

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 28, 1980

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. B. Joe Youngblood, Chief
Licensing Branch 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 662
NO/RMT:ms
Docket No. 50-339
License No. NPF-7

Dear Mr. Denton:

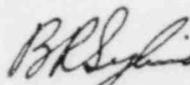
In our letter to you dated July 24, 1980 on our North Anna Unit 2 NUREG 0538 review, we stated that we do not have test data on a group of items (48) to verify qualification to the required level. Even though it will be November 1, 1980 before final verification of all items can be made, we feel it is safe to start-up and operate North Anna Unit 2 at power. We have confidence that these items will perform their intended functions under accident conditions pending completion of the ongoing qualification review for the following reasons:

- 1) We have no reason to believe that any item does not meet the environmental qualification criteria.
- 2) The conditions for which we feel these items are qualified are much more severe than the actual conditions under an accident situation. For example, the time equipment must operate under test conditions is much greater than the time it would need to operate under actual accident conditions. Also, parameters are enveloped for test conditions and this would be unrealistic for any specific accident situation.
- 3) The equipment at North Anna Unit 2 is new and has not been exposed to a normal operating environment including radiation. Since the plant must undergo a power ascension test program, equipment will be exposed to a relatively few effective full power days prior to November 1, 1980.

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Based on the above reasons, we request that North Anna Unit 2 be granted a full power license and placed in the operating plants category.

Very truly yours,



B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

cc: Mr. James P. O'Reilly