

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

May 1, 1984

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. 231  
NO/JDH:pr  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
NORTH ANNA UNITS 1 AND 2  
APPENDIX R - FIRE PROTECTION

In early October 1983 Vepco recognized that its level of understanding of the fire protection issues embodied in Appendix R to 10CFR50 had not been adequate to fully address all the implications contained in the regulation. This recognition had occurred as a result of both additional NRC guidance and recent fire protection inspection results at North Anna. At that time, we immediately embarked on a comprehensive reanalysis of our fire protection program to insure that we would be in full compliance with the requirements.

On January 27, 1984, we met in Bethesda with members of your staff and the Region II office. We provided a brief history of Vepco's efforts in the area of fire protection, described our earlier actions and intended modifications as a result of our original analysis, and discussed the scope and bases for our reanalysis. We committed to submit - by May 1, 1984, for North Anna\* and by July 6, 1984, for Surry - any additional exemption requests and descriptions of any additional modifications resulting from that reanalysis.

Our reanalysis has demonstrated that the large majority of actions and schedules previously identified in our June 22, 1982 submittal remained valid. As expected, the reanalysis also identified several new areas where modifications were necessary or exemption requests were appropriate. In accordance with our commitment, we are submitting the attached exemption requests and descriptions of modifications. The descriptions include the associated schedule for each modification and specify where compensatory measures have been taken in the interim until the modifications are completed. We believe that, upon completion of the actions described in the attachments, we will be in full compliance with the regulation.

\*Original commitment was May 15, 1984. Revised outage schedule resulted in changed commitment date.

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See Attached  
VEPCO note*

Although the attached information has been written as a stand-alone document to facilitate your review, it represents only two chapters (designated Volume II) in our fire protection reanalysis report. The remaining chapters (designated Volume I), which contain an introduction and executive summary, description of all fire areas, a safe shutdown analysis, an Appendix R compliance summary, and a description of alternative shutdown systems, will also be submitted to NRC. In addition to the complete reanalysis report described above, the drawings, diagrams, and other background information used in its development will be available onsite.

Ten copies of the attached information are provided. Five copies of the report contain original photographs. Additional copies of both the report and photographs are available upon request.

Please contact us if you have any questions regarding this matter.

Very truly yours,

  
W. L. Stewart

Attachments

cc: Mr. J. P. O'Reilly  
Regional Administrator  
NRC Region II

Mr. R. C. DeYoung, Director  
Office of Inspection and Enforcement

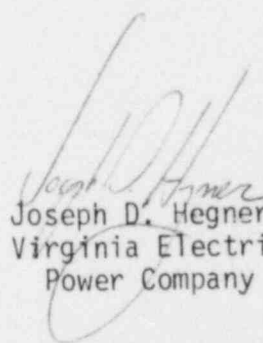
Mr. M. W. Branch  
NRC Resident Inspector  
North Anna Power Station

Mr. W. H. Miller  
NRC Region II

May 1, 1984

NOTE TO NRC MAIL ROOM:

Ten copies (including original) are being submitted. However, four copies were hand-carried directly to Mr. Leon Engle, the NRC North Anna Project Manager. Enclosed is the original plus the remaining five copies.



Joseph D. Hegner  
Virginia Electric &  
Power Company