

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261



September 11, 1981

R. H. LEASBURG
VICE PRESIDENT
NUCLEAR OPERATIONS

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 521
NO/WRM:acm
Docket No. 50-339
License No. NPF-7

Gentlemen:

AMENDMENT TO OPERATING LICENSE NPF-7
NORTH ANNA POWER STATION UNIT NO. 2

Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests an amendment to Operating License NPF-7 for North Anna Power Station Unit No. 2. The proposed change to the Operating License is enclosed.

Paragraph 2.C.(15).(b) of the North Anna Unit 2 Operating License requires that Vepco install inspection ports in the steam generators prior to resuming operation following the first refueling outage. The proposed change to the Operating License is to delete this requirement for the installation of steam generator inspection ports. The basis for the proposed change is provided in Attachment 1.

This request has been reviewed by the Station Nuclear Safety and Operating Committee and by the Safety Evaluation and Control staff. It has been determined that this request does not pose an unreviewed safety question.

We have evaluated this request in accordance with the criteria in 10 CFR 170.22. Since this request involves a single safety issue which the Staff should be able to determine does not pose a significant hazards consideration, a Class III license amendment fee is required. Accordingly, a voucher check in the amount of \$4,000.00 is enclosed in payment of the required fee.

Very truly yours,

R. H. Leasburg

Attachments:

1. Discussion of Proposed Operating License Change
2. Voucher Check No. 43079 for \$4,000.00

cc: Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
Region II

Handwritten: w/check \$4,000
A001
5/1

COMMONWEALTH OF VIRGINIA)
)
CITY OF RICHMOND)

The foregoing document was acknowledged before me, in and for the City and Commonwealth aforesaid, today by R. H. Leasburg, who is Vice President-Nuclear Operations, of the Virginia Electric and Power Company. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 17th day of Sept., 19 81.

My Commission expires: 2-26, 19 85.

Ann C. McRee
Notary Public

(SEAL)

NORTH ANNA POWER STATION
STEAM GENERATOR INSPECTION PORT LICENSE CONDITION

On January 21, 1980, Mr. D. F. Ross, Jr. of the Office of Nuclear Reactor Regulation forwarded a letter to VEPCO stating his requirement that a commitment be made to install Steam Generator inspection ports at North Anna Power Station Unit 2 prior to the start of commercial operation. The Unit 2 license included a commitment that, prior to resuming power operation following the first refueling outage, inspection ports would be installed in the Steam Generators.

Mr. Ross's reasoning for having the commitment made was based on a concern that the problem of the progression of tube denting was not being adequately addressed and preventative measures were not being developed. He concluded that to adequately monitor the progression of tube denting and to facilitate removal of selected tubes for laboratory analysis, the ports would be required.

The precautionary measures taken on Unit 2 to date have included

1. To preclude first row tube leaks due to manufacturing defects or residual stress corrosion cracking, all first row tubes have been plugged in all three Steam Generators. This was done prior to Unit Start-Up.
2. We have been carefully monitoring secondary chemistry parameters and have developed a restricted program of operations to ensure that appropriate plant evolutions (i.e., power reductions, shutdowns) are effected immediately following chemistry excursions. An increased awareness of the sensitivity of the Steam Generator corrosion process to chemistry of the feedwater has resulted from our experience with Unit 1.
3. The monitoring of condenser in-leakage has also been upgraded with the utilization of sophisticated helium leak testing techniques to detect tube degradation.
4. A training program for POWDEX operators has been developed and implemented. This, along with proposed design changes and careful operation of the POWDEX units will eliminate this source of feedwater contamination.

Based on these factors VEPCO feels that it is prudent to reconsider our earlier intention to install Steam Generator inspection ports at North Anna Unit 2. No significant additional benefit from an operational or safety standpoint can be identified for installation of inspection ports. Installation would result in additional personnel exposure (about 7.5 man-rem), another penetration into a critical pressure vessel with the attendant risk of a steam-break accident, substantial expenditures of manpower and monetary resources.

We agree that, in the presence of severe denting, inspection ports are a valuable inspection tool. However, it should be recognized that alternative precautionary measures can and have been taken which, in the light of current operating practices and policies, are more than adequate to preclude their necessity. VFPCO now feels that the safety implications of not installing the inspection ports are negligible, and it is requested that the license condition be removed.