VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

October 15, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. H. L. Thompson, Jr., Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 85-683
NO/ALM:cfm
Docket No. 50-338
License No. NPF-4

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT 1
EXTENSION REQUEST - REGULATORY GUIDE 1.97 AND
SAFETY PARAMETER DISPLAY SYSTEM COMMITMENTS

Your Confirmatory Order of June 14, 1984, specified a completion schedule for commitments of Supplement 1 to NUREG-0737 for North Anna Power Station (NAPS). This Confirmatory Order contained a provision allowing the Director, Division of Licensing, to grant extensions of time for completing the identified items "for good cause shown". We have identified several items regarding Regulatory Guide 1.97 and the Safety Parameter Display System (SPDS) which cannot be completed prior to resuming power operation after the 5th refueling cycle for Unit 1. Consequently, we request a schedule extension until the end of the 6th refueling outage (currently scheduled for May 1, 1987 to July 15, 1987).

North Anna Unit 1 Reg. Guide 1.97 and SPDS commitments are presently based on the 5th refueling outage, which as of April 1985 was scheduled for April 11, 1986 through June 2, 1986. During April 1985 the Unit 1 refueling outage was rescheduled forward to November 1, 1985 through December 19, 1985. This was done to avoid four refueling outages in one year for our two nuclear stations. In the past when we have scheduled two refueling outages at a given plant in close succession, we have experienced undesirable declines in employee productivity and efficiency. Two closely scheduled refueling outages for a given station places a heavy burden on the station personnel. We therefore decided to reschedule our North Anna outage to avoid this close succession. This rescheduling of the outage has had an adverse impact on our ability to complete procurement, planning and installation of planned Reg. Guide 1.97 and SPDS plant modifications by the end of the Unit 1 refueling.

Our administrative practices, which govern the scheduling of plant modifications during refueling outages, require that the engineering be completed and approved and all material for a project be on site 30 days

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prior to the outage. This 30-day requirement is necessary to allow sufficient time to schedule installation of all plant modification projects and to determine manpower requirements needed to perform the modifications. Past practices have indicated that a time period of less than 30 days leads to confusion in the planning process, increases the potential for inadequate preparation for installation resulting in startup problems and delays in outage-related activities, which ultimately results in outages of longer than scheduled duration.

Reg. Guide 1.97

In our letter of February 21, 1984, we committed to comply with Reg. Guide 1.97 for 29 specific variables during the first refueling outage after July 1985. We presently expect to be in compliance with 17 (62%) of the variable modifications during the upcoming Unit 1 outage. The attachment explains the status as of October 1, 1985 of the modifications that will not be completed during the upcoming Unit 1 outage. (Also included are two items that were requested to be reclassified in our letter of May 10, 1985). Engineering for two of these variables has not been completed and equipment for eleven of these variables has not been received in sufficient time to support our administrative practice of processing modifications 30 days prior to the outage. As a result, we have now determined that we can not complete modifications on twelve variables by the end of this refueling outage. It should be noted that had the refueling outage schedule not been advanced, all but one of these items would have been able to be completed.

Our letters of May 10, July 5, and August 2, 1985 (Serial No. 85-094, 094A, and 094B, respectively) are currently pending staff approval. These letters were written in response to your February 8, 1985 letter, which identified several Reg. Guide 1.97 open items for North Anna, for which the Staff required additional justification. In our May 10, 1985 letter, we took exception for two variables, Containment Sump Narrow Range Level (B-12A) and Boric Acid Charging Flow (D-6), by reclassifying them from Category 2 to Category 3 and therefore modifications are not considered necessary. Also in our May 10, 1985 letter we identified the deletion of Emergency Diesel Generator - KVAR (D-35AB) from the TSC and EOF display commitments, since this information is no longer considered necessary in the TSC and EOF for normal or post accident operation. In our May 10 and July 5, 1985 letters, we reaffirmed our position that environmental qualification was not required for RHR System Flow (D-1), RHR Heat Exchanger Outlet Temperature (D-2), Accumulator Tank Level (D-3), Accumulator Isolation Valve Position (D-5), and Containment Sump Water Temperature (D-26). Correspondingly we reclassified these items from Category 2 to Category 3. In our August 2, 1985 letter, we deleted RCS Flow (A-6) as a Type A variable although Reactor Coolant Pump Status (D-10) was maintained as a Type D variable. In the May 10, 1985 and July

5, 1985 letters we also made new commitments to upgrade the instrumentation for Pressurizer Heater Status Indication (D-13) and Accumulator Pressure (D-4), respectively during the refueling outages currently scheduled in 1987. The Reg. Guide 1.97 completion status provided in this letter includes as a basis the above mentioned exceptions and schedule clarifications.

SPDS

In our letter of April 15, 1983, we committed to have the SPDS installed and operators trained at North Anna prior to the end of the 1986 refueling outage. The SPDS computer and approximately 83% of the 1055 data input connections are planned to be installed by the end of the upcoming Unit 1 outage. Of the remaining data input connections, approximately 159 are required for SPDS displays, approximately 34 of which are related to Reg. Guide 1.97 variables that will not be installed until the sixth refueling outage, per our above request. The other 125 data points will not be completed since seismic panels required to mount certain multiplexers have not been received prior to the administrative cutoff date. In addition, SPDS software verification and validation and operator training will be delayed until completion of all data input connections. The delay in completion of the SPDS commitment is directly related to the rescheduling of the Unit 1 fifth refueling outage and will likewise impact the date the data communications portion of the Emergency Response Facilities is declared fully functional.

For the above reasons, we request an extension until resuming power operation following the sixth refueling outage to complete commitments for Reg. Guide 1.97 and SPDS for North Anna Unit 1.

If you have any questions on the above requests, please contact us.

Very truly yours,

W. L. Stewart

Attachment

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

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

Mr. Edward J. Butcher, Acting Chief
Operating Reactor Branch No. 3
Division of Licensing

Attachment

STATUS OF OUTSTANDING
REG. GUIDE 1.97 COMMITMENTS FOR WHICH WE ARE REQUESTING AN EXTENSION

VARIABLE TITLE	VARIABLE #	STATUS AS OF OCTOBER 1, 1985*
High Pressure Safety Injection Flow	A-8	Rosemount transmitters have not been delivered.
Refueling Water Storage Tank Level	A-10	Rosemount transmitters have not been delivered and engineering has not been completed.
Valve Monitoring Package	A-11	Materials from Technology for Energy Corp. and Conax Seal assemblies have not been delivered.
Pressurizer Liquid Temperature	A-12	Weed RTD's have not been delivered.
Containment Sump Narrow Range Level	B-12A	Requested reclassification to category 3 in letter dated May 10, 1985 (Serial Number 85-094). No additional modifications presently planned.
Containment Sump Wide Range Level	B-12B	Replacement GEMS sensor can not be purchased due to vendor QA problems. A study to develop alternatives is underway.
Containment Isolation Valve Position	B-14	Miscellaneous tubing and valves have not been delivered.
Boric Acid Charging Flow	D-6	Requested reclassification to category 3 in letter dated May 10, 1985 (Serial Number 85-094). No additional modifications presently planned.
Main Steam Relief Valve Position	D-19	Rosemount transmitters and fiber optic connectors have not been delivered.
Containment Fan Heat Removal	D-24	Rosemount transmitters and the flow orifice plates required for this modification have not been delivered.

Attachment

STATUS OF OUTSTANDING (Con't)
REG. GUIDE 1.97 COMMITMENTS FOR WHICH WE ARE REQUESTING AN EXTENSION

VARIABLE TITLE	VARIABLE #	STATUS AS OF OCTOBER 1, 1985*
Volume Control Tank Level	D-29	Maxi-bolts have not been delivered.
Component Cooling Water Temperature	D-30	Rosemount transmitters and the flow orifice plates required for this modification have not been delivered.
Component Cooling Water Flow	D-31	Rosemount transmitters and the flow orifice plates required for this modification have not been delivered.
Gaseous Waste Flow	E-9	Engineering has not been completed.

*30 day administrative cutoff date