

Mr. J. P. O'Hanlon  
Senior Vice President - Nuclear  
Virginia Electric and Power Company  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

November 13, 1996

SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2 - REQUEST FOR  
ADDITIONAL INFORMATION CONCERNING EMERGENCY DIESEL  
GENERATOR ALLOWED OUTAGE TIME (TAC NOS. M93415 AND  
M93416)

Dear Mr. O'Hanlon:

In order to continue our evaluation of the above subject material, we  
find that it is necessary for you to respond to our request for additional  
information delineated in the Enclosure.

Sincerely,

(Original Signed By)

Bart C. Buckley, Sr. Project Manager  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-338  
and 50-339

Enclosure:  
As stated

cc w/encl: See next page

Distribution  
Docket File  
PUBLIC  
PDII-1 RF  
S. Varga  
J. Zwolinski  
OGC  
ACRS

**NRC FILE CENTER COPY**

FILENAME - G:\NOANNA\93415.LTR

OFFICE	PM:PDII-1	LA:PDII-1	AD:PDII-1		
NAME	BBuckley	Dunnington	MReinhart		
DATE	11/13/96	11/13/96	11/13/96		
COPY	Yes/No	Yes/No	Yes/No		

9611180069 961113  
PDR ADOCK 05000338  
P PDR

DF01/1

Mr. J. P. O'Hanlon  
Virginia Electric & Power Company

North Anna Power Station  
Units 1 and 2

cc:

Mr. William C. Porter, Jr.  
County Administrator  
Louisa County  
P.O. Box 160  
Louisa, Virginia 23093

Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street, N.W.,  
Suite 2900  
Atlanta, Georgia 30323

Michael W. Maupin, Esquire  
Hunton and Williams  
Riverfront Plaza, East Tower  
951 E. Byrd Street  
Richmond, Virginia 23219

Mr. W. R. Matthews, Manager  
North Anna Power Station  
P. O. Box 402  
Mineral, Virginia 23117

Dr. W. T. Lough  
Virginia State Corporation  
Commission  
Division of Energy Regulation  
P. O. Box 1197  
Richmond, Virginia 23209

Mr. Al Belisle  
U.S. Nuclear Regulatory Commission  
101 Marietta Street N. W. Suite 2900  
Atlanta, Georgia 30323-0199

Old Dominion Electric Cooperative  
4201 Dominion Blvd.  
Glen Allen, Virginia 23060

Mr. David Christian, Manager  
Surry Power Station  
Virginia Electric and Power Company  
5570 Hog Island Road  
Surry, Virginia 23883

Mr. M. L. Bowling, Manager  
Nuclear Licensing & Operations  
Support  
Virginia Electric and Power Company  
Innsbrook Technical Center  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

Office of the Attorney General  
Commonwealth of Virginia  
900 East Main Street  
Richmond, Virginia 23219

Senior Resident Inspector  
North Anna Power Station  
U.S. Nuclear Regulatory Commission  
1024 Haley Drive  
Mineral, Virginia 23117

Robert B. Strobe, M.D., M.P.H.  
State Health Commissioner  
Office of the Commissioner  
Virginia Department of Health  
P.O. Box 2448  
Richmond, Virginia 23218

Request for Additional Information  
on the North Anna 1/2 Application for Technical Specifications Change  
on EDG Allowed Outage Time (AOT) Extension

1. Proposed Technical Specification 3.8.1.1 Action b (Limiting Condition of Operation with one emergency diesel generator (EDG) inoperable) is unacceptable. This action statement must be rewritten such that the requested 14-day allowed outage time is always applicable when an EDG is inoperable for whatever reason - not just once every 18 months when an EDG is in special maintenance. Also, this action statement must be conditioned upon the Alternate AC Source (AAC) being operable and "connectable" (breakers required for alignment to inoperable EDG's bus are operable, control power is available, etc.). Also, if the AAC is not operable, allowed outage time is limited to the current 72 hours.
2. Proposed Technical Specification 3.8.1.1.b.2 states that the provisions of Specification 3.0.4 are not applicable. This is unacceptable to the staff. The licensee should remove this statement from the proposed Technical Specification.
3. The licensee should provide the actual out-of-service time needed to perform the replanned EDG maintenance.
4. Recently the staff has become concerned, due to the inadequate design at another power plant, about the adequacy of the dc voltage supply to the AAC. Specifically, the scenario of concern starts with the loss of offsite power and the loading of the EDG(s). If the battery charger for the dc supply to the AAC is not powered from an EDG-powered bus and the associated battery does not have adequate capacity, the availability of the AAC source is questionable should all ac sources be subsequently lost. In light of this scenario, discuss the details of the power sources to the battery charger associated with the AAC source and the capacity of the charger and its associated battery.
5. By letter dated April 12, 1996, the NRC requested additional information for review of your proposed changes to the North Anna Technical Specifications (TS). This request included a discussion on the three-tier approach the NRC staff expects licensees to utilize in proposing risk-based modifications. Tier one involves determination of the change in operational risk. Tier two involves assurance that risk-significant plant equipment outage configurations will not occur while the plant is subject to the Limiting Condition for Operation (LCO) for the proposed modification. The third tier assures that, before performing maintenance activities including removal of any equipment from service, the licensee performs a thorough assessment of the overall impact of the activity on safety functions of related TS activities. During the September 25, 1996, meeting between NRC staff and your staff, discussions involved how the three tiers are satisfied at North Anna. The following questions reflect our discussion of these issues.

Tier 2

1. Please submit a copy of procedure 1-MOP6.90 that lists combinations of equipment that cannot be removed from service simultaneously.

Tier 3

2. Please submit a copy of the configuration risk management matrix discussed in the meeting and please discuss the probabilistic risk assessment basis of the matrix. In your explanation of the basis of the matrix, please explain how the elements of the matrix are determined and categorized.
3. How do you assess the resulting overall impact on safety functions when equipment that is not in the matrix is removed from service?
4. Please also explain and submit a copy of the procedural program in which the configuration risk management matrix is imbedded.
5. Are there currently plans to acquire a safety monitor as a more accurate method of enhancing configuration risk management? If so, when do you plan to implement the safety monitor, how do you plan to maintain the monitor, and who will be trained? If not, describe how you assess the risk-based significance of taking or having a component taken out of service.