May 19, 2005

Mr. David A. Christian
Sr. Vice President and Chief Nuclear Officer
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, Virginia 23060-6711

SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED TECHNICAL SPECIFICATION CHANGES FOR REVISED FREQUENCY FOR TADOT OF P-4 INTERLOCK (TAC NOS. MC6301 AND MC6302)

Dear Mr. Christian:

By letter dated March 1, 2005, Virginia Electric and Power Company (VEPCO) submitted a license amendment request to revise the frequency for performing the Trip Actuating Device Operational Test for the P-4 Interlock Function and add Mode 4 to Technical Specification Table 3.3.2-1. Based on its review of the March 1, 2005 submittal, the NRC staff has determined that additional information is required to complete its review.

The NRC staff's questions are provided in the Enclosure. In its March 1, 2005 submittal, VEPCO requested approval of this license amendment by October 1, 2005, to support the fall 2005 refueling outage. As such, in order to support VEPCO's requested date, the NRC staff requests a response to this request for additional information within 30 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: As stated

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REQUEST FOR ADDITIONAL INFORMATION

PROPOSED REVISION OF FREQUENCY FOR TADOT OF P-4 INTERLOCK

NORTH ANNA POWER STATION, UNITS 1 AND 2

VIRGINIA ELECTRIC AND POWER COMPANY

1. The P-4 interlock is enabled when a reactor trip breaker (RTB) and its associated bypass breaker are open. Once the P-4 interlock is enabled, automatic safety injection (SI) initiation is blocked after a time delay. This function allows operators to take manual control of SI systems after the initial phase of injection is complete. Once SI is blocked, automatic actuation of SI cannot occur until the RTBs have been manually closed. The RTB position switches provide input to the P-4 interlock.

   NUREG-1431, Rev. 3, "Standard Technical Specifications Westinghouse Plants," requires that the surveillance frequency for P-4 interlock is once per RTB cycle, every 62 days on a staggered test basis. This license amendment request (LAR) proposes to change the surveillance frequency for P-4 interlock to once every refueling cycle, every 18 months. In order for the NRC staff to approve this type of surveillance frequency change, the licensee should provide justification to demonstrate that the proposed TS change is based on either hardship (such as challenges to the protection system or increased radiation exposure to plant personnel) or on a risk-informed basis.

2. NUREG-1431, Revision 3 specifies for P-4 interlock that the applicable modes are 1, 2, and 3. This LAR proposes to add Mode 4 for this function. Additional analysis is required to support the proposed change.

3. The March 1, 2005, submittal cited that the proposed changes are consistent with the intent of the Westinghouse Owners Group Technical Specification Task Force Process TSTF-444, Rev. 1, "ESFAS Interlocks P-4, P-11, & P-12 LCO Actions and Surveillance Requirements Revisions." Since TSTF-444 has not been approved by the NRC staff, the P-4 interlock-related information contained in TSTF-444 should be submitted with this LAR.

4. The March 1, 2005, submittal cited precedents from five other plants (Wolf Creek, Byron, Braidwood, Comanche Peak, and DC Cook) that maintained their 18-month surveillance test requirement to perform the TADOT of the P-4 interlock function. The NRC staff found that these plants were licensed on that basis; therefore, these precedents cannot be considered as a precedent for a technical specification change as requested in this LAR. However, the operational experience from these plants may be able to be credited as part of a risk-informed basis.

North Anna Power Station, Units 1 & 2

cc:

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