

July 25, 1985



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

Serial No. 85-457
NO/JDH:acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

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NORTH ANNA POWER STATION UNITS NOS. 1 AND 2
APPENDIX R REANALYSIS UPDATE

This letter confirms our newly scheduled date for the Appendix R audit of September 9-13, 1985 for North Anna Power Station and provides a status update for the reanalysis effort. In order to ensure the reanalysis report remains current, we plan to update the report prior to the scheduled audit date. The proposed change is summarized herein. This will also ensure that the most current information will be available at the time of the audit and is consistent with our commitment, made in our May 1, 1984 submittal, to maintain the accuracy of the analysis report so that it will be a design basis document for future reference.

The report was originally submitted on May 1, 1984 (Serial No. 231) and March 8, 1985 (Serial No. 85-114). The first revision was submitted on October 31, 1984 (Serial No. 231B) which affected the second volume only.

The proposed revision, Revision 2, will include the following:

Exemptions Two additional technical exemption requests are being proposed. One addresses the Control Room Emergency Lighting System which is powered from the emergency electrical distribution system which is supplied by a protected emergency diesel generator. This exemption request is needed because 10CFR50 Appendix R paragraph III.J specifically states that emergency lighting must be provided by battery packs. The other exemption request is required because of the high radiation doses that would be received while installing and maintaining an emergency lighting station in the seal injection filter cubicle. In lieu of a fixed system, an administratively controlled portable lantern will be installed near the access to the room.

Modifications Modification I-14, Air Operated Valve modification for RCS letdown, is no longer required due to refinements in the reanalysis and will be deleted. Two supporting exemptions, on emergency lighting in

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containment (Exemption No. 29) and on establishing letdown using offsite personnel (Exemption No. 30), will also be deleted.

Analyses The Appendix R Report will be revised to include the following refinements in the reanalysis:

- . the need to establish a letdown flowpath from the reactor coolant system has been eliminated due to refinements in the analysis assumptions.
- . the basis and assumptions used in the development of the safe-shutdown procedures, including the mitigation of spurious operations, will be clarified
- . the fire severities, by fire area, will be revised to reflect the latest combustible loadings
- . the discussions of communications, instrumentation, and ventilation concerns will be included in the summary table on a fire-area basis (Vol 1, Chapter 4)
- . evaluations that address the "room concept" for the areas that are within designated fire areas, but are not affected by a common fire, will be included.
- . Exemption No. 28, which discusses the Auxiliary Building ventilation equipment area, will be revised to reflect a relocation of the auxiliary building fan modification.

Editorial/Format Changes Several editorial or format changes are also included:

- . the fire area for the Technical Support Center will be renumbered
- . several references to instruments and valves will be revised due to the addition/elimination of these components from the listing of equipment required for safe shutdown
- . references to the Appendix R drawings that will be added to the Station Controlled Drawing series will be included



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The NRC North Anna Project Manager, Mr. L. Engle, and the NRC Region II representative, Mr. G. Wiseman, have been advised of this planned revision. It is our current plan to submit this revision to the NRC by August 19, 1985.

Very truly yours,

for W. L. Stewart

cc: Dr. J. Nelson Grace
Regional Administrator

Mr. L. Engle
NRC North Anna Project Manager

Mr. T. E. Conlon
NRC Region II

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