

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

April 18, 1991

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 91-205
NAPS/CSW/TAH-R5
Docket No. 50-338
License No. NPF-4

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT NO. 1
SEISMIC MONITORING INSTRUMENTATION
TECHNICAL SPECIFICATION 3.3.3.3 SPECIAL REPORT

On March 18, 1991, station personnel determined that the Triaxial Response Spectrum Recorders of the Seismic Monitoring System do not meet the Technical Specification required measurement range of 1-30 Hz. Failure to meet this measurement range caused the instruments to be considered technically inoperable. Subsequently, the Action Statement for Technical Specification 3.3.3.3 was entered. Since this Action Statement requires a Special Report for seismic monitoring instrumentation inoperable for more than thirty days, this event is reportable pursuant to Technical Specification 6.9.2.

We have investigated this problem and determined that our May 27, 1986 license amendment request (issued as Amendment 80), which established the current measurement range requirements of the Triaxial Response Spectrum Recorders, was in error. This request did not conform to the specifications of the existing instrumentation or to the Updated Final Safety Analysis Report (UFSAR) Chapter 3, Design Criteria, Appendix A, Compliance With Safety Guides, which confirmed our compliance, with several exceptions, to Regulatory Guide 1.12, Instrumentation for Earthquakes. One exception provided in that appendix is the Triaxial Response Spectrum Recorder frequency measurement range of 2-25.4 Hz instead of the 1-30 Hz range specified in the regulatory guide.

When the amendment containing the modification to the appendix was submitted during the development of the original FSAR, the change of the response range, stated in the exception, was inadvertently omitted in updating the component descriptions currently in section 3.7.4.5 of UFSAR Chapter 3. This omission resulted in an incorrect measurement range being specified in the license amendment request.

The recorders, although inoperable pursuant to the Technical Specification definition, are capable of performing their design functions and comply with the requirements of Regulatory Guide 1.12, as modified by our stated exceptions.

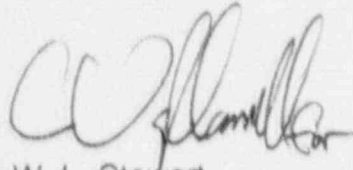
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To reconcile this discrepancy, we will correct Section 3.7.4.5 of the UFSAR to agree with the exceptions to RG 1.12 as stated in UFSAR Chapter 3 Appendix A. We will also submit a license amendment to reflect the correct instrument measurement ranges for Triaxial Response-Spectrum Recorders in Technical Specification 3.3.3.3, Table 3.3-7 Items 4a-4d as determined by the UFSAR Chapter 3 Appendix A.

If you have any questions, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachment

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Mr. M. S. Lesser
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