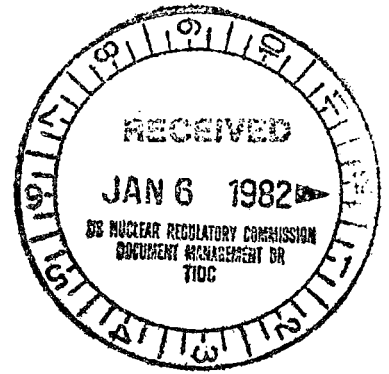


VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261



R. H. LEASBURG
VICE PRESIDENT
NUCLEAR OPERATIONS

December 31, 1981

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 708
NO/JHL:acm
Docket Nos. 50-280
50-281
50-338
50-339
License Nos. DPR-32
DPR-37
NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
EXCEPTIONS TO NUREG-0737 REQUIREMENTS

In our recent letter of December 9, 1981 (Serial No. 702), Veeco stated that it would satisfy the commitment date of January 1, 1982 for NUREG-0737 Item II.B.2 (Sections C.8 and C.9). This letter provides an explanation of our position regarding this exception to the previously submitted schedule.

The commitment of section C.8 of Item II.B.2 cannot be satisfied for North Anna Unit No. 1. The gasket material replacement for the charging pump lube oil cooler system was delayed as a result of one out of three charging pumps being out of service late in 1981. Plant Technical Specifications would allow the two remaining operable charging pumps to be individually taken out of service for the purpose of gasket material replacement; however, such action would have placed North Anna Unit No. 1 in a Technical Specification Action Statement and would have reduced the level of redundancy of a safety system. It was decided that the replacement of this gasket material was not of a sufficient safety concern to warrant the reduction of redundancy of the charging pump system. This material replacement will be complete as soon as possible after the return to service of the currently inoperable charging pump but no later than the next refueling outage which is scheduled for Spring, 1982.

The commitment of section C.9 of Item II.B.2 cannot be satisfied for Surry Unit No. 2. Vent and drain containment isolation valve modifications can not be fully implemented due to material procurement problems. These modifications call for the replacement of a drain valve (2-DG-74) and replacement of the teflon seats and seals in two containment isolation valves (TV-VG-209A&B). The drain valve has been replaced but the isolation valves have not been reworked. It is anticipated that materials for the valve rework will be available prior to the next scheduled Unit 2 outage (currently planned for May, 1982). Valve rework will be completed during that outage.

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Certain areas of the Technical Specifications will not be able to be revised to meet certain January 1, 1982 commitments for NUREG-0737 requirements. Among the areas that we will not be able to meet for the January 1, 1982 Technical Specifications commitment date are Sections: II.B.1 Reactor Coolant System Vents, II.B.3 Modifications on Post-Accident Sampling, II.F.1 Accident Monitoring and II.F.2 Installation of Instrumentation for Detection of Inadequate Core Cooling. These Technical Specification revisions will be requested by July 1, 1982. This delay will permit us to coordinate the installation of systems with Technical Specification preparation and the development of model Technical Specifications by the NRC.

If there are any questions regarding this information, please contact this office.

Very truly yours,

R. H. Leasburg
R. H. Leasburg

cc: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing