

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

March 30, 1984

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

Serial No. 161
E&C/TLG:
Dockets Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

NUREG-0612 - CONTROL OF HEAVY LOADS
PHASE I
NORTH ANNA POWER STATION
UNITS 1 AND 2

Gentlemen:

In response to your February 21, 1984 and February 28, 1984 telephone request for additional information required to complete Franklin Research Center's (FRC) review of Vepco's submittal for North Anna Power Station Units 1 and 2 conformance to NUREG-0612 "Control of Heavy Loads at Nuclear Power Plants" Phase I, the following is provided.

Special Lifting Devices [Guideline 4 NUREG-0612, Section 5.1.1(4)]

ANSI N14.6 Section 5.3 requires annually, either a 150 percent maximum load test or dimensional visual and non-destructive testing of major load carrying welds and critical areas. As previously stated, Vepco noted a 150 percent load test is impractical in that these special lifting devices are in the containment. However, procedures require that each device, its welds and any bolted joints be visually inspected prior to use. It was also noted that a load cell is used with both the reactor vessel head and internals lift rigs for continued monitoring during all lifting and lowering.

It was Vepco's intention that through the use of procedures requiring visual inspection prior to use, continued monitoring via load cells during all lifting and lowering operations, along with the simplicity and specific designs of the devices, and the frequency of use, as well as, the controlled conditions of use, the intent of ANSI N14.6-1978 continuing compliance would be satisfied.

Further investigations, discussions and reviews of these procedures, controls and operations show that to ensure a more reliable and higher level of confidence in the continuing compliance with ANSI N14.6 - 1978, a Non-Destructive Examination program should be established. Therefore, Vepco has taken actions to establish such a program in addition to the existing procedural requirements and controls.

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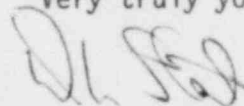
North Anna has reviewed the existing operating and maintenance procedures to ensure the appropriate visual inspections and controls are in place and that any additional inspection or hold points are incorporated. This approach is consistent with Westinghouse's (the designer, fabricator and supplier) recommendations. In addition to the existing procedures, an additional procedure has been written to provide for preventive maintenance requirements for the prior-to-use inspection and a 10 year periodic inspection of the special lifting devices located within the containment.

The new mechanical maintenance procedure provided not only for the routine prior to use inspection of the lifting devices, but also provides for a Non Destructive Examination (NDE) Program and documentation. This NDE Program shall provide for an inspection and NDE of all critical welds and critical parts over a normal inservice inspection interval of 10 years.

Any procedures requiring revisions or additions, as well as, the new mechanical maintenance procedure establishing the NDE Program will be completed and in effect by the next refueling outage or movement of any heavy load should it occur before the outage.

It is Vepco's belief that the measures taken to control and monitor the use and maintenance of the special lifting devices more than adequately meets the intent NUREG 0612 and the ANSI N14.6-1978 requirements. It is also believed that this letter provides the information to complete Phase I review as requested in our most recent telephone conversations.

Very truly yours,



W. L. Stewart

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

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