

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.: 85-723  
E&C/RRC:psj2006N  
Docket No.: 50-338  
License No.: NPF-4

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
NORTH ANNA POWER STATION UNIT 1  
REVISED REQUEST FOR SCHEDULAR  
EXEMPTION REGARDING CERTAIN  
APPENDIX "R" MODIFICATIONS

Virginia Electric and Power Company is working to complete the modifications necessary to upgrade the level of fire protection at our nuclear stations consistent with that required by 10 CFR 50 Appendix R. Since we last met with you on July 3, 1984, to advise you of the status of our fire protection program at North Anna, we have completed the major portion of the Appendix R effort we committed to do on the schedules we have identified to you. Modifications have since been completed involving emergency lighting and emergency communications, installation of containment cable tray covers, installation of fire damper access panels, sealing of charging pump cubicle penetrations, installation of additional smoke detectors, upgrade of the auxiliary building sprinkler system, installation of RHR pump heat shields, additional instrumentation (pressurizer level indication, RCS pressure wide range indication, RCS system hot leg temperature wide range indication), fire damper upgrades and diesel generator control circuit isolation. A few modifications remain to be completed, primarily associated with spurious operations.

On September 14, 1984 (Vepco letter Serial No. 431A), we requested a schedular exemption pursuant to 10 CFR 50.12 (a) regarding certain of these remaining modifications. In that letter, we had requested that our implementation schedule for these modifications, based on the provisions of 10 CFR 50.48 (c) (4), be extended from the 1984 refueling outage to the next refueling outage.

At the time of our request, 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

8510280372 851021  
PDR ADDCK 05000338  
F PDR

A006  
11

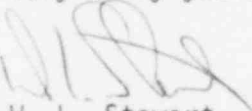
experienced substantial declines in employee productivity and efficiency. In addition, two closely scheduled refueling outages at one station places a heavy burden on station personnel. We therefore decided to reschedule our North Anna Unit 1 outage to avoid this close succession.

This rescheduling of the outage has had an adverse impact on our ability to complete installation of the Appendix R modifications listed on the Attachment due to our Company policy known as the "Thirty-Day Rule".

Virginia Electric and Power 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 process and delays in outage related activities, which ultimately results in outages of longer than scheduled duration. Because the modifications listed on the attachment do not meet the "Thirty-Day Rule", they will be rescheduled for completion by the end of the next refueling outage. Therefore, we are modifying our September 14, 1984 scheduler exemption request to the extent that the completion dates for certain modifications in the attachment be extended from the 1985 refueling outage to the next refueling outage (currently scheduled to begin May 1, 1987). The compensatory measures previously identified will remain in place until the modifications are completed.

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

Very truly yours,



W. L. Stewart

Attachment

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

Mr. Leon Engle  
NRC North Anna Project Manager

Mr. T. E. Conlon  
NRC Region II

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

Attachment

The following modifications are identified using the nomenclature used in Vepco's North Anna 10 CFR 50 Appendix R Report, Chapter 6. A detailed description of each item is also available there.

<u>Item</u>	<u>Title</u>
I.6	Pressurizer PORV Isolation
I.7	CVCS Normal Letdown Isolation
I.8	CVCS Excess Letdown Isolation*
I.9	Reactor Vessel Head Vent and Pressurizer Vent Isolation
I.10	Main Steam System Isolation
I.11	Steam Generator PORV Isolation*

\*Item I.8 and I.11 were not included in the September 14, 1984 schedular exemption request because these items are not outage related and the corresponding 10CFR50.48 schedule had expired. However, these items are included in outage related design change packages. These items were identified in Revision 1 of the 10CFR50 Appendix "R" report along with our schedule and the associated compensatory measures which will remain in effect.