

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

March 16, 1984

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

Serial No. 614A
NO/JHL: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
REACTOR COOLANT SYSTEM VENTS

In our letter dated June 9, 1983 (Serial No. 333A), Vepco submitted proposed Technical Specification changes, for North Anna Unit Nos. 1 and 2, which were related to the Reactor Vessel Head Vents (RVHV). In that letter, we stated that the RVHV's were installed and considered operational but they remain isolated by having the manual isolation valves closed. Further, final implementation of these proposed Technical Specifications were to be coordinated with the implementation of the revised emergency operating procedures prior to issuance of the amendment.

In our letter dated October 28, 1983 (Serial No. 614), Vepco requested an exemption from 10 CFR 50.44(c)(3)(iii) for North Anna Unit Nos. 1 and 2, because of a misinterpretation of the rule. Specifically the requirements for procedures and the training of personnel to operate the RVHV's in accordance with the schedule provided in the rule was misunderstood. Vepco did not intend on testing and providing formal procedures for the RVHV's until the revised emergency operating procedures are implemented which is currently scheduled for April 15, 1984. The RVHV's were functionally tested but were electrically disconnected. We stated that in the event of an emergency, the RVHV's could be energized and used with the guidance of generic procedures.

Our two previous letters do not provide a consistent status of the RVHV's at North Anna Unit Nos. 1 and 2. The October 28, 1983 letter states that the RVHV's were installed, operational, and functionally tested but were electrically disconnected. That letter implied operability. Our earlier letter of June 9, 1983 stated that the RVHV's were installed and operational, but they remained isolated by having the manual isolation valves closed. Having the manual isolation valves closed precludes operation of the system remotely.

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It has been Vepco's intent to retain the manual isolation valves closed until the implementation of the EOP's. Vepco will open the manual isolation valve on North Anna Unit No. 1 prior to returning to power from the upcoming refueling outage. The manual isolation valve on North Anna Unit No. 2 will be opened by the spring maintenance outage which is currently scheduled for March 30, 1984. Vepco will administratively control the energized SOV's when the manual isolation valves are opened in order to maintain the SOV's closed.

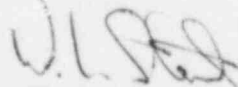
During the time between the implementation of the EOP's and the opening of the manual isolation valve on Unit 1, the system cannot be operated in the event of an accident. The continued operation of Unit 1 in this condition is acceptable based on the present procedures for recognizing and mitigating the formation of a steam or non-condensable gas bubble in the Reactor Head region. These procedures specifically guide the operator to recompression of the bubble and re-establishing the pressurizer bubble. The non-condensable gases that would accumulate in the pressurizer head region can be removed by the pressurizer vent or by the PORV's. Moreover, the likelihood of having such an event in this relatively short period of time is very low.

If the RVHV's become inoperable between implementation of the EOP's and the issuance of Technical Specifications, the system will be treated in accordance with the proposed Technical Specification changes.

Vepco will consider the RVHV's fully operational when the manual isolation valves on the RVHV's are opened and when training and emergency procedures are established.

Due to the previous misunderstanding, Vepco requests an exemption from 10 CFR 50.44(c)(3)(iii) for North Anna Unit Nos. 1 and 2. Vepco requests that the operability of the RVHV's be implemented during the outages previously mentioned and the procedures and training be implemented with the implementation of the revised emergency operating procedures.

Very truly yours,


W. L. Stewart

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

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