VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

February 27, 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

Serial No. 85-035
NO/JHL:pa
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
MECHANICAL CLEANING OF THE SERVICE WATER
PIPING AND VALVE REPAIRS

On October 2, 1984 and again on December 5, 1984, VEPCO held meetings with the NRC Staff to discuss the removal of corrosion from the North Anna service water system piping and valves. At these meetings the solution to the corrosion problems and the mechanical cleaning program to be implemented at North Anna were also discussed. As a result of these meetings, VEPCO has prepared the enclosed submittal which addresses the NRC Staff's various comments and documents the mechanical cleaning methodology to be used.

This mechanical cleaning program has been reviewed and approved by the Station Nuclear Safety and Operating Committee (SNSOC). It has been determined that this mechanical cleaning program does not involve an unreviewed safety question as defined in 10CFR50.59 and does not pose a significant hazards consideration as defined in 10CFR50.92. The proposed program does result in some increase in the probability of the loss of service water flow during periods when one of the redundant service water loops is inoperable. However, operation in this mode is permitted by the Technical Specifications. The remaining shared redundant service water loop has the capability to provide heat rejection and supply cooling water to the various components required for both normal operation and accident conditions. Isolation of the service water system will be done only when necessary and will be controlled by station administrative procedures and compensatory measures as described in the enclosure.

In addition, each of the work packages that is described in the enclosure will be developed and administered under the Design Control Program and Quality Assurance Program and approved by SNSOC prior to implementation. Each work package will include requirements for precautions to minimize risks and impact on normal operation.

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VEPCO proposes to begin implementing the mechanical cleaning for Technical Specification related work during April, 1985. We are currently proceeding with the mechanical cleaning of the non-Technical Specification related work delineated in the enclosure. We request NRC concurrence in our Mechanical Cleaning Program as defined herein by April 15, 1985.

VEPCO will submit in March, 1985, a license amendment to extend the action statement of Technical Specification 3/4.7.4. Upon NRC approval of the amendment to extend the action statement time requirements, VEPCO will use the revised Technical Specification with the program for the mechanical cleaning of the service water system piping and valves.

Very truly yours,

W. L. Stewart

Enclosure

cc: Dr. J. Nelson Grace
Regional Administrator
Region II

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