VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

W. L. STEWART VICE PRESIDENT NUCLEAR OPERATIONS

January 31, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. James R. Miller, Chief
Operating Reactors Branch No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

NO/JDH:acm Docket Nos. 50-338 50-339 License Nos. NPF-4 NPF-7

Gentlemen:

NORTH ANNA POWER STATION UNIT NOS. 1 AND 2 10CFR50 APPENDIX R

In our October 31, 1984 letter (Serial No. 231B), we restated our commitment to complete the Emergency Lighting Upgrade Modification by January 31, 1985. As expressed verbally to the NRC North Anna Project Manager, Mr. L. Engle, by Mr. R. Hardwick of Virginia Power on December 20, 1984, we have encountered unforeseen problems in meeting these schedules. Since that time, we have been assessing the impact of these problems on the existing scope and schedule for the project.

The scope, as understood on October 31, 1984, for the Emergency Lighting Upgrade Modifications was to install approximately 138 lights in various areas throughout the plant and to perform an eight-hour battery duration test. Subsequently, several factors have been identified which have had a significant impact on our ability to meet the January 31, 1985 completion date:

- Subsequent review of the safe shutdown paths added approximately fifty additional lights to be installed.
- Testing requirements were increased to include illumination tests to verify the lighting calculations.
- 3. Due to physical space limitations in several areas requiring the installation of emergency lights, changes are required in the type of battery packs to be used. This change will require additional materials to be purchased and changes to the original installation design.

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4. A concern regarding temperature effects on the batteries was recently identified and had to be addressed and resolved. Although the evaluation concluded that the temperature effects were negligible, battery pack installation was temporarily suspended pending resolution.

The Auxiliary Building Sprinkler System Upgrade Modification is behind schedule due to the following:

- 1. The final design of the pipe supports and hangers significantly increased the construction scope.
- A question has arisen concerning the certification of the sprinkler heads. We are currently addressing this issue with the vendor.

Therefore, due to the above considerations, we will not complete the Emergency Lighting Upgrade Modification and the Auxiliary Building Sprinkler System Upgrade Modification by January 31, 1985. The existing compensatory measures will continue until the modifications are complete. We are in the process of evaluating the impact of these changes on the project schedule. An update will be provided to the NRC on the status of these items by February 22, 1985.

Please contact us if you have any questions regarding this matter.

Very truly yours,

W. L. Stewart

cc: Mr. James P. O'Reilly Regional Administrator Region II

> Mr. M. W. Branch NRC Resident Inspector North Anna Power Station

Mr. T. E. Conlon Region II

Mr. R. C. DeYoung, Director Office of Inspection and Enforcement