

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

December 28, 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. 713
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 TECHNICAL SPECIFICATION REQUIREMENTS OF NUREG-0737

Veeco will submit the Technical Specifications pertinent to the following NUREG-0737 items/systems by April 1, 1983, Items: II.F.1.1 - Noble Gas Effluent Monitors, II.F.1.3 - Containment High-Range Radiation Monitors, II.F.1.4 - Containment Pressure Monitors, II.F.1.5 Containment Water Level Monitor and II.F.1.6 - Containment Hydrogen Monitors. In addition, Technical Specifications for Items II.B.1 - Reactor Coolant System Vents and II.F.2 - Installation of Instrumentation for Detection of Inadequate Core Cooling will be submitted by April 1, 1983. The Reactor Vessel Level Indication System (Item II.F.2) has been installed and calibrated but it also requires a post-implementation review by the NRC Staff. The Reactor Coolant System Vents (Item II.B.2) are also installed and they also require post-implementation review but they are dependent on the NRC Staff approval of the Reactor Vessel Level Indication System (Item II.F.2). Veeco will prepare Technical Specifications for the above systems using the guidance of the existing Technical Specifications for similar and/or related systems or sample Technical Specifications if available.

Currently, NUREG-0737 states that Technical Specifications will be required for Items II.B.3 - Post-Accident Sampling and II.F.1.2 - Sampling and Analysis of Plant Effluents. A review of 10 CFR 50.36(B)(2) has been performed and it states that, "a limiting condition for operation is the lowest functional capability or performance level of equipment required for the safe operation of the facility." With this definition it has been determined that NUREG-0737, Items II.B.3 - Post-Accident Sampling and II.F.1.2 - Sampling and Analysis of Plant Effluents do not require Technical Specification changes. These systems are not used in conjunction with the safe operation of the facility nor do they provide operator guidance in the event of an accident. These systems are only used for information purposes in the event of an accident.

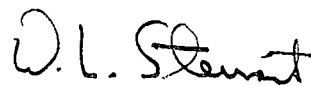
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VIRGINIA ELECTRIC AND POWER COMPANY TO Harold R. Denton

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

Very truly yours,


W. L. Stewart

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

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