July 31, 2001

Mr. David A. Christian
Senior Vice President and
Chief Nuclear Officer
Innsbrook Technical Center-2SW
5000 Dominion Blvd.
Glen Allen, Virginia 23060-6711

SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2: REQUEST FOR ADDITIONAL INFORMATION REGARDING SECTION 3.9.4 OF THE IMPROVED TECHNICAL SPECIFICATIONS (ITS); LICENSEE IDENTIFIED BEYOND SCOPE ISSUE (TAC NOS. MB1443 AND MB1444)

Dear Mr. Christian:

The NRC staff reviewed your application dated December 11, 2000, to change the format and content of the Current Technical Specifications to be consistent with NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1, and certain generic changes to the NUREG.

On the basis of our review of the proposed changes for the licensee identified beyond scope issue, ITS Section 3.9.4, Containment Penetrations, we find that additional information identified in the enclosure is needed. VEPCO is requested to provide a response within 90 days of the date of this letter.

Sincerely,

/RA/

Stephen R. Monarque, Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-338 and 50-339

Enclosure: Request for Additional Information

cc w/encl: See next page

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Virginia Electric and Power Company

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REQUEST FOR ADDITIONAL INFORMATION
NORTH ANNA POWER STATION, UNITS 1 AND 2
IMPROVED TECHNICAL SPECIFICATIONS (ITS)
LICENSEE IDENTIFIED BEYOND SCOPE ISSUE
ITS SECTION 3.9.4, CONTAINMENT PENETRATIONS

The justification for deviations from ITS 3.9.4, "Containment Penetrations," references radiological analyses of a Fuel Handling Accident (FHA) within the containment. The justification does not provide adequate information for the staff to make its requisite safety finding. Please provide the following information, or a suitable cross-reference if the information has been previously docketed.

1. Your justification states that the FHA radiological analysis was performed with both hatches of the containment personnel lock being open. Yet later in the justification you state that control room doses will be maintained within limits by "...closing the containment purge and exhaust isolation valves..." in conjunction with operation of the control room emergency ventilation system. This later statement appears to ignore the potential releases via the open personnel air lock when the containment purge exhaust is terminated. Please explain this apparent discrepancy.

2. Please include in your response the assumptions related to the means and timing of containment isolation actuation and the timing of the completion of the isolation by the closure of the containment purge and exhaust valves.

3. With regard to the postulated control room dose, please identify the basis for assumptions of unfiltered inleakage to the control room and whether or not the assumed inleakage flow has been substantiated by suitable boundary testing.

4. In your submittal, you are requesting changes to the ITS previously negotiated under Technical Specification Task Force (TSTF) Travelers 312 and 51. In order to take advantage of TSTF-312 and TSTF-51, licensees must make the following commitments:

   a. TSTF-312:

      "...(2) commitments from the licensee to implement acceptable administrative procedures that ensure in the event of a refueling accident (even though the containment fission product control is not required to meet acceptable dose consequence) that the open airlock can and will be promptly closed following containment evacuation and the open penetration(s) can and will be promptly closed."

   b. TSTF-51:

      "...A single normal or contingency method to promptly close primary containment penetrations should be developed. Such prompt methods need not completely block the penetrations or be capable of resisting pressure."

   Describe the programs and procedures that will be used to meet these commitments. Is there a designated individual or group assigned to verify penetrations are closed? What

other duties will these individuals have? What training will they receive? What controls will be placed on cables and hoses across the equipment hatch and personnel airlock?

5. The Bases for Technical Specification 3.9.4 defines “containment closure” as all potential escape paths not accounted for by the FHA analysis are closed or capable of being closed. According to paragraph 15.4.7.2.1 of the Facility Safety Analysis Report, Rev. 36, the FHA inside containment analysis assumed that all radionuclides released from the reactor cavity are released to the environment without credit for isolation and retention in the containment. That implies that no credit was given for the closure of any containment penetration with direct access to the outside. Please identify which potential escape paths are required to be closed or capable of being closed and which are not to meet containment closure requirements.