

January 19, 1979

UNITED STATES OF AMERICA  
 NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of	)	
	)	
VIRGINIA ELECTRIC AND POWER COMPANY	)	Docket Nos. 50-338 OL
	)	50-339 OL
(North Anna Nuclear Power	)	
Station, Units 1 & 2)	)	

VEPCO'S RESPONSE TO NRC STAFF  
 EVALUATION OF PUMPHOUSE SETTLEMENT

In its order of December 29, 1978, the Appeal Board allowed the parties until January 19, 1979, to respond to the NRC staff's evaluation of the settlement of the service water pumphouse at North Anna. Vepco has reviewed the corrected copy of the staff's evaluation, dated January 9, 1979, and this is our response to that analysis.

Vepco believes that the Staff has been somewhat over-conservative and that a maximum allowable average service water pumphouse settlement of 0.33 feet, as Vepco requested in its letter of June 13, 1978 (see the staff's analysis at 2), would be fully consistent with protecting the public health and safety. Nevertheless, Vepco can comply with the staff's position, as represented by its January 9, 1979, analysis and technical specifica-

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tions, with one minor exception.

The exception is this: section 4.7.13.1 of the proposed technical specifications (part of the "surveillance requirements") is, strictly speaking, impossible to comply with. It imposes a new requirement that groundwater flow rates be measured monthly and appears to make the requirement retroactive:

4.7.13.1 The groundwater level of the service water reservoir shall be determined to be within the limits by piezometer readings from at least 7 of the locations shown on Table 3.7-6. The groundwater flow rates shall be determined by measurements at the drain outlet gallery. Readings shall be taken at least once per 31 days for 5 years following the date of issuance of the Operating License. The need for further surveillance will be determined at the end of the 5 year period. [emphasis added].

The operating license for North Anna Unit 1 was issued November 26, 1977, and it isn't possible to make the newly required readings starting with that date.

Veeco suggests the following revision:

4.7.13.1 The groundwater level of the service water reservoir shall be determined to be within the limits by piezometer readings from at least 7 of the locations shown on Table 3.7-6. Readings shall be taken at least once per 31 days for 5 years following the date of issuance of the Operating License. The groundwater flow rates shall be determined by measurements at the drain outlet gallery. Readings shall be taken at least once per 31 days from the date of issuance of this revision. The need for further surveillance will be determined at the end of the 5 year period from the date of issuance of the Operating License.

Respectfully submitted,  
VIRGINIA ELECTRIC AND POWER COMPANY

By /s/ James N. Christman  
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DATED: January 19, 1979

CERTIFICATE OF SERVICE

I certify that I have served a copy of Vepco's Response to NRC Staff's Analysis of SWPH Settlement on each of the persons named below by first-class mail:

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DATED: January 19, 1979