



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

December 3, 1992

Docket Nos. 50-338  
and 50-339

Mr. W. L. Stewart  
Senior Vice President - Nuclear  
Virginia Electric and Power Company  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

Dear Mr. Stewart:

SUBJECT: NORTH ANNA POWER STATION, UNITS NO. 1 AND NO. 2 (NA-1&2)  
EXEMPTION FROM REQUIREMENTS OF 10 CFR PART 50, APPENDIX  
A, GENERAL DESIGN CRITERION-2 FOR NA-1&2 (TAC NOS.  
M84103 AND M84458) AND EXEMPTION FROM REQUIREMENTS OF  
10 CFR 50.49, ENVIRONMENTAL QUALIFICATION OF ELECTRIC  
EQUIPMENT IMPORTANT TO SAFETY FOR NUCLEAR POWER PLANTS  
FOR NA-2 (TAC NO. M84487)

The Commission has issued the enclosed exemptions from the requirements of 10 CFR Part 50, Appendix A, General Design Criterion-2 (GDC-2), for NA-1&2, and from the requirements of 10 CFR 50.49, Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants, for NA-2.

The Virginia Electric and Power Company (VEPCO) plans to perform refurbishment activities for restoration of certain portions of the service water system (SWS) at NA-1&2 during the forthcoming NA-1 steam generator replacement program (SGRP). Implementation of the SWS repair and replacement program requires removing the surrounding earth and/or concrete encasement of certain portions of normally buried SW headers. As a result, the normal design basis protection against natural phenomena afforded by earth and concrete encasement will temporarily be removed from certain SW components. Therefore, pursuant to 10 CFR 50.12(a), VEPCO has requested a temporary exemption from the requirements of 10 CFR Part 50, Appendix A, GDC-2, for NA-1&2 during the Phase 1, Stage 1 SWS restoration activities. Based on the current NA-1 SGRP outage schedule, VEPCO has requested that the GDC-2 exemption period be from December 1, 1992 until June 30, 1993.

Also, during most of the Phase 1 stage of the SW restoration project, it will be necessary to isolate SW from the NA-1 control room chillers. VEPCO plans to provide a temporary water supply and return path to the NA-1 control room chillers from the common bearing cooling water system to provide normal control room temperatures and provide a reliable backup cooling system to the NA-2 air conditioning chillers. However, this will affect the normal environmental qualification design basis for the NA-2 control room chillers. Therefore, pursuant to 10 CFR 50.12(a), VEPCO has requested a temporary exemption from the requirements of 10 CFR 50.49, Environmental Qualification

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Mr. W. L. Stewart

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of Electric Equipment Important to Safety for Nuclear Power Plants, for NA-2 for approximately the duration of the NA-1 SGRP outage.

The staff notes that Phase I Stage I of the SW restoration project is not in conformance with NRC guidance in Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," relative to performance of on-line preventive maintenance in that you plan repeated entering and exiting of LCO action statements. You have been made aware of the staff's concerns and have planned adequate compensatory measures and taken other steps to minimize risks.

A safety evaluation supporting the above exemptions is also enclosed. Also, a copy of the exemptions is being forwarded to the Office of Federal Register for publication.

Sincerely,

(Original Signed By)

Herbert N. Berkow, Director  
Project Directorate II-2  
Division of Reactor Projects I/II  
Office of Nuclear Reactor Regulation

Enclosures:

1. Exemptions
2. Safety Evaluation

cc w/enclosures:

See next page

|      |                  |                  |                   |                 |          |
|------|------------------|------------------|-------------------|-----------------|----------|
| OFC  | LA:PD22:DRPE     | PM:PD22:DRPE     | D:PD22:DRPE       | OGC <i>g/b</i>  | AD:R-II  |
| NAME | ETANA <i>ETT</i> | LENGLE <i>ms</i> | HBERKOW <i>ms</i> | <i>G. Hauer</i> | GLAINAS  |
| DATE | 12/1/92          | 12/1/92          | 12/1/92           | 12/3/92         | 12/13/92 |
| OFC  | D:DSSA GHolanan  | D:DRPE           |                   |                 |          |
| NAME | ATHADANI for     | SVARGA           |                   |                 |          |
| DATE | 12/2/92          | 12/3             |                   |                 |          |

Doc Name: A:84103.1tr

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North Anna Power Station  
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Memorandum Dated December 3, 1992

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