

Hand Delivered



VIRGINIA POWER

September 22, 1998

Mr. L. Samuel Lilliard
Office of Spill Response and Remediation
Virginia Department of Environmental Quality
629 East Main Street
Richmond, VA 23240-0009

**Re: AST REGULATIONS EXTENDED COMPLIANCE SCHEDULE – NORTH
ANNA NUCLEAR POWER STATION (ODCP NO. FC-06-7030)**

Dear Mr. Lilliard:

In accordance with section 9VAC 25-91-40.B of the Facility and Aboveground Storage Tank (AST) Regulations, Virginia Power is requesting approval for an extended compliance schedule for specific provisions of Part III (9 VAC 25-91-130, Pollution Prevention Requirements) for North Anna Nuclear Power Station. The facility has an aggregate storage capacity of less than 1 million gallons. The specific provisions and proposed compliance dates are as follows:

- Inventory control and testing for significant variations (9 VAC 25-91-130.B.1) will be completed by February 28, 1999. The major portion of the work required to comply consists of revising procedures and reviewing instrumentation systems.
- Safe fill and shutdown practices (9 VAC 25-91-130.B.3) will be completed by February 28, 1999. The major portion of the work required to comply is procedure revisions.
- Visual daily and weekly inspections (9 VAC 25-91-130.B.5) will be completed by February 28, 1999. Most of the provisions of this section are included in existing procedures; however, to include the remaining items will require procedure revisions.

The primary reason in requesting approval of an extended compliance schedule is the method of operation practiced at the station as required by the NRC and necessitated by the safety concerns related to operating a nuclear power station. In order to assure safe operation of the station we operate through an extensive system of written procedures. In fact, the NRC requires compliance with approved station procedures and it is not appropriate for us to operate systems without an approved procedure in place. To comply with the previously specified provisions of the AST regulation we will need to revise more than 60 procedures. Following the initial draft incorporating the pollution prevention requirements, each of the procedures must undergo an extensive review and approval process.

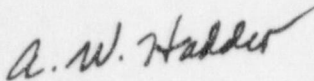
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The procedure revision process is also affected by the station undergoing an outage during September and October. The amount and scope of the major outage activities (e.g., refueling, equipment maintenance and replacements, system inspections) increases the time required for the procedure revision process.

Please contact Wes Sprouse at 273-3552 with any questions.

Sincerely,



A. W. Hadder

Manager
Environmental Policy & Compliance

Mr. L. Samuel Lilliard

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cc:

U.S. Nuclear Regulatory Commission

Region II

Atlanta Federal Center

61 Forsyth Street, SW

Suite 23T85

Atlanta, GA. 30303

RE: North Anna Units 1 and 2

Docket Nos. 50-338/50-339

License Nos. NPF-4/NPF-7

U.S. Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, DC 20555

RE: North Anna Units 1 and 2

Docket Nos. 50-338/50-339

License Nos. NPF-4/NPF-7

Mr. M. J. Morgan

NRC Senior Resident Inspector

North Anna Power Station