

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**RICHMOND, VIRGINIA 23261**

**R. H. LEASBURG**  
VICE PRESIDENT  
NUCLEAR OPERATIONS

May 17, 1982

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attn: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Serial No. 226  
NO/DWL:acm  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
NORTH ANNA POWER STATION UNIT NOS. 1 AND 2  
RESPONSE TO GENERIC LETTER 82-05

In response to Generic Letter 82-05, Vepco has reviewed the status of each NUREG-0737 item identified on Enclosure 1 of the subject generic letter. The items identified in that enclosure are those items which had implementation dates between July 1, 1981 and March 1, 1982. Certain items in this time frame were not included in Enclosure 1 of Generic Letter 82-05 since they were currently under some form of NRC review or resolution. These later items were identified in Enclosure 2 of Generic Letter 82-05. Of the seven (7) Enclosure 1 items reviewed, four (4) items have been completed and are documented as such in the Vepco document titled "Response to NUREG-0737 Post-TMI Requirements". These completed items are: I.A.3.1 (Simulator Exams), II.B.4 (Training for Mitigating Core Damage), II.E.1.2 (Auxiliary Feedwater Initiation and Flow Indication), and II.E.4.2 (Containment Isolation Dependability). Vepco's "Response to NUREG-0737", was transmitted to the NRC staff for review via Letter No. 985 dated December 15, 1980. Since the original transmittal of this document, Vepco has twice updated our schedule (and subsequently our response) via Letter Nos. 358 and 655 dated June 18, 1981 and December 9, 1981, respectively.

The three (3) remaining items, II.B.2 (Plant Shielding), II.B.3 (Post-Accident Sampling), and II.F.1 (Accident Monitoring Instrumentation) are all in various stages of completion. Although each of these items was scheduled in NUREG-0737 for completion by January 1, 1982, Vepco has provided, by letter and by updates to our "Response to NUREG-0737", formal notification of our intent to establish realistic target dates for the completion of these items after January 1, 1982. Extensions past January 1, 1982 were necessary as a result of equipment delivery problems, outage scheduling, and, in some cases, the unavailability of environmentally qualified components and/or equipment vendor supplies and support.

The attachment to this letter provides the current status of items II.B.2, II.B.3, and II.F.1 (Parts 1 through 6). Each status provided will include the currently expected completion schedule, justification for that schedule, and a statement of interim actions currently in effect. In most cases, the dates provided in the attachment exceed the most recent documented schedules for

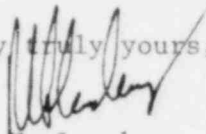
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completion. This results from taking a thorough, realistic look at the details of work remaining and at the material delivery and construction schedules. An update to our "Response to NUREG-0737" is planned for early June 1982. This new information will be included in that update.

It is recognized that the attached schedules require that a request be made to amend the North Anna Unit No. 2 Operating License. This amendment request is being prepared for submittal to the NRC staff for review.

Please contact us if you require additional information regarding the status of the NUREG-0737 items identified in Generic Letter 82-05.

Very truly yours,

  
R. H. Leasburg

Attachments

cc: Mr. James P. O'Reilly  
Regional Administrator  
Region II  
U. S. Nuclear Regulatory Commission  
Atlanta, Ga. 30303

Mr. Robert A. Clark, Chief  
Operating Reactors Branch No. 3  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

COMMONWEALTH OF VIRGINIA )  
 )  
CITY OF RICHMOND )

The foregoing document was acknowledged before me, in and for the City and Commonwealth aforesaid, today by R. H. Leasburg, who is Vice President-Nuclear Operations, of the Virginia Electric and Power Company. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 17<sup>th</sup> day of May, 19 82.

My Commission expires: 2-26, 19 85.

Anna C. McSee  
Notary Public

(SEAL)

NORTH ANNA POWER STATION

NUREG-0737, Item II.B.2

Design Review of Plant Shielding and Environmental Qualification of Equipment for Spaces/Systems Which May Be Used in Post-Accident Operations

All requirements of Item II.B.2 will be met for North Anna Power Station when two pending modifications are completed. These modifications are: 1) the installation of remotely operated valves in the Atmosphere Cleanup System and 2) the replacement of Teflon support pads with Torlon support pads (Unit 1 only) on the Low Head Safety Injection (LHSI) pumps and Outside Recirculation Spray (ORS) pumps.

The delay in completing these modifications past January 1, 1982 was caused by equipment delivery problems primarily involving procurement of the necessary remote operated valves. Accordingly, NUREG-0737 allowed an automatic extension of the implementation date to the first outage of sufficient duration to perform the modifications but no later than July 1, 1982. Unit 2 is currently in a refueling outage and Unit 1 is scheduled for a refueling outage in early summer. Since portions of the Atmosphere Cleanup System are shared, completion of the Unit 1 modification is necessary in order for the Unit 2 system to be fully operable. Our plans are to complete these modifications by the end of the Unit 1 outage which may exceed the July 1, 1982 date. Therefore, our intent is to comply with Item II.B.2 requirements by the end of the upcoming Unit 1 refueling outage, but our commitment is to comply with Item II.B.2 no later than January 1, 1983. This additional time is needed to account for unforeseen problems in the final installation and testing. This schedule will require an amendment to the North Anna Unit 2 Operating License. This amendment request is currently being prepared for submittal and NRC staff review.

It should be noted that the installation of the remotely operated valves mentioned above meets the requirements of Item II.B.2. The installation of these valves are, however, only part of a larger work scope which installs and test new or modified equipment and systems. This fact is pointed out since we wish to identify our position that compliance with Item II.B.2 may not necessarily be verified through the review of completed Design Change Package documentation.

NUREG-0737, Item II.B.3

Post-Accident Sampling System

The Reactor Coolant Sampling System at North Anna will be operational by September 1, 1982. Vendor equipment delays resulted in schedule delays past January 1, 1982. The system components were received in late 1981. Currently, the Reactor Coolant Sampling System is installed and is undergoing start-up testing. It is anticipated that testing will be complete and the system operational by July 1, 1982. However, an additional 60 days is requested to account for unforeseen problems in the testing of this sampling system. Interim sampling procedures as required by the short-term TMI requirements will be in effect until this system is fully operational.

The Containment Atmosphere Sampling System at North Anna will be operational no later than January 1, 1983. It is anticipated that all installation will be complete by July 1, 1982 except for the installation of sample supply line

heat tracing components and insulation. At this time, an equipment delivery date for the heat trace equipment is not final, but is expected in Fall, 1982. The schedule extension is necessary to accomodate this material delivery uncertainty.

This schedule will require an amendment to the North Anna Unit 2 Operating License. This amendment request is currently being prepared for submittal and NRC staff review.

The interim sampling procedures required by the short-term TMI requirements will remain in effect until the permanent Containment Atmosphere Sampling System is operational.

NUREG-0737, Item II.F.1  
Accident Monitoring Instrumentation

Parts 1 and 2 of Item II.F.1 deal with noble gas, iodine and particulate effluent monitoring. The Main Steam Effluent Monitoring System is installed and operational. The Process and Vent Effluent Monitor and the Steam Driven Auxiliary Feedwater Exhaust Effluent Monitor Systems are being installed. In addition to the necessary start-up testing of these systems, the Steam Driven Auxiliary Feedwater Exhaust Effluent Monitor System requires an in-situ calibration. This calibration is planned for Summer, 1982. Of primary schedular concern is an item which was recently identified pertaining to the effluent monitor systems. In order to meet the accuracy requirements of Item II.F.1, part 2, it is necessary to heat trace the vent stack sample lines. Installation of heat tracing in this area was planned but it was not considered a requirement until the impact on the system accuracy was identified. It is anticipated that all effluent monitoring equipment installation will be complete by July 1, 1982 except for the Vent Stack heat tracing system. In order to provide the necessary time to procure and install the vent stack sample line heat tracing system, our commitment is to have all the II.F.1 effluent monitoring systems operational by January 1, 1983. This schedule will require an amendment to the North Anna Unit 2 Operating License. This amendment request is currently being prepared for submittal and NRC staff review.

The schedule extension past January 1, 1982 was necessary due to some material delivery delays of the effluent monitoring equipment until late 1981. The extension past July 1, 1982 is necessary to accomodate the recently identified need to install the vent stack sample line heat trace system. In the interim, the Increased Range Radition Monitors, installed in response to the short term TMI requirements, will be used until the effluent monitors discussed above are operational.

Part 3 of Item II.F.1 deals with the Containment High Range Radiation Monitors. This system has been installed and is undergoing startup testing. This testing should be complete by July 1, 1982. The system will not be considered operable as of July 1, 1982 since the final in-situ calibration will not have been performed. The vendor of this system (Victoreen) does not have equipment, procedures, or sources acceptable to perform this calibration at this time. Victoreen is expediting the development and procurement of a calibration system.

Vepco has not received a commitment from Victoreen as to when calibration services will be available to us. Therefore, our commitment on this item is to perform the in-situ calibration during the first scheduled outage after availability of a calibration system to Vepco. This schedule will require an amendment to the North Anna Unit 2 Operating License. This amendment request is currently being prepared for submittal and NRC staff review.

The in-containment electrical terminations for the Containment High Range Monitors have been made using interim termination procedures. This is because environmentally qualified terminations are not available at this time. Qualified terminations will be provided in accordance with our response to I&E Bulletin 79-01B on a schedule consistent with the Proposed Rule on Environmental Qualification (Federal Register Notice dated Wednesday, January 20, 1982-Vol.47, No. 13) which requires completion no later than the second refueling outage after March 31, 1982.

Part 4 deals with Containment Pressure Monitors. This system has been installed and tested and is currently operational. This system, however, is currently utilizing transmitters which have not been environmentally qualified. However, the best available transmitters are being used in the interim. It is anticipated that the existing transmitters will be qualified once testing is complete. If not, qualified transmitters will be provided in accordance with our response to I&E Bulletin 79-01B on a schedule consistent with the Proposed Rule on Environmental Qualification. (Federal Register Notice dated Wednesday, January 20, 1982-Vol. 47, No. 13)

Part 5 which deals with Containment Water Level Monitors is complete.

Part 6 of Item II.F.1 deals with Containment Hydrogen Monitors. The new Hydrogen Monitors are installed and tested but are not connected to the sample supply and return lines since these lines are still under construction. The sample return lines for this system are shared, in part, with the Containment Atmosphere Sample System of Item II.B.3. Our commitment is to meet the requirements of Item II.F.1, part 6, no later than January 1, 1983. The reason for the schedule extension past January 1, 1982 is in part due to the material delivery problems of sample line valves previously discussed in Item II.B.2. These valves are currently installed. The extension past the July 1, 1982 implementation date, is to account for the procurement and installation of the sample supply line Category I heat tracing system. This schedule will require an amendment to the North Anna Unit 2 Operating License. This amendment request is currently being prepared for submittal and NRC staff review.

In the interim, the existing hydrogen analysers installed in the plant will remain operational until the new Hydrogen Monitor System is operable.