

Mr. J. P. O'Hanlon
Senior Vice President - Nuclear
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

October 30, 1995

SUBJECT: SERVICE WATER SYSTEM PIPING INSPECTION AND REPAIR-NORTH
ANNA POWER STATION, UNITS 1 & 2 (NA-1&2)

Dear Mr. O'Hanlon:

By letter dated March 30, 1995, as supplemented by letter dated August 24, 1995, you requested temporary changes to the NA-1&2 Technical Specifications (TS) to facilitate inspection and repair of the service water system (SWS) piping. On October 11, 1995, Amendment Nos. 194 and 175 for NA-1&2 were issued regarding your requested changes for the NA-1&2 TS.

Although the staff determined that your requested changes to the TS were acceptable and should be approved, the staff takes exception to one aspect of your 10 CFR Part 50.59 review. The staff's position is provided below.

You estimated that the requested changes to the TS involved a very slight increase (less than 1E-6) in the core damage frequency and considered this "...not to be a significant reduction in margin of safety." Consequently, you concluded that the requested changes to the TS would not involve an unreviewed safety question. The requirements stated in 10 CFR Part 50.59 do not include a specific threshold below which the effects of a change are considered to be inconsequential, and the NRC staff has not endorsed a threshold value whereby a reduction in the margin of safety may be considered to be negligible or inconsequential. Therefore, your arbitrary selection and use of a threshold value in this regard was inappropriate. By this letter you are being made aware of the staff's position to assure that other evaluations of this nature have been properly performed.

Sincerely,

(Original Signed By)

Leon B. Engle, Project Manager
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-338 and 50-339

cc: See next page

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Mr. J. P. O'Hanlon
Virginia Electric & Power Company

North Anna Power Station
Units 1 and 2

cc:

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