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Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attn: Mr. R. L. Tedesco  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Serial No. 220  
PSE&C/WBR:btw

Docket No. 50-404

Dear Mr. Denton:

10CFR50.54 REQUEST REGARDING THE DESIGN ADEQUACY OF  
THE B&W NSSS UTILIZING THE OTSG'S

The NRC letter of October 25, 1979, forwarded a 10CFR50.54 request for information pertaining to overcooling transients, the sensitivity of the B&W OTSG design, and the construction schedules for North Anna Units 3 and 4. Our initial response (letter dated November 27, 1979, Serial No. 890/102579) stated that construction had already been reduced to a caretaker status pending a study of the feasibility of utilizing the existing North Anna 3 and 4 equipment in the design and construction of coal units. Since a decision has been made to continue with the construction of Unit 3 as a nuclear unit, the purpose of this letter is to address the 10CFR50.54 request in light of our plans to resume limited construction in June 1981.

As discussed in our meeting with Mr. D. Eisenhut, et al, on March 23, 1981, our 1981 construction activity will consist of: rock anchor, caissons and caisson retaining wall installation and excavation for Recirculation Spray Pumps (RSP) and the installation of the RSP liners. Since none of these construction activities involve structures or systems potentially affected by the "Sensitivity" issue, we would plan to complete this limited construction effort, prior to fully addressing the "Sensitivity" issue. In the meantime, Vepco has initiated a Design Evaluation Review aimed at identifying the best overall modifications to make in light of current regulatory requirements, the TMI-2 incident, the "Sensitivity" issue, and other licensing issues such as ATWS. The results of this evaluation, along with the analyses requested by the NRC in the October 25, 1979 letter, will be provided to the NRC in 1982, prior to any construction activities on systems potentially affected by the "Sensitivity" issue.

Due to the nature of construction activities contemplated over the next couple of years, we trust that this interim response is satisfactory.

Very truly yours,

W. C. Spencer  
Vice President - Power Station  
Engineering and Construction Services

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