

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 20, 1992

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 92-450C
NL&P/JBL: R4
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
CHANGE OF PROJECT SCOPE AND SUBMITTAL SCHEDULE
FOR THE SERVICE WATER SYSTEM RESTORATION PROJECT

By letters dated May 18 and July 16, 1992 (Serial Nos. 92-287 and 92-450), Virginia Electric and Power Company informed the NRC of plans to perform extensive refurbishment activities for restoration of certain portions of the service water system at North Anna Power Station. Our July 16, 1992 letter requested a temporary exemption from the requirements of 10 CFR Part 50, Appendix A, Criterion 2 (GDC-2), "Design basis for protection against natural phenomena," to allow excavation of certain portions of the piping during Stages 1, 2, 3, and 4 of Phase I. (Phase I of the service water system restoration project was to be implemented in five stages.) This letter is to inform you that Phase I, Stage 2 of the service water restoration project has been deleted and the temporary exemption from the requirements of GDC-2 for Phase I, Stage 2 will no longer be required.

Phase I, Stage 2 of the project was to have added manways in the 36-inch main service water supply and return headers just south of the service building. The primary purpose for the addition of these manways was to provide better access for the 24-inch service water pipe repairs planned for Stages 3 and 5. The Stage 2 manway additions were scheduled to be installed during the period between the Unit 1 steam generator replacement outage and the 1993 Unit 2 refueling outage. Continuing development of the project has eliminated the need for these manways to perform the necessary pipe repairs planned for Stages 3 and 5.

A brief summary of our current plans for completing Phase I of the service water restoration project is provided below. Our proposed schedule for submittal and requested NRC approval of the GDC-2 exemption requests for the remaining stages of the Phase I restoration project is also provided.

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Stage 3 -- Unit 2 Recirculation Spray Heat Exchanger Piping Repair

This portion of the project will provide for repair and replacement of sections of the 24-inch service water piping to the Unit 2 containment recirculation spray heat exchangers in very similar fashion to that described in our July 16, 1992 submittal for Unit 1. This effort will involve a temporary exemption from GDC-2 for a period of time beginning approximately 30 days prior to and ending approximately 30 days following the Unit 2 outage scheduled to begin in September of 1993. It will also involve four entries into the 168-hour Action Statement of Technical Specification 3.7.4.1 associated with service water upgrades for North Anna Units 1 and 2.

Additional details supporting the exemption request for Phase I, Stage 3 of the project will be provided not later than February 17, 1993 and NRC approval will be requested by August 4, 1993.

Stage 4 -- Auxiliary Service Water Supply Piping Repair

This portion of the project will include repair and replacement of the two 24-inch auxiliary service water lines from Lake Anna. New access manways in the auxiliary service water lines will also be added as part of this effort. This work is scheduled to be performed during the concurrent operating period beginning in January of 1994 and ending prior to the Unit 1 refueling outage scheduled to start in October of 1994. Because missile shielding will be temporarily removed from portions of the auxiliary service water lines to allow tie-in of the new lines, a temporary exemption from the requirements of GDC-2 will also be required for this stage of the project. However, at this time, we anticipate that no Action Statement entries will be required for implementation of this stage of the project.

Detailed information supporting the exemption request for Phase I, Stage 4 of the project will be submitted no later than June 30, 1993 and NRC approval will be requested by December 31, 1993.


Stage 5 -- Component Cooling Water Heat Exchanger Piping Repair

This final stage of Phase I will address the 24-inch service water supply and return piping to the Unit 1 and Unit 2 component cooling water heat exchangers. Repairs to this piping will be performed in similar fashion to that described in our July 16, 1992 letter for the 24-inch service water piping to the Unit 1 recirculation spray heat exchangers. This effort will not involve a GDC-2 exemption but will involve several Action Statement entries during implementation of the repairs on Unit 1 (during the October 1994 outage) and again on Unit 2 (during the April 1995 outage).

Elimination of Phase I, Stage 2 of the project scope removes the need for a temporary exemption from GDC-2 for that period of time associated with Stage 2 and will reduce the total number of entries into the 168-hour Action Statement for Phase I of the

project. If you have any questions on this change of work scope or our revised submittal schedule, please contact us.

Very truly yours,



W. L. Stewart
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