VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 28261

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Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY NORTH ANNA POWER STATION UNITS 1 AND 2 PROPOSED CHANGE IN SGTR OPERATOR TRAINING COMMITMENT

On July 15, 1987, North Anna Power Station Unit 1 experienced a Steam Generator Tube Rupture (SGTR). As a result of this event, we issued a Steam Generator Tube Rupture Event Report. In this report, we committed to enhanced licensed operator training on SGTR and other primary-to-secondary events. The scope of this enhanced training provided that at least 5 of the 10 License Operator Requalification cycles conducted each year would be related to SGTR events. This commitment was first implemented in January 1988.

On January 1, 1989, Licensed Operator Requalification Program (LORP) training was revised to reflect a systems approach pursuant to 10 CFR 55.59 (c). This revised training is task based with all required areas covered over a two year period. Also, LORP training now consists of 8 cycles/year versus the 10 cycles/year that was used at the time of the commitment.

Currently the SGTR event training occurs in 5 out of 8 training cycles. However, LORP instructors and licensed operators have reported that the frequency of this training is out of proportion to training on the other areas presented within the program. This excessive training does not coordinate well with the other themes presented during training modules and detracts from the focus of individual presentations.

In addition to the above, the Steam Generator Tube Rupture Event Report analyzed the performance of the operating shifts. The report concluded that the Control Room Operators, the Senior Reactor Operators, and Shift Technical Advisors response to the SGTR was excellent. The report attributed the swift and proficient actions of the operations staff to the effectiveness of their training.

The original commitment to enhance SGTR event training was part of our aggressive approach to the recovery from the SGTR event. However, given the above, we now feel that a commitment to conduct SGTR training twice a year until the Unit 1 steam generator replacement is complete, then return to the LORP program using the

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systematic approach to training will enhance our LORP training by allowing for better coordination for other events presented during the training modules.

This revised commitment will increase emphasis on SGTR training until the Unit 1 Steam Generators have been replaced. Thereafter, LORP training will convert to the pure systematic task oriented method. This change will allow LORP training to revert to a balanced approach while maintaining the high level of SGTR training demonstrated by operator actions during the SGTR event of July 15, 1987.

If you have any questions or require additional information, please contact us.

Very truly yours,

W. L. Stewart Senior Vice President - Nuclear

Attachment

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