VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

October 23, 1998

United States Nuclear Regulatory Commission Attention: Document Control Desk Washington, D. C. 20555 Serial No. 98-631 NAPS/JHL R0 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 CHANGE IN COMMITMENT FOR VERIFYING FIRE BRIGADE MEMBERS

NRC Inspection Report 50-338/80-09 and 50-339/80-07, dated March 7, 1980, included a violation for only having four fire brigade members on site in lieu of five members as required by Technical Specification 6.2.2.f. The response to the violation, dated April 3, 1980, indicated that a Security general order had been written requiring the Security Shift Supervisor to verify at the beginning of each shift that five fire brigade members are present on site. This included verification for one of these members to be a scene leader. This letter is to inform you that we are changing our method of ensuring that the appropriate number of fire brigade members are assigned to each operating shift. A discussion is provided below.

Presently, a Security general order, Security implementing procedure, and Virginia Power Administrative Procedure are used to verify five fire brigade members are assigned to each operating shift. This includes the designation of a fire brigade scene leader. In addition, the Operations Department documents the same information as part of the Watch Bill. To eliminate duplication of activities, we are revising our commitment to allow the Operations Department to verify that five fire brigade members, including the designation of a scene leader, are available on site for each operating shift.

Since the 1980 response to the Notice of Violation, the Fire Protection Program requirements have been removed from the Technical Specifications and now reside in the Technical Requirements Manual (TRM). Section 7.3 of the TRM establishes the fire brigade manning requirements.

9811020323 981023 PDR ADOCK 05000338