VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

October 5, 1984

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

Serial No: 470
NO/DWL,JPS/lms
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
SHORTER DURATION TYPE A TESTING REQUIREMENTS

In accordance with the North Anna Power Station Unit Nos. 1 and 2 Technical Specifications 3/4.6.1.2, the provisions and methods of Appendix J to 10 CFR Part 50 and ANSI N45.4-1972 govern the Type A test duration. ANSI N45.4-1972, Section 7.9, Computation of Leakage Rate-The Absolute Method, states that "Leakage rates shall therefore be calculated on at least an hourly basis for 24 consecutive hours (or other agreed upon period)".

Provisions for shorter duration Type A testing have been approved by the NRC. These provisions are specified in the Bechtel topical report BN-TOP-1, Revision 1, November 1972. These provisions have been used since 1980 as the basis to develop appropriate test acceptance criteria in order to permit shorter duration Type A testing at our Surry Power Station. Beginning with the current Unit 2 refueling outage, it is our intent to use the shorter duration test acceptance criteria for North Anna Units 1 and 2 Type A tests until the ANS 56.8 Standard Committee develops new criteria for shorter duration testing based on the Mass Point Analysis Method.

North Anna's Type A test acceptance criteria for shorter duration testing is based on the Mass Point Analysis Method as well as on BN-TOP-1 criteria. If, however, the full 24 hour duration is performed, only the Mass Point Analysis Method criteria would apply.

The Vepco Integrated Leak Rate Test computer program contains the required BN-TOP-1 test methodology (Total Time Analysis) as well as the Mass Point Analysis methodology. This computer program has been used on several Surry Type A tests and the results of this program have been reviewed by NRC Region II inspectors.

A017
1/0

Vepco is aware of the problems encountered at the Zion Nuclear Station in their attempts to perform a shorter duration Type A testing. Therefore, we have reviewed our intended test acceptance criteria and we are confident that we will be in compliance with the Type A test duration criteria obtained by the methodology of BN-TOP-1.

If you have any questions or concerns regarding our approach, please contact us at your earliest convenience.

Very truly yours,

W. L. Stewart

cc: Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission

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