

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 31, 1990

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

Serial No. 90-779
NL&P/JBL:jbl R0
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
SUPPLEMENT TO PROPOSED TECHNICAL SPECIFICATIONS
CHANGE REQUEST - CONTAINMENT ISOLATION VALVES

On February 23, 1989, Virginia Electric and Power Company requested a license amendment regarding certain containment isolation valves. Subsequent discussions with the NRC North Anna Project Manager have indicated that one aspect of our proposed change request is unacceptable. The NRC staff disagrees with our determination that certain containment penetrations, which are identified as part of a "closed" system, are not subject to the testing requirements of 10 CFR 50, Appendix J. Therefore, we are supplementing our previous submittal by withdrawing that aspect of the request. Instead, we request that these penetrations be considered exempt from the Type C penalty on the Type A test results. This is consistent with the way other "water-filled" penetrations are treated with respect to Appendix J.

The subject valves are those valves which control service water flow to and from the Recirculation Spray Heat Exchangers (i.e., MOV-SW103A, B, C, and D and MOV-SW104A, B, C, and D for Unit 1 and MOV-SW203A, B, C, and D and MOV-SW204A, B, C, and D for Unit 2). These valves are outside of containment and the service water in the piping system does not communicate with the containment atmosphere or any other system inside containment.

As identified in our original submittal, these service water valves receive an "open" signal on a Containment Depressurization Actuation (CDA) signal. Hence, in addition to being part of a closed system, these valves are water filled under accident conditions. Therefore, similar to the discussion of water-filled penetrations provided in the original change request, we have added the ## footnote symbol to these valves in Table 3.6-1, Containment Isolation Valves. The ## footnote indicates that the Type C leakage rate penalty is not to be added to the Type A test results. The discussion for justification of this change is the same as for the other "water-filled" penetrations provided as part of our February 23, 1989 submittal.

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This supplemental information is being provided so that our proposed Technical Specification change request can be approved by the NRC prior to the end of the next North Anna Unit 1 refueling outage (scheduled for March 26, 1991). The supplemental Technical Specifications change pages for North Anna Units 1 and 2 are provided in Attachments 1 and 2, respectively.

We have reviewed this submittal with respect to the MERITS version of the North Anna Technical Specifications and have determined that no change is required to the MERITS submittal.

This supplemental change has been reviewed by the Station Nuclear Safety and Operating Committee and has been determined not to involve an unreviewed safety question as defined in 10 CFR 50.59. The supplemental information does not change the results of our no significant hazards consideration determination previously submitted. Therefore, the original no significant hazards consideration determination remains bounding.

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

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachments

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