This approach recognizes the desirability of assuring stable core conditions prior to terminating injection, as well as the fact that the integrity of the reactor vessel has been demonstrated for a steam line rupture transient condition for at least four (4) effective full power years, as described in the two letters previously referenced.

The fracture mechanics analysis performed by Westinghouse to demonstrate reactor vessel integrity was based on an initial flaw depth of one inch. This standard Westinghouse criterion requires that no flaw of one inch depth or less propagate under the conditions studied. Since the inservice inspection program should be able to detect flaws of one-half inch depth or greater, this criterion is conservatively chosen.

424 227
7907270 191

We trust that this information will permit you to complete your review of this matter.

Very truly yours,

C. M. Stallings

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

424 228