

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

October 21, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Edward J. Butcher, Acting Chief
Operating Reactors Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 85-750
NO/DJV:acm
Docket No. 50-338
License No. NPF-4

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT 1
GENERAL DESIGN CRITERIA 17 MODIFICATION STATUS

In our letters dated May 15, 1984 and June 18, 1984, Serial Nos. 253 and 253A, and as documented in the NRC Updated Safety Evaluation Report dated November 13, 1984, we committed to install new torque switch limiter plates on certain MOVs. This commitment was considered an enhancement and not required to satisfy GDC-17 requirements since the MOVs had been shown by analysis to operate during an emergency when the voltage on the 480 volt bus is between 80 and 90 percent of the rated motor voltage. Our commitment was based on the detailed Five Year Summary Report dated January 1, 1984 and revised on April 1, 1984 and indicated a completion date at the end of the Unit 1 1986 Refueling Outage.

At the time of our commitment, the next North Anna 1 refueling outage was scheduled to begin April 11, 1986. Subsequently, the outage was rescheduled to begin at an earlier date, November 1, 1985. This was done to avoid four refueling outages in one year for our two nuclear stations. In the past, when we have scheduled two refueling outages in close succession, we have experienced substantial declines in employee productivity and efficiency. In addition, two closely scheduled refueling outages at one station places a heavy burden on station personnel. We therefore decided to reschedule our North Anna Unit 1 outage to avoid this close succession.

The rescheduling of the outage has had an adverse impact on our ability to complete installation of 11 out of 26 MOV rerates due to our Company policy known as the "Thirty-Day Rule".

Our Company policy which governs the scheduling of plant modifications during refueling outages requires all engineering and materials for a project to be on site thirty days prior to the outage. This "Thirty-Day Rule" is necessary to allow sufficient time to schedule installation of all plant modification projects and to determine manpower requirements needed to perform the modifications. Past practices have indicated that a time period of less than thirty days leads to confusion in the planning

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process and delays in outage related activities, which ultimately results in outages of longer than scheduled duration. Because of questions regarding analysis data versus plant performance data the 11 MOV rerate procedures were considered incomplete and did not meet the Thirty-Day Rule, they will be rescheduled for the next refueling outage. Therefore, we are modifying our previous commitment to modify these 11 MOVs from the rescheduled 1985 Refueling Outage to the next refueling outage (currently scheduled to begin May 1, 1987).

If you have any questions or need additional information, please contact us.

Very truly yours,



W. L. Stewart

cc: Dr. J. Nelson Grace
Regional Administrator
Region II

Mr. Leon Engle
NRC North Anna Project Manager

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