

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

November 3, 1995

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Serial No. 95-555
NAPS/JHL/MAE R4
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT NOS. 1 AND 2
CHANGE IN COMMITMENT FOR ULTRASONIC
TESTING OF EQUIPMENT AND ESCAPE HATCH SEALS

On February 27, 1990, in an enforcement conference, Virginia Electric and Power Company presented the circumstances of a containment equipment hatch emergency escape lock door leakage event. During the conference, the requirements of Technical Specification 3.6.1.1, Containment Integrity, were discussed. The surveillance demonstrating the operability of the equipment and escape hatches once per 31 days by ultrasonically testing the seal, was incorrectly attributed as a Technical Specification requirement. Surveillance Requirement 4.6.1.1 does not specifically require ultrasonic testing. Ultrasonic testing of the seals has continued to be performed in addition to the surveillance requirements.

The Technical Specifications currently require pressure testing of the containment equipment hatch and emergency escape lock doors. Pressure testing has been effective in maintaining containment equipment hatch and emergency escape lock door integrity. Ultrasonic testing of the containment equipment hatch and emergency escape lock doors has been performed to confirm the results of pressure testing. It has now been determined that ultrasonic testing is not an effective method for identifying seal leakage. Furthermore, ultrasonic testing results in additional personnel radiation exposure without commensurate benefit.

Therefore, based on the above discussion, our previous commitment to perform ultrasonic testing of the containment equipment hatch and emergency escape lock doors at least once per 31 days is being discontinued. Containment integrity will be verified in accordance with the Surveillance Requirements of Technical Specification 3.6.1.1 and 3.6.1.3.

If you have any questions, please contact us.

Very truly yours,

R J Saunders for

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