

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 22, 1978

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. O. D. Parr, Chief
Light Water Reactors Branch No. 3
Division of Project Management
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 646
PO/DLB:scj
Docket No. 50-338 P
License No. NPF-4

Dear Mr. Denton:

Survey Monitoring T.S. Surveillance Requirement 4.7.12.1
North Anna Power Station

We have experienced difficulties in completing the surveillance requirements of North Anna Unit No. 1 Technical Specification 4.7.12.1 due to inconsistencies between the surveillance requirements and the bases for the requirements, typographical errors in T. S. Table 3.7-5, and deficiencies in the survey monitoring program.

The basis for surveillance requirement 4.17.12.1 states "The first survey was conducted in May 1976 to establish a base value for all survey points". The basis implies that total and differential settlements should be based on May 1976 values; however, T.S. Table 3.7-5 specifies bases other than the May 1976 basis in several cases and does not specify base value dates for survey points established after May 1976.

Difficulties in obtaining total and differential settlement values involve 27 survey points addressed by T.S. 4.7.12.1. Attachment 1 is a listing of these survey points. The majority of the data acquisition difficulties encountered fit into one of two categories:

1. Destroyed and Raset Survey Points

Settlement histories are incomplete because some survey points have been destroyed due to construction activities and not immediately replaced.

2. Base Values Not Established On Date Required

Some points requiring a May 1976 base value were established after May 1976. Some points requiring base values on dates specified by T.S. Table 3.7-5 were not surveyed for a base value on the date specified.

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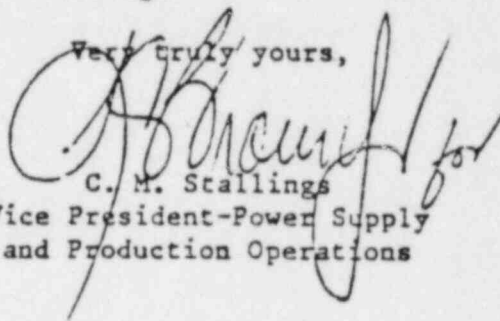
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We are currently reviewing all procedures and data from the first two and a half years of monitoring with the objective of improving our surveillance program. Actions to prevent future survey monitoring program deficiencies of the type described above and appropriate T.S. changes are being investigated.

There are no safety implications from any of the data collected thus far. Existing data verifies that no significant settlement has occurred. However, we believe the overall program will be enhanced by a total review of all aspects of settlement monitoring.

Very truly yours,


C. M. Stallings
Vice President-Power Supply
and Production Operations

cc: Mr. James P. C'Reilly