

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

R. H. LEASBURG
VICE PRESIDENT
NUCLEAR OPERATIONS

June 8, 1982

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 387C
NO/RGS:ms
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

ADDITIONAL INFORMATION ON
RESPONSE TO NRC TECHNICAL EVALUATION
BYPASS AND RESET OF ENGINEERING SAFETY FEATURES
NORTH ANNA UNIT NOS. 1 AND 2

We have received and reviewed a draft copy of a Franklin Research Center (FRC) Technical Evaluation Report (TER) titled "Override and Reset of Control Circuitry in the Ventilation Purge Isolation and Other Engineered Safety Features System (B-24)" NRC TAC No. 10161 dated April 28, 1982 (revised) forwarded to us by Mr. L. B. Engle (NRC) in May 1982. We appreciate the opportunity that Mr. Engle has afforded us in reviewing the FRC draft report.

In our letter Serial No. 387B dated February 19, 1982, we indicated the results of our review and proposed modifications to satisfy six (6) criteria established by the NRC/FRC for the technical evaluation of bypass and reset of Engineered Safety Features (ESF) for North Anna. We are in agreement with the TER in all respects except Section 4.2.3.3 Conclusions and Recommendations regarding our position on Criterion 3.

Criterion 3 - A system level annunciation of the overridden status should be provided for every safety system impacted when any override is active. (See R.G. 1.47).

NRC REQUEST:

"System employing pushbutton actuated "resets" (i.e., Containment Isolation Phase A and B, Containment Spray, and Feedwater Bypass Isolation) do not comply with Criterion 3. These "resets" actually function as overrides and require system level annunciation."

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VEPCO RESPONSE:

As a result of further evaluation of the functional diagrams (Attachment) for the ESF signals and discussions with Station personnel, we have determined that the "resets" for the Containment Phase A/B and Containment Spray systems actually do provide input to system level annunciation. If a safeguard actuation signal is applied to the above circuits, the appropriate annunciator window will be illuminated. The only means to clear these alarms is to operate the appropriate Train A & B reset push-buttons which will extinguish the annunciator window. As a result, the status of these system level annunciators can be used by the operator to verify that a signal has been reset (overridden). Operating and Annunciator Response procedures will be updated to state that these annunciators provide information as to the reset status of the associated ESF signals.

Based on the modifications Vepco has agreed to make to the feedwater bypass valve circuitry to address Criterion 1, Feedwater Bypass Isolation is no longer an issue under Criterion 3.

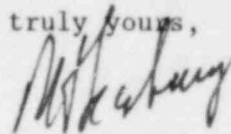
If changes were made to provide additional annunciation for the above systems, extensive changes to the Westinghouse solid state protection systems, including alterations to the Safeguards Driver printed circuit card, would be necessary. Based on the above assessment of the need and impact of providing redundant system level annunciation for the subject systems, Vepco does not intend to proceed with this modification.

In summary, FRC has performed the ESF review against Regulatory Guide 1.47 although this guideline does not apply to North Anna. Regulatory Guide 1.47 was issued in May 1973, two (2) years after the Construction Permits were issued (February 19, 1971) by the NRC for North Anna Units 1 and 2. Even though Regulatory Guide 1.47 was not incorporated in the design basis of the plant, we feel that based on the above discussion that our design meets the intent of Regulatory Guide 1.47.

We are in the process of evaluating all NRC and Vepco commitments for implementing modifications over the next several years during regular maintenance and refueling outages at North Anna. We are attempting to reconfirm commitment dates on implementation of Criterion 1, 2, 4, 5 and 6 presently scheduled during these outages. Since the final resolution to Criterion 3 has not been determined, we can not provide an estimated schedule for implementation, if required, at this time. Once we receive concurrence from the NRC on our proposed ESF modifications, Vepco will be able to finalize the implementation schedule.

If we can be of assistance in clarifying or interpreting information submitted with this response, please advise.

Very truly yours,



R. H. Leasburg

cc: Mr. R. C. DeYoung, Director
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