

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

November 22, 1978

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. 646  
PO/DLB:scj  
Docket No. 50-3384  
License No. NPF-4

Dear Mr. Denton:

Survey Monitoring T.S. Surveillance Requirement 4.7.12.1  
North Anna Power Station

We have experienced difficulties in completing the surveillance requirements of North Anna Unit No. 1 Technical Specification 4.7.12.1 due to inconsistencies between the surveillance requirements and the bases for the requirements, typographical errors in T. S. Table 3.7-5, and deficiencies in the survey monitoring program.

The basis for surveillance requirement 4.17.12.1 states "The first survey was conducted in May 1976 to establish a base value for all survey points". The basis implies that total and differential settlements should be based on May 1976 values; however, T.S. Table 3.7-5 specifies bases other than the May 1976 basis in several cases and does not specify base value dates for survey points established after May 1976.

Difficulties in obtaining total and differential settlement values involve 27 survey points addressed by T.S. 4.7.12.1. Attachment 1 is a listing of these survey points. The majority of the data acquisition difficulties encountered fit into one of two categories:

1. Destroyed and Reset Survey Points

Settlement histories are incomplete because some survey points have been destroyed due to construction activities and not immediately replaced.

2. Base Values Not Established On Date Required

Some points requiring a May 1976 base value were established after May 1976. Some points requiring base values on dates specified by T.S. Table 3.7-5 were not surveyed for a base value on the date specified.

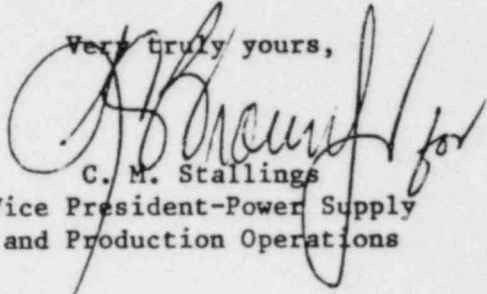
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We are currently reviewing all procedures and data from the first two and a half years of monitoring with the objective of improving our surveillance program. Actions to prevent future survey monitoring program deficiencies of the type described above and appropriate T.S. changes are being investigated.

There are no safety implications from any of the data collected thus far. Existing data verifies that no significant settlement has occurred. However, we believe the overall program will be enhanced by a total review of all aspects of settlement monitoring.

Very truly yours,

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

cc: Mr. James P. O'Reilly

T.S. TABLE 3.7-5 PROBLEM SURVEY POINTS

<u>SURVEY POINT</u>	<u>LOCATION</u>
7	Service Water Pump House
15, 16, 17, 18	Service Water Piping @SWPH
113	Unit 2 Main Steam Valve House
114	Service Building (E-17)
117	Service Building (E-14)
122	Auxiliary Building
142, 145, 146	Unit 1 Safeguards Area
144	Unit 1 Containment
158	Turbine Building
204	Intake Structure
206, 207, 208, 209	Boron Recovery Tank Dike
228	Decontamination Building
243	Service Building
246, 246	Fuel Oil Pump House
248, 249, 250, 251	Pipe Tunnel