

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

October 6, 1988

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

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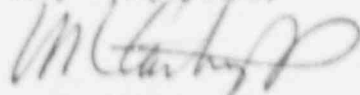
Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
NORTH ANNA POWER STATION UNITS 1 AND 2  
PROPOSED TECHNICAL SPECIFICATION CHANGE - SUPPLEMENT  
REACTOR COOLANT SYSTEM LEAKAGE DETECTION SYSTEM

On July 20, 1988, we submitted a proposed Technical Specification change for North Anna Units 1 and 2 to clarify the requirements of Technical Specification 3.4.6.1 regarding RCS leakage detection systems. We request that the proposed change be treated as an exigent request in accordance with 10CFR50.91(a)(6). The basis for our request is discussed in the enclosure.

If you require additional information or have any questions, please contact us immediately.

Very truly yours,



W. R. Cartwright  
Vic. President - Nuclear

Enclosure

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Mr. J. L. Caldwell  
NRC Senior Resident Inspector  
North Anna Power Station

Commissioner  
Department of Health  
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## BASIS FOR EXIGENT REQUEST

10CFR50.91(a) requires the licensee to explain an exigent request and why it cannot be denied. The regulation also requires NRC to use its normal procedures in determining that the licensee failed to use its best effort to make a timely application for the amendment to create the exigency and take advantage of the procedure. These issues are discussed below.

### Background

On July 20, 1988, Virginia Power submitted a proposed Technical Specifications change, for North Anna Units 1 and 2, to clarify the requirements of Technical Specification 3.4.G.1 regarding RCS leakage detection systems. The limiting condition for operation (LCO) was revised to require 1) the containment atmosphere particulate and gaseous radioactivity monitoring system, and 2) the containment sump level and discharge flow measurement system to be operable.

The current LCO was difficult to understand because it was interpreted to require two leakage detection systems to be operable, whereas the associated action statement was interpreted to require three separate and independent methods to be operable. Regulatory Guide 1.45 requires three separate detection methods of which two of the methods should be 1) the containment particulate radioactivity monitoring system and 2) the containment sump level and discharge flow measurement system. Regulatory Guide 1.45 also requires a third method which is satisfied by the containment gaseous radioactivity monitoring system.

The proposed change clarifies the specification such that the containment particulate and gaseous monitoring systems are considered as two separate detection methods but are not considered as two independent systems. Specifically, the monitors share a common piping system, power supply and piping arrangement that do not make them truly independent. Therefore, the action statement was modified to achieve consistency with the LCO. Specifically, if either of the two required leakage monitoring systems are inoperable, a compensatory leakage measurement using the RCS water inventory balance method is specified instead of obtaining grab samples. The current specification does not require a compensatory leakage measurement if the containment sump discharge measurement system is inoperable whereas the revised specification does. This compensatory leakage measurement along with a fully operable leakage detection system is the basis for extending the action statement from six hours to 30 days when one leakage detection system is inoperable. The surveillance requirements have also been rewritten to require a periodic calibration of the containment sump level monitor.

The proposed Technical Specification changes are consistent with the regulatory position of Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems" and NUREG 0452, "Westinghouse Standard Technical Specifications". Specifically, three separate detection methods are provided but they are grouped as two separate and redundant detection systems. The loss of a single system would not result in the loss of detection capability. Therefore, regulatory position #9 of Regulatory Guide 1.45 is fully met.

### Basis for Request

The action statement of Technical Specification 3.4.6.1 has been entered twice in the last few weeks. On September 22, 1988, the seal on the particulate filter housing was leaking. Because the two monitors share a common piping system, the containment particulate and gaseous monitoring system was declared inoperable. The system was returned to operable status when a temporary seal was put on the filter housing. On October 3, 1988, the purge inlet SOV to the containment particulate and gaseous monitor failed causing the control power fuses to the monitors to blow rendering the system inoperable. The SOV was electrically isolated, the fuses were replaced, and power was restored. The system was returned to service.

In both cases, the current specification require us to enter into a six hour action statement. This action can result in undue pressure on operations and maintenance personnel to conduct troubleshooting/repair activities on a highly accelerated schedule. If the actions are unsuccessful, it can also result in unnecessary challenges to plant systems to respond to an unplanned, rapid rampdown to meet the action statement requirements. The action statement in the proposed specification would permit a 30 day - rather than six hour - period to take appropriate actions for the events described above. Certain compensatory actions are also required.

### Need for Prompt NRC Action

Currently, a temporary seal has been installed on the filter housing. The SOV has been electrically isolated and the fuses were replaced. Additional corrective action appears warranted. For example, further testing of the pump motor seems prudent. However, the current specification effectively discourages such activity by the time constraints imposed.

We believe that a request to process the Technical Specification change in an exigent manner is justified to support maintenance actions that are timely, but not hurried. In addition, until the additional corrective actions can be effectively implemented, the possibility exists that adverse conditions may develop necessitating additional entries into the overly-restrictive action statement.

### Avoiding the Exigent Request

We have considered several alternatives to this exigent request: requesting an emergency TS change, requesting discretionary enforcement, and taking no further action.

Although we consider that the circumstances described above warrant prompt action by NRC, the concern does not meet the criterion in 50.91 for an emergency Technical Specification change in that a plant shutdown or derating is not imminent.

Discretionary enforcement is not appropriate to the circumstances. The current specification can be met, if necessary. This request centers on the recognition that alternatives preferable to promptly shutting down an operating unit are available.

If no exigent action is taken, the proposed Technical Specification would be processed in normal fashion. Other regulatory issues could take priority in NRC's review and approval process. If a situation similar to those discussed above were to disable a sampling method resulting in less than the required number of systems, both we and NRC would again be forced into a reactive mode on a short time frame.

#### Licensee Best Efforts Toward A Timely Application

One alternative to the exigent request not discussed above was our proactive effort in July 1988 to identify and submit for NRC review and approval the clarification of Technical Specification 3.6.4.1. At that time, we believed we were taking appropriate actions that would improve the specifications and prevent the type of occurrence currently being discussed.

We also believe that this request is timely in that we recognize that the possibility exists for additional problems on the RCS leakage detection systems. On two previous occasions, minor problems could have had consequences out-of-proportion with their significance. We believe that this application reflects that recognition and proposes action in a timely manner to preclude recurrence.