## VIRGINIA ELECTRIC AND POWER COMPANY Richmond, Virginia 23261

September 13, 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. 746 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 TECHNICAL SPECIFICATION CHANGE NO. 22

Pursuant to 10CFR50.90, the Virginia Electric and Power Company requests an amendment, in the form of revisions to the Technical Specifications, to Operating License NPF-4 for the North Anna Power Station Unit No. 1. The requested revisions are enclosed and have been designated as Change No. 22.

As the NRC was informed on September 11, 1979, the current Technical Specification limits for Refueling Water Storage Tank (RWST) level are incorrect, in that they require "contained" water volumes inconsistent with the safety analyses described in the FSAR. This error apparently occurred at the time the specifications were being prepared and approved; the values listed were the necessary "usable" volumes rather than the "contained" volumes called for by the specification. This requested change will correct these values to be consistent with the analyses described in our report on the final NPSH modifications (letter Serial No. 207, April 14, 1978), and the FSAR.

For Technical Specifications 3.1.2.8 and 3.5.5, the RWST low volume limit has been set at 475,058 gallons. This volume is consistent with the low level alarm shown on FSAR figure 6.3-9 and Fig. 2.1-1 of our April 14, 1978 letter, and ensures that the number of gallons assumed usable in the analyses (see FSAR Table 6.2-40) are available, after making conservative allowances for minimum submergence of the quench spray suction lines. The high volume limit has been set at 487,000 gallons. This value ensures that the RWST level remains below the bend line of the tank. Both of these volumes are bounded by volumes assumed in the analyses for containment post-LOCA pH control, as reported in our response to IE Bulletin 77-04 (letter Serial No. 261, dated May 16, 1978).

The minimum contained water volume for Technical Specification 3.1.2.7 has been established at 51,000 gallons, in order to ensure that 9690 gallons are usable for a backup source of borated water in Modes 5 and 6. This minimum contained volume has been established taking into account the elevation of the safety injection suction line, and a conservative allowance for required submergence.

7909180 23

VIRGINIA ELECTRIC AND POWER COMPANY TO

This change has been reviewed and 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, as defined in 10CFR50.59.

Since the level in the RWST has been reduced to comply with the existing specification, a period of time will be necessary to restore the level to the revised minimum when the change is approved. We request, therefore, that the revised specification be made effective 48 hours from receipt of the amendment, to allow time for the tank level to be restored.

We have evaluated this request in accordance with the criteria in 10CFR170.22. Since the request simply involves the correction of values to be consistent with previously submitted and approved analyses, the Staff should be able to conclude that it does not involve a significant hazards consideration, and is acceptable. Therefore, we have classified this request Class III, and a check for \$4,000.00 is enclosed in payment of the amendment fee.

Your prompt review and approval of this change will be greatly appreciated. Please contact us should you require additional information.

Very truly yours,

Ze.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

CITY OF RICHMOND

Before me, a Notary Public, in and for the City and Commonwealth 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.

) s. s.

Given under my hand and notarial seal this 13th day of September, 1979.

My Commission expires January 20, 1981 .

Robert M. Neil

(SEAL)