

ATTACHMENT 1

PROPOSED OPERATING LICENSE AMENDMENT

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- (15) Prior to resuming power operation following the first refueling outage except as specifically noted in paragraphs (h)(2) and (h)(4) below:
- (a) VEPCO shall submit the details of the inspection program for control rod guide thimble tube wall wear for Commission approval;
 - (b) VEPCO shall install inspection ports in the steam generators;
 - (c) VEPCO shall remove and inspect the recirculation spray pumps inside containment and replace pump bearings if necessary. A similar inspection shall be performed at least once every five years thereafter;
 - (d) VEPCO shall install leak test connections on the RHR isolation valves;
 - (e) VEPCO shall demonstrate by test the backup depressurization capability of the PORV's using the same shutdown procedure as described in VEPCO's procedure 2-OP-3.2 dated 07/23/80;
 - (f) VEPCO shall submit for Commission approval, the results of the tests applicable to North Anna Power Station, Unit 2, of a study concerning mixing of added borated water and cooldown under natural circulation conditions;
 - (g) VEPCO shall retest all engineered safety features reset control actions to verify proper reset action; and
 - (h) VEPCO shall implement the following design and procedural modifications with respect to diesel generator reliability:
 - 1) Complete a formal training program for all the mechanical and electrical maintenance and quality control personnel, including supervisors, who are responsible for the maintenance and availability of the diesel generators. The depth and quality of this training programs normally conducted by major diesel engine manufacturers;
 - 2) The lube oil system shall be modified to the manufacturer's recommendations for providing continuous lubrication of the lower portions of the engine. The modifications shall further provide for partial filling of the upper lube oil supply header and a lube oil booster/accumulator system which will force oil into the upper lube oil header during engine startup. The modifications shall be completed no later than the end of the second refueling outage.

- 3) The diesel generator operating procedures shall be modified to require loading the engine up to 50 to 75 percent of full load for one hour after eight hours of continuous no load operation;
 - 4) The fuel oil storage and transfer system shall be modified to include the installation of a separate high level alarm for each day tank, the installation of independent pressure switches for each pump which will be set to stop the pumps on high day tank level, and the submittal of Technical Specifications verifying proper operation of all transfer pump control switches and day tank high level alarms. The modifications shall be completed no later than the end of the second refueling outage.
 - 5) Each seven day fuel oil storage tank shall be provided with a seismic Category I, tornado missile, and flood protected emergency fill line. Each fill line shall have a shut-off valve, a strainer, and a truck fill connection consisting of a hose coupling with cap and chain; and
 - 6) With respect to vibration of Instruments and Controls, VEPCO shall either provide test results and results of analyses which qualify the engine skid mounted control cubicles for the severe vibrational stress that will be encountered during engine operation, or floor mount the skid mounted panels and control equipment presently furnished with the diesel generators.
- (16) Within 90 days following issuance of the pending revision of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," VEPCO shall provide a schedule acceptable to the NRC for bringing this facility in compliance with Regulatory Guide 1.97, as revised.
- (17) Prior to resuming power operation following the second refueling outage, VEPCO shall subject the low pressure turbines to an in-service inspection. The inspection shall consist of visual and volumetric examinations. The visual examination shall be applied to 100 percent of all the accessible surface of the rotors, discs and blading. The volumetric examination shall use an ultrasonic technique to fully examine the bore and keyway region of the discs in each low pressure turbine.
- The inspection results and evaluation of this inservice inspection shall be reported to the NRC and shall be accepted by the Commission prior to startup following the second refueling outage.
- The subject of the generation of turbine missiles for this facility is pending before the Atomic Safety and Licensing Appeal Board. The license condition imposed herein shall be subject to modification based on the resolution of this pending turbine missile issue.
- (18) No later than five years from the date of issuance of this license, VEPCO shall demonstrate to the satisfaction of the Commission that its examination techniques provide a reliable means of detection and

ATTACHMENT 2

DISCUSSION OF PROPOSED OPERATING LICENSE AMENDMENT

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Currently, North Anna Unit 2 License Condition 2.C(15)(h)(4) states, "The fuel oil storage and transfer system shall be modified to include the installation of a separate high level alarm for each dry tank, the installation of independent pressure switches for each pump which will be set to stop the pumps on high dry tank level, and the submittal of Technical Specifications verifying proper operation of all transfer pump control switches and dry tank high level alarms. The modifications shall be completed no later than the October, 1982 Fall maintenance outage."

Vepco proposes to complete North Anna Unit 2 License condition 2.C(15)(h)(4) by the end of the second refueling outage.

The reason for the proposed extension is due to the unavailability of Category I pressure switches that are to be installed to preclude dry tank overflow. Two pressure switches will be installed in the drain line on the bottom of the day tank. These pressure switches will be redundant to the existing level switches which stop the lead and back-up transfer pumps on high level. One pressure switch will provide a redundant signal to stop the lead transfer pump when the pressure indicates tank hi-level, while the second switch will provide a similar signal to the backup transfer pump. This modification will provide redundancy to prevent the pumps from running and causing an overflow condition. By preventing day tank overflow, the addition of these pressure switches will reduce the possibility of a fire due to oil spills. According to ASCO, manufacturer of the Category I pressure switches, there will be a 16 week lead time until the Category I pressure switches are available. This makes the availability of the Category I pressure switches in February or March of 1983.

Currently, North Anna Unit 2 License Condition 2.C(15)(h)(2) states, "The lube oil system shall be modified to the manufacturer's recommendations for providing continuous lubrication of the lower portions of the engine. The modifications shall further provide for partial filling of the upper lube oil supply header and lube oil booster/accumulator system which will force oil into the upper lube oil header during engine startup. The modifications shall be completed no later than the October, 1982 fall maintenance outage."

Vepco proposes to complete North Anna Unit 2 License Condition 2.C(15)(h)(2) by the end of the second refueling outage.

The modification to the North Anna Unit 2 H diesel generator lube oil system was completed during the unplanned maintenance outage that occurred from July 8, 1982 through August 30, 1982. The modification to the 2J diesel generator was delayed due to a broken terminal on the lube oil heater as well as the outage extension that would have been required to complete the modification. The lube oil heater has been returned to Fairbanks-Morse for repair. Vepco has not received a commitment from Fairbanks-Morse as to when the lube oil heater repair will be completed.

Currently, Vepco has cancelled the October, 1982 fall maintenance outage. The outage was cancelled because Unit 2 was shut down (an unplanned outage) most of the summer due to thermal sleeve removal, a main transformer problem and a tube lane blocking device problem.

North Anna Unit 1 has been shut down since May, 1982 due to control rod guide tube replacement, thermal sleeve removal, flow splitter removal and reactor coolant pump diffuser adapter bolt problems. All available manpower have been working the North Anna Unit 1 outage because it has become an extended outage.

It is not expected that the diesel generator will emergency start more than one or two times during this period. With an extension to the second refueling outage, (which is currently scheduled for April 1, 1983), the diesel generators would not be degraded and the diesel generators will continue to perform safely as they have in the past. Other diesel generator starts are performed in accordance with periodic test intervals. The periodic testing of the diesel generators are performed with approved procedures and with prelubrication.

The probability of occurrence or the consequences of a malfunction of equipment important to safety and previously evaluated in the FSAR is not increased because a delay in diesel generator day tank and lube oil system modifications will not adversely affect the performance of the diesel generators prior to the next refueling outage. The diesel generators will continue to run safely as they have in the past. Additionally, one diesel generator lube oil system is already modified thereby increasing the diesel generator reliability.

The possibility of a different type of accident or malfunction than was previously evaluated in the FSAR has not been created because a delay in the diesel generator day tank and lube oil system modification will not degrade the performance of the diesel generators. Normal starts are accomplished using approved procedures and the diesel generators are provided with prelubrication. The diesel generators are designed to start without prelubrication during an emergency.

The margin of safety as described in the BASIS section of any part of the Technical Specifications is not reduced because the delay will in no way affect the safe operation of the plant. The diesel generators will continue to run safely as they have in the past.