



VIRGINIA ELECTRIC AND POWER COMPANY, RICHMOND, VIRGINIA 23261

November 9, 1979

Mr. James P. O'Reilly, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 552F/070279
PSE&C/CGC:mac:wang

Docket Nos. 50-338
50-339

Dear Mr. O'Reilly:

Our letter to you of October 30, 1979 (S.N. 552D/070279) concerning I.E. Bulletin 79-14 indicated that our target dates for completing our valve and operator weight verification program are December 21, 1979 for Unit 1 and January 31, 1980 for Unit 2. It now appears that these dates will slip due to another problem which we have identified and reported to you on November 5, 1979 by 10CFR50.55(e), Part 21, and License Event Report concerning amplified response spectrum (ARS) curves applied in some pipe stress analyses for safety related systems. At present, we do not have a revised schedule for completing Bulletin 79-14 for Units 1 and 2.

In our review of Bulletin 79-14, we first identify valve assemblies with weights discrepant from that used in the pipe stress analyses. We then perform an evaluation to determine if the discrepancy causes design or code allowables to be exceeded; if so, a nonconformance will be identified. This method of evaluation and subsequent reporting may become very complicated in light of the problem with the ARS curves. When we evaluate a system having a discrepant valve weight and the ARS problem, it is difficult to determine if one problem or the combined effect of both problems, will cause us to exceed the allowable, if it is exceeded. Therefore, to determine if we have a nonconformance under Bulletin 79-14, we would have to evaluate the system using the correct valve weight and the old ARS curve; this would only create an additional work load that is unjustifiable.

In order to proceed in a logical manner, our approach will be to work Bulletin 79-14 and the ARS curve problem concurrently. Those areas requiring evaluation only for discrepant valve weights will be handled as before under the Bulletin, and unacceptable results will be identified as nonconformances. However, those areas requiring evaluation for both problems will be done using correct valve weights and ARS curves; if an allowable is exceeded, the necessary modifications will be made and reported in the final 10CFR50.55(e) or LER report; however, action under I.E. Bulletin 79-14 will be limited to reporting such cases in the final Bulletin report. In this way, we hope to avoid excessive duplication of reporting and unnecessary expense of manpower to distinguish between Bulletin 79-14 and ARS curve related problems.

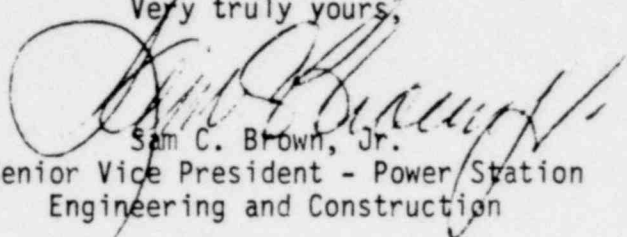
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If you have any questions, please contact this office.

Very truly yours,


Sam C. Brown, Jr.
Senior Vice President - Power Station
Engineering and Construction

cc: Mr. Victor Stello, Director
Office of Inspection & Enforcement

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation

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