

September 18, 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. 722
PSE&C/CES:adw:mc
Docket Nos. 50-404
50-405

Dear Mr. Denton:

Our letter Serial No. 039 of February 6, 1979 advised you of our intention to inform you continually of Company positions which are not in accordance with individual Regulatory Guides. This letter advises you of the Company position on Regulatory Guide 1.135, Revision 0 "Normal Water Level and Discharge at Nuclear Power Plants" for the North Anna 3 and 4 units.

Company Position

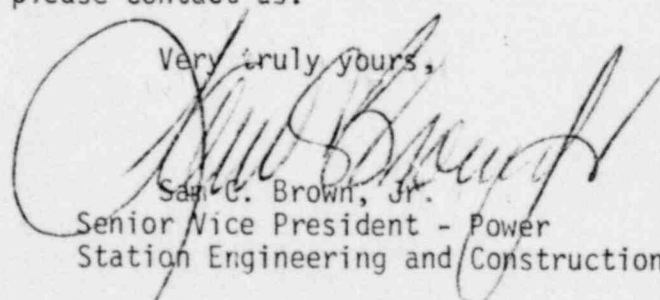
North Anna Units 3 and 4 comply with Regulatory Guide 1.135 with the following exception:

Section C.8 states that "Normal groundwater level should be the median level based on 20 years of data." Twenty years of historical data for the site, including the influence of Lake Anna, are unavailable. Normal site groundwater conditions for North Anna Units 3 and 4 are based on a conservative general prediction of groundwater elevations which includes the predicted effects of Lake Anna and the service water reservoir.

This position will be placed on file and will be included in the Final Safety Analysis Report for these units.

We would be pleased to discuss this position with you at your convenience. Should you wish to meet with us to discuss this position, or if you have any questions please contact us.

Very truly yours,



Sam C. Brown, Jr.
Senior Vice President - Power
Station Engineering and Construction

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