

July 3, 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. 85-268
NO/TAH:acm
Docket Nos. 50-280
50-281
50-338
50-339
License Nos. DPR-32
DPR-37
NPF-4
NPF-7

Gentlemen:

VIRGINIA POWER
SURRY POWER STATION
NORTH ANNA POWER STATION
CONTROL ROOM DESIGN REVIEW
REQUEST FOR SCHEDULE EXTENSION

In our Control Room Design Review (CRDR) Program Plan, dated March 1, 1984, Serial No. 087, we committed to the delivery of the CRDR Final Summary Report by August 31, 1985. This date was identified in the NRC orders confirming our commitments for the Emergency Response Facilities dated June 12, 1984 for Surry Power Station and June 14, 1984 for North Anna. The Confirmatory Orders contain a provision allowing the Director, Division of Licensing, to grant extensions of time for completing the items listed in the Orders "for good cause shown". Based upon the rate of completion experienced to date and the balance of work remaining, we will be unable to meet the commitment date and must request a schedule extension.

The principal factors for this request are provided below:

1. A significantly greater than anticipated number of Human Engineering Deficiencies (HEDs) have been identified as a result of the Operations Experience Review (OER) phase of the CRDR. This is due to expansion of the OER scope by inclusion of additional personnel beyond licensed operators (i.e. to include shift technical advisors, training personnel and management), the "open-ended" nature of the questionnaires, and the format of the followup interviews. These HEDs are based on personal comments and tend to be subjective. Therefore, they are difficult to assess and require more indepth, individual consideration than HEDs that are derived from a strict

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"standards based" survey approach.

To achieve commonality, the corrective actions identified must be integrated into each station's two units and wherever practicable between the stations themselves. This is time consuming since the control rooms at each station are not identical. Thus, all proposed corrective actions must be carefully evaluated for applicability to each control room.

As previously recognized by the NRC during the in-process audit at the Surry Power Station, our CRDR program is comprehensive and technically sound but very ambitious in schedule. We now recognize that completing the assessment and identification of corrective actions associated with the HEDS cannot be completed until October 1985.

2. As a part of the integration of the Emergency Response Facilities projects, the CRDR process has been coordinated with the revision of Emergency Operating Procedures (EOPs) based on Revision 1 of the Westinghouse Owner's Group Emergency Response Guidelines (WOG ERGs). Operator retraining will be based on these revised EOPS. There are two events which could significantly impact the final development of the WOG ERG based EOPS. These are the issuance of the NRC Safety Evaluation Report (SER) for Revision 1 of the WOG ERGs and the resolution of items identified by the WOG Verification and Validation (V&V) program for the Rev. 1 ERGs.

In order to finalize the CRDR effort and to minimize the impact on operator training, it is desirable to include these potential inputs in the EOP procedure development process and the CRDR program prior to EOP procedure implementation and the submittal of the CRDR Final Summary Report. This is necessary to reduce the probability of instituting additional major procedure changes and to eliminate the resultant retraining.


We believe that the anticipated early 1986 issuance of the WOG responses to the SER and V&V program findings warrant a reconsideration of the CRDR Final Summary Report submittal schedule.

Delay in submittal of the final report is necessary to complete assessment of identified HEDS. Delay in submittal of the final report is also

desirable from a human factors consideration to coordinate the CRDR process with related WOG Emergency Response Facilities projects.

For these reasons, we request an extension for the submittal of the CRDR Final Summary Report until August 29, 1986. If you have any questions on this request, please contact us.

Very truly yours,


W. L. Stewart

cc: Dr. J. Nelson Grace
Regional Administrator
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North Anna Power Station

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