

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 15, 1990

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 90-606
NL&P/RMN
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
NUREG-0737, ITEM II.D.1 PORV AND BLOCK VALVE QUALIFICATION

In your March 21, 1989 letter on NUREG 0737 Item II.D.1, "Performance Testing of Relief and Safety Valves," you found that we had met the requirements of Item II.D.1 except where deficiencies were noted. The one noted deficiency pertained to the environmental qualification of the PORV control circuits and block valves. You requested that we take appropriate actions to resolve the noted deficiencies. In response, Virginia Electric and Power Company had ordered and scheduled for replacement environmentally-qualified motor-operators for the block valves.

On June 25, 1990, you issued Generic Letter 90-06 "Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability'; and Generic Issue 94 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors.'" In the generic letter, you stated that it is not cost effective to make the PORVs and block valves safety related. The requirements for safety related systems were listed including environmental qualification. The letter also referenced a Brookhaven National Laboratory study that showed only a relatively insignificant contribution to core melt probability due to PORV and block valve improvements. The BNL study did not consider bleed and feed capability, which the letter referred to as a valuable option. As a result, you have proposed various maintenance and testing techniques in lieu of design modifications in order to affect reliability improvements. We therefore interpret Generic Letter 90-06 to mean that block valve operators and the PORVs need not be upgraded with environmentally qualified components.

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Based on this interpretation, it is our intent to take no further actions to address the noted deficiency in your March 21, 1989 letter and to comply with the guidance in Generic Letter 90-06.

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

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

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