VIRGINIA ELECTRIC AND FOWER COMPANY RICHMOND, VIRGINIA 23261

October 26, 1995

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555 Serial No. 95-556

NAPS/JHL

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
CHANGE IN COMMITMENT FOR SECURITY POSTING AT THE SERVICE
WATER PUMP HOUSE DURING SERVICE WATER RESTORATION

In our letters dated March 29, 1985 and July 1, 1985, Virginia Electric and Power Company submitted information requesting a change to Technical Specification 3.7.4. The change permits the use of a 168-hour action statement during the restoration of the service water system.

Your letter dated August 9, 1985 requested additional information pertaining to the license amendment request. This request for additional information reflected concern about the potential flooding of buildings containing safety related equipment when the service water headers were opened for cleaning. As a result, the following measures were committed to, in our letter dated August 22, 1985, for any 168-hour service water action statements which created the potential for flooding:

- Manual boundary valves would be tagged closed and then verified closed by a second individual.
- 2. Motor operated boundary valves would be closed, tagged, verified by a second individual, and the power removed from the motor circuit.
- Boundary valves greater than or equal to 18 inches would be chained and locked in the closed position.
- 4. An Abnormal Procedure would be developed for response to postulated flooding which would include posting a "valve watch" operator in the Auxiliary Building basement to take appropriate action in the event of flooding.
- The cubicles housing the charging pumps in the Auxiliary Building basement would be sealed to prevent inleakage in the event of a flood outside of the cubicles.

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9510310416 951026 PDR ADOCK 05000338 F PDR 6. A Security Officer would be posted at the service water pump house to ensure that the closed and locked pump discharge valves would not be tampered with.

The NRC approved the license amendment request by letter dated October 25, 1985 with the issuance of License Amendment Nos. 70 and 56. The associated Safety Evaluation Report stated, "Also, constant on-location surveillance by plant personnel will minimize the possibility of a flooding occurring."

This letter is to inform you that we are revising our commitment for posting a Security Officer at the service water pump house. As part of the security system upgrades, access to the service water pump house has come under more strict control. The service water pump house currently remains locked and alarmed. We have determined that this mode of control is comparable to Protected Area access in that the Security Department controls who has access to the area. These service water pump house valves will be treated similar to the other closed, chained, and locked valves in the service water system when service water restoration activities are ongoing (i.e., no constant security personnel surveillance). These controls are considered adequate and equivalent to the original commitment. Therefore, a Security Officer will no longer be posted at the service water pump house during service water system restoration activities that could have the potential for flooding.

It should be noted that this change in commitment does not change the requirement for security postings to prevent unauthorized personnel access into the Protected Area or a Vital Area. These security postings will be imposed whenever openings in the service water piping would permit such unauthorized access.

If you have any questions, please contact us

Very truly yours,

RA Saunders for James P. O'Hanlon

Senior Vice President - Nuclear

cc: U.S. Nuclear Regulatory Commission

Region II

101 Marietta Street, N.W.

Suite 2900

Atlanta, Georgia 30323

Mr. R. D. McWhorter

NRC Senior Resident Inspector

North Anna Power Station