

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

R. H. LEASBURG  
VICE PRESIDENT  
NUCLEAR OPERATIONS

July 13, 1982

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. 367A  
NO/DWL: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  
NUREG-0737 RESPONSE-REVISION 3 CORRECTIONS

In our letter dated June 28, 1982 (Serial No. 367) Vepco supplied Revision 3 to our document entitled "Response to NUREG-0737 Post-TMI Requirements." Several pages of this revision were inadvertently deleted in some copies of the June 28, 1982 submittal due to a duplication oversight. These pages (D-7 through D-10) are attached. Additionally, pages I.C.5-3 and II.K.3.25-3 are also attached. Page I.C.5-3 corrects a typing error and page II.K.3.25-3 provides a clarification of a previously ambiguous statement.

Please incorporate these corrections into your Revision 3 change pages which were previously provided.

Very truly yours,

  
R. H. Leasburg

A046

CORRECTIONS TO REVISION 3  
"RESPONSE TO NUREG - 0737"

<u>Clarification Item</u>	<u>Shortened Title</u>	<u>Description</u>	<u>Implementation Schedule</u>	<u>NRC Pre-Implementation Approval</u>	<u>NRC Post-Implementation Review Required</u>	<u>Tech Spec. Revision Required</u>	<u>Submission Req. By</u>	<u>Vepco Remarks</u>
II.F.1	Accident-monitoring (continued)	2. Iodine/particulate sampling	1-1-82 E	No	Yes	Yes	1-1-81 submission if deviation from position	Submitted-A
		3. Containment high-range monitor	1-1-82 E	No	Yes	Yes	7-1-81 submission if deviation from position	Submitted-A
		4. Containment pressure	1-1-82	No	Yes	Yes	1-1-82	Submitted-A
		5. Containment water level	1-1-82	No	Yes	Yes	1-1-82	Submitted-A
		6. Containment hydrogen	1-1-82 E	No	Yes	Yes	1-1-82	Submitted-A
II.F.2	Instrumentation for detection of inadequate core cooling	1. Subcool meter	1-1-80	No	Yes	Yes	1-1-80	Closed-A(1,2,8)
		2. Tech spec (LL Cat A)	12-15-80	Yes	No	Yes	9-1-80	Closed-A(4,5,6)
		3. Install level instruments (LL Cat B)	1-1-82 E	No	Yes	Yes	1-1-81 Submission if deviation from position	Submitted-A
II.G.1	Power supplies for pressurizer relief valves, block valves and level indicators	1. Upgrade to emerg sources	1-1-80	No	Yes	Yes	1-1-80	Closed-A(1,2,8)
		2. Tech specs	12-15-80	Yes	No	Yes	9-1-80	Closed-A(4,5,6)
II.K.1	IE Bulletins	79-05, 06, 08	Bulletin specific	No	Yes	No	Bulletin specific	NRR has evaluated Vepco responses-A

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II.K.2	Orders on B&W plants	13. Thermal mechanical report	1-1-82	No	Yes	As required	1-1-82	Submitted-A	
		17. Voiding in RCS	b. 1-1-82	No	Yes	No	1-1-82	Submitted-A	
II.K.3	Final recommendations, B&O task force	1. Auto PORV isolation						Not required by II.K.3.2-A	
		2. Report on PORV failures	1-1-81	No	Yes	No	1-1-81	Submitted-A	
		3. Reporting SV & RV failures & challenges	1-1-81	No	Yes	Yes	1-1-81	Closed-A(15,16)	
		5. Auto trip of RCPs							
		a. Propose modifications	7-1-81 E	No	Yes	No	2-15-81	Submitted-A	
		b. Modify	3-1-82	Yes	No	Yes	7-1-81 E	If required-A	
		9. PID controller	1-1-81	No	Yes	No	12-1-80	Closed-A(13,17)	
		10. Proposed anticipatory trip modifications	Plant specific	Yes	No	Yes	Plant specific	Not Applicable-A	
		11. Justify use of certain PORV	Plant specific	No	Yes	No	Plant specific	Not Applicable-A	
		12. Anticipatory trip on turbine trip							
		a. Confirmation or propose modifications	1-1-81	No	Yes	No	1-1-81	Closed-A(13,17)	
		b. Modify	1st refuel 6 mo after staff approval	Yes	No	Yes	1st refuel	Not Applicable-A	
		17. ECC system outages	1-1-81	No	Yes	As required	1-1-81	Submitted-A	
		25. Power on pump seals							
		a. Propose mods	1-1-82	No	Yes	No	1-1-82	Submitted-A	
		b. Modifications	7-1-82	Yes	No	No	7-1-82	None Required-A	

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II.K.3	Final recommendations, B&O task force (continued)	30. SB LOCA methods						
		a. Schedule outline	11-15-80	No	Yes	No	11-15-80	Submitted-A
b. Model	1-1-82 E	Yes	No	No	1-1-82 E			
c. New analyses	1-1-83 or 1 yr after staff approval	Yes	No	No	1-1-83 or 1 yr after staff approval			
		31. Compliance with CFR 50.46	1-1-83 or 1 yr after staff approval	Yes	No	TBD	1-1-83	
III.A.1.1	Emergency preparedness, short-term	Short-term improvements	Complete	No	Yes	No	Complete	Complete-S, Closed-NA(18)
III.A.1.2	Upgrade emergency support facilities	1. Interim TSC OSC & EOF	Complete	No	Yes	No	Complete	Closed-A(1,2,8) Submitted-A
		2. Design	6-1-81	Yes	No	No	6-1-81	
		3. Modifications	10-1-82 E	No	Yes	Yes	10-1-82	
III.A.2	Emergency preparedness	1. Upgrade emergency plans to App. E, 10 CFR 50	4-1-81	No	Yes	Yes	1-2-81	Submitted-A
		2. Meteorological data	6-1-83	No	Yes	Yes	1-2-81	Staged implementation (E)-A
III.D.1.1	Primary coolant outside containment	1. Leak reduction	Complete	No	Yes	Yes	Complete	Closed-A(1,2,3) Closed-A(4,5,6)
		2. Tech specs	12-15-80	Yes	No	Yes	9-1-80	
III.D.3.3	Inplant radiation monitoring	1. Provide means to determine presence of radioiodine	Complete	No	Yes	No	Complete	Closed-A(1,2,3)

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III.D.3.3	Inplant radiation monitoring (continued)	2. Modifications to accurately measure I <sub>2</sub>	1-1-81	No	Yes	Yes	1-1-81	Closed-A(1,2,3)
III.D.3.4	Control-room habitability	1. Review	1-1-81	No	Yes	No	1-1-81	Submitted-S, Closed-NA(3) Not Required-NA
		2. Modification	1-1-83	No	Yes	Yes	1-1-81	

Notes

E - Indicates those implementation and/or submittal dates to which Vepco has taken an exception.

Closed - Indicates that actions and/or requirements were met and are documented as so.

Submitted - Indicates that information was provided stating completion of requirements but no formal Close-out was received.

Complete - Indicates that requirements were met but no submittal was required.

S - Surry Power Station (both units)

NA - North Anna Power Station (both units)

A - All units

(Ref. No.) - Close-out documentation reference (see reference listing)

I.C.5 PROCEDURES FOR FEEDBACK OF OPERATING EXPERIENCE TO PLANT STAFF

The operating experience assessment function has been implemented through both a system-level Safety Evaluation and Control group and Safety Engineering staffs at each station. Procedures for the operation of the system organization, the North Anna SES and the Surry SES were in effect prior to January 1, 1981.

Part of the operating experience assessment function is accomplished through the use of the INPO SEE-IN Program. This program was endorsed by the NRC Staff in Generic letter 82-04. This program has been part of the Vepco Safety Evaluation and Control Staff procedures since Fall 1980.

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II.K.3.25 EFFECT OF LOSS OF ALTERNATING-CURRENT POWER ON PUMP SEALS

This item requires that the consequences of a loss of reactor coolant pump (RCP) seal cooling due to a loss of AC power (defined as loss of offsite power) for at least 2 hours be demonstrated. During normal operation, seal injection flow from the chemical and volume control system is provided to cool the RCP seals and the component cooling water system provides flow to the thermal barrier heat exchanger to limit the heat transfer from the reactor coolant to the RCP internals. In the event of loss of offsite power, the RCP motor is deenergized and both of these cooling supplies are terminated; however, the diesel generators are automatically started and seal injection flow is automatically restored within seconds. Component cooling water to the thermal barrier heat exchanger is also automatically restored at North Anna, but must be manually reinitiated at Surry. Either of these cooling supplies is adequate to provide seal cooling and prevent seal failure due to loss of seal cooling during a loss of offsite power for at least 2 hours.

This information was provided on December 28, 1981 (Serial No. 702).