

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

May 30, 1990

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Serial No. 90-293  
NL&P/JDH:vlh  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**APPENDIX R ENGINEERING EVALUATIONS**

On March 21, 1986 (Serial No. 86-065), we submitted four engineering evaluations related to certain Appendix R fire protection features at North Anna for which we requested NRC review and approval. During the triennial Appendix R inspection conducted by NRC Region II on July 18-22, 1988, NRC inspectors identified a concern with two of those evaluations. Those evaluations were titled: "7. Evaluation of Operator Access to the Charging Pump Cubicles" and "8. Evaluation of Operator Access to the Motor Driven Auxiliary Feedwater Pump Room." Both evaluations determined that reentry into the affected fire area within thirty minutes to take certain manual actions was feasible.

The inspector's concern was discussed in NRC inspection report no. 50-338,339/88-13, dated September 13, 1988 in which the inspector questioned the validity of the reentry time assumption supporting those two evaluations. Traditionally, NRC has not approved entry into a fire area to take manual operations to mitigate the consequences of a fire in less than sixty minutes of a fire event. The issue was designated Unresolved Item 88-13-02 and Region II requested technical assistance from NRR to determine the acceptability of the evaluations.

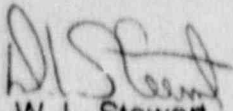
We have subsequently reevaluated the reentry time assumption contained in those evaluations. Through analysis we have been able to extend the period described in the evaluations from thirty to sixty minutes prior to requiring reentry into the affected fire areas. On April 4, 1990, we met with Messrs. L. Engle and D. Notley of NRR to describe our revised analysis.

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Based on establishing a sixty minute interval prior to requiring reentry into the fire area and our subsequent discussions with NRR staff, we are withdrawing our request for NRC review and approval of engineering evaluation nos. 7 and 8. Rather, the revised evaluations will be maintained onsite for NRC audit during future inspections as permitted by Generic Letter 86-10, "Implementation of Fire Protection Requirements," paragraph C, dated April 24, 1986.

Very truly yours,



W. L. Stewart  
Senior Vice President - Nuclear

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