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## VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

September 11, 1979

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. O. D. Parr, Chief
Light Water Reactors Branch No. 3
Division of Project Management
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Serial No. 740 LQA/ESG:pwc

Docket No. 50-338 License No. NPF-4

Dear Mr. Denton:

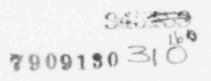
## AMENDMENT TO OPERATING LICENSE NORTH ANNA POWER STATION UNIT NO. 1

Pursuant to 10CFR50.90, the Virginia Electric and Power Company hereby requests an amendment to Operating License NPF-4 for the North Anna Power Station, Unit No. 1. The requested amendment is enclosed.

As has been discussed with the Staff on September 10 and 11, 1979, it has become necessary to extend operation of Unit 1 beyond the September 15, 1979 refueling date originally anticipated. Accordingly, we request that License Condition 2.D(3)p be revised to permit the refueling outage to begin no later than October 5, 1979.

Our original application for a license amendment to defer certain Technical Specification surveillance requirements to the refueling outage (dated March 13, 1979, and supplemented by letters dated July 23 and July 31, 1979), noted that deferral of a few surveillance requirements for several weeks would have no significant effect on the ability of the systems to respond and perform under accident conditions. In its Safety Evaluation for Amendment No. 13, the Staff agreed with this conclusion. Based on our anticipated refueling schedule, the Staff specified that the outage begin no later than September 15, 1979. We now request that this be extended to October 5.

Two groups of surveillance requirements are involved in this extension request: Reactor Protection and Engineered Safety Features (ESF) response time testing, and Safety Injection (SI) and Containment Depressurization Actuation (CDA) testing. As our previous letters indicated, both trains and all channels of protection and ESF functions were checked during preoperational testing and found to have response times in tolerance with a margin of 10 to 40 percent. We have also agreed to perform additional response time testing during the upcoming outage, as noted in the Staff's Safety Evaluation for Amendment No. 13. Based on the preoperational test results, and the additional testing to be performed, the short additional delay requested should not result in any significant effect on the ability of the equipment to perform satisfactorily.





The SI and CDA testing involves cycling of valves and pumps in response to test signals. Each of these valves and pumps responded satisfactorily to test signals during pre-operational testing. In accordance with Technical Specification 4.0.5, many of the valves and all of the pumps involved are functionally tested on a frequency greater than 18 months to assure operability. In addition, the reactor trip and ESF actuation system logic is tested monthly in accordance with Specifications 4.3.1.1.1 and 4.3.2.1.1. Based on these tests, the Staff concluded in its Safety Evaluation that deferrals of these tests would be reasonable. This conclusion continues to be supported on the basis of testing conducted since Amendment 13 was issued.

This request has been approved by the Station Nuclear Safety and Operating Committee and the System Nuclear Safety and Operating Committee. It has been determined that this request does not involve an unreviewed safety question.

Based on the test results previously obtained, the additional testing to be performed during the outage, and the short additional delay being requested, the Staff should be able to conclude that this request does not involve a significant hazards consideration, and is acceptable. Therefore, we have determined that this request is in Class III per 10CFR170.22, and a check in the amount of \$4,000.00 is enclosed in payment of the amendment fee.

Your prompt approval of this request will be greatly appreciated.

Very truly yours,

To.M. Stalling.

C. M. Stallings Vice President-Power Supply and Production Operations

Enclosures

cc: Mr. James P. O'Reilly, Director Office of Inspection and Enforcement Region II COMMONWEALTH OF VIRGINIA )
S. S.

Before me, a Notary Public, in and for the City and Common-wealth aforesaid, today personally appeared C. M. Stallings, who being duly sworn, made oath and said (1) that he is Vice President-Power Supply and Production Operations, of the Virginia Electric and Power Company, (2) that he is duly authorized to execute and file the foregoing Amendment in behalf of that Company, and (3) that the statements in the Amendment are true to the best of his knowledge and belief.

SEPTEMBER , 1979.

My Commission expires APRIL 11 14

Notary Public

(SEAL)

## ENCLOSURE

## REQUESTED REVISION TO LICENSE CONDITION

2.D(3)p. The end of the current surveillance period for the Surveillance Requirements listed below may be extended beyond the time limit specified by Technical Specification 4.0.2.a. In each case, the required surveillance shall be completed by the revised due date. Upon accomplishment of the surveillance, the provisions of Technical Specification 4.0.2.a shall apply.

(1) Specifications: 4.3.1.1.3 4.3.2.1.3 4.6.2.1.c 4.6.2.2.1.c 4.6.2.3.c 4.6.3.1.2.a 4.6.3.1.2.b 4.7.4.1.d.2 4.7.8.1.d.2

Revised due date: Prior to startup after first refueling outage which will begin no later than October 5, 1979.

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