

February 15, 1985



VIRGINIA POWER

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. H. L. Thompson, Jr. Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 85-090
NO/DWS:acm
Docket Nos. 50-280
50-281
50-338
50-339
License Nos. DPR-32
DPR-38
NPF-4
NPF-7

Gentlemen:

VIRGINIA POWER
NORTH ANNA UNITS 1 AND 2
SURRY UNITS 1 AND 2
RESPONSE TO GENERIC LETTER 83-28
REQUEST FOR ADDITIONAL INFORMATION
ITEM 4.2.1 and 4.2.2

Your letters of November 23, 1984 for North Anna and November 16, 1984 for Surry, requested additional information with regard to Generic Letter 83-28, items 4.2.1 and 4.2.2. This information is provided below:

Item 4.2.1

The preventive maintenance procedure for the DB-50 reactor trip breakers for both Surry 1 and 2 and North Anna 1 and 2 is patterned after the recommended maintenance activities of the Westinghouse program of October 14, 1983. Format and content are not identical to the standard program, but are similar and for all practical purposes our procedures provide comparable methods for the activities recommended. Procedural inspection activities of the October 14, 1983 Westinghouse Program are presently performed on a six month basis at both North Anna and Surry. The twenty items identified by the request are performed by our procedures.

Item 4.2.2

Procedures utilized for both North Anna and Surry include instructions for measurement of the undervoltage trip attachment dropout voltage parameter; the trip force parameter; and the breaker response time for undervoltage trip parameter. These test parameters are used to determine acceptable performance of the breaker.

Currently, our procedures do not include the measurement of the breaker insulation resistance, a previously unidentified parameter. Although the October 14, 1983 Westinghouse procedure does not include such a

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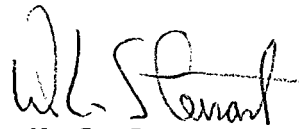
measurement, it is our plan to include this measurement in our procedures. It is our opinion and one also held by Westinghouse that trending of this parameter can produce misleading results. Changing conditions, which are of little significance such as ambient temperature and humidity fluctuation can vary the results and make trending ambiguous. We do, however, plan to keep a record of the test results and review it to assure resistance values are maintained within uniform industry standards. Necessary procedural changes are planned for completion by April 1, 1985.

Test parameters are measured by maintenance personnel at each preventive maintenance inspection interval. Administrative control of this testing activity and its results are handled by Periodic Test procedures. Test parameters must be within the acceptance criteria in order for the breaker performance to be satisfactory. Unsatisfactory measurements require corrective action.

Completed test results are reviewed and analyzed by the station engineering staff at each inspection interval (currently scheduled six months).

The review and analysis consist of observing and recording specific test results and assuring these results meet the Westinghouse standard procedure limits. Measured parameter information obtained from the periodic test is used by engineering personnel to recommend adjustments of the inspection interval or corrective action as appropriate.

Very truly yours,


W. L. Stewart



cc: Dr. J. Nelson Grace
Regional Administrator
Region II

Mr. M. W. Branch
NRC Resident Inspector
North Anna Power Station

Mr. D. J. Burke
NRC Resident Inspector
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Mr. Steven A. Varga
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