

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

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Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 & 2
ASME SECTION XI INSERVICE INSPECTION PROGRAM
CLARIFICATION OF ALTERNATE PROVISIONS

Currently, North Anna Units 1 and 2 are in the third ten-year inspection interval, first period. Third interval relief requests for Units 1 and 2 include alternate provisions that reference current Technical Specifications Limiting Conditions for Operation and Surveillance Requirements. North Anna Power Station has recently received NRC approval of Improved Technical Specifications (ITS) which have modified, relocated, or eliminated some of these Limiting Conditions for Operation and Surveillance Requirements that were referenced in alternate provisions of several previously approved relief requests. This letter is to identify how these alternate provisions will continue to be satisfied for the relief requests.

Unit 1 Relief Requests NDE-6, NDE-7, NDE-14, SPT-1, and SPT-4 contain alternative provisions that included the performance of certain surveillance requirements associated with Reactor Coolant System (RCS) Operational Leakage as specified in the current Technical Specifications. Specifically, the Technical Specifications surveillance requirements to routinely perform an RCS inventory balance and monitor the containment particulate radioactivity were included as alternative provisions.

The ITS continue to establish limits on RCS leakage and require the performance of an RCS inventory balance, but no longer include the surveillance requirement for routinely monitoring the containment atmosphere particulate radioactivity. Although no longer required by Technical Specifications, containment atmosphere particulate and gaseous radioactivity continues to be monitored and the values recorded during operator rounds consistent with the alternate provisions of the approved relief requests. Consistent with the provisions of the recently approved ITS, the alternative provisions of the approved relief requests are being modified to permit monitoring the containment atmosphere with either the gaseous or particulate radioactivity monitor.

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Two diverse means for detecting small RCS leakage in containment are required by ITS. One method specified is containment sump level monitor and the other is containment atmosphere radioactivity monitors (gaseous or particulate). Monitoring of the RCS leak rate every 72 hours during steady state operation remains a requirement of ITS as do the limits on RCS leakage. Therefore, the alternate provisions, as modified, continue to provide a high degree of confidence that small leaks will be detected in time to allow actions to place and maintain the plant in a safe condition.

Finally, the Unit 1, third interval relief requests CS-1, CS-2 and CS-3 and Unit 2, third interval relief request CS-1 reference the current Technical Specifications requirements for snubber functional testing. In the conversion from current Technical Specifications to ITS the requirements for functional testing of snubbers have been relocated from ITS to the Technical Requirements Manual (TRM). No change to this alternate provision has been made or is presently intended other than relocation of the requirements to the TRM. Subsequent changes to the TRM are controlled by 10 CFR 50.59.

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

Very truly yours,

A handwritten signature in black ink, appearing to read 'L. N. Hartz', written in a cursive style.

L. N. Hartz
Vice President - Nuclear Engineering

Commitments made in this letter: There are no new commitments in this letter.

cc: U.S. Nuclear Regulatory Commission
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