VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

June 21, 1989

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D. C. 20555 Serial No. 89-365A NAPS/DLDM:rmh Docket Nos. 50-338 50-339 License Nos. NPF-4 NPF-7

Gentlemen:

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VIRGINIA ELECTRIC AND POWER COMPANY NORTH ANNA POWER STATION UNITS 1 AND 2 ADMINISTRATIVE CHANGE TO AMENDMENT NOS. 116 AND 99

Virginia Electric and Power Company has recieved Amendment Nos. 116 and 99 to Facility Operating License Nos. NPF-4 and NPF-7 issued May 8, 1989 These amendments contain items which are not consistent with technical changes approved by Amendment Nos. 110 and 96 issued December 14, 1988.

License Amendment Nos. 110 and 96 increased the test pressure from 40.6 psig to 44.1 psig. In paragraph 4.6.1.1c, amendments 116 and 99, the gas test pressure P is incorrectly specified as 40.6 psig instead of the already approved value of 44.1 psig.

On page B3/4 6-1, the first sentence in section 3, 4, 5....2, the word "tests" has replaced the word "rates". The sentence show's read "The limitations on containment leakage rates ..."

Based on this information, we request that pages 3/4 6-1 for Units 1 and 2, and page B3/4 6-1 for Unit 1 be re-issued to reflect the approved information. Copies of these change pages are attached. This request is administrative in nature since all technical issues were approved in an earlier amendment. This issue has been discussed with the NRC North Anna Project Manager, Mr. Leon Engle.

Should you have any questions, please contact us at your earliest convenience.

Very truly yours,

W. L. Stewart

Senior Vice President + Power

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Attachments:

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- Proposed Technical Specification Changes for North Anna Unit 1
 Proposed Technical Specification Changes for North Anna Unit 2
- cc: U. S. Nuclear Regulatory Commission 101 Marietta Street, N. W. Suite 2900 Atlanta, Georgia 30323

Mr. J. L. Caldwell NRC Senior Resident Inspector North Anna Power Station ATTACHMENT 1

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PROPOSED TECHNICAL SPECIFICATIONS CHANGES FOR NORTH ANNA UNIT 1

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

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Without primary CONTAINTMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except as provided in Table 3.6-1 of Specification 3.6.3.1, and
- b. By verifying that each containment air lock is OPERABLE per Specification 3.6.1.3.
- c. After each closing of the equipment hatch, by leak rate testing the equipment hatch seals with gas at P, greater than or equal to 44.1 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Specification 4.6.1.2.d for all other Type B and C penetrations, the combined leakage rate is less than or equal to 0.60 L.
- d. Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line.

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^{*}Except valves, blind flanges and deactivated automatic valves which are located inside the containment and are locked sealed or otherwise sealed in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such verification need not be performed more often than once per 92 days.

3/4.6 CONTAINMENT SYSTEMS

BASES

3/4.6.1 CONTAINMENT

3/4.6.1.1 CONTAINMENT INTEGRITY

CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the accident analyses. This restriction, in conjunction with the leakage rate limitation, will limit the site boundary radiation doses to within the limits of 10 CFR 100 during accident conditions.

Leakage integrity tests in the containment purge lines and the containment vacuum ejector system lines is to identify excessive degradation of the resilient seats of these valves. These tests will be performed in addition to the Type C tests required by 10 CFR Part 50, Appendix J and will not relieve the responsibility to conform with Appendix J.

3/4.6.1.2 CONTAINMENT LEARAGE

The limitations on containment leakage rates ensure that the total containment leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure, P. As an added conservatism, the measured overall integrated leakage rate^a is further limited to ≤ 0.75 L during performance of the periodic test to account for possible degradation of the containment leakage barriers between leakage tests.

The surveillance testing for measuring leakage rates are consistent with the requirements of Appendix "J" of 10 CFR 50. Due to the increased accuracy of the mass-point method for containment integrated leakage testing, the mass-point method referenced in ANSI/ANS 56.8-1987 can be used in lieu of the methods described in ANSI N45.4-1972.

6.1.3 CONTAINMENT AIR LOCKS

limitations on closure and leak rate for the containment air locks are required to meet the restrictions on CONTAINMENT INTEGRITY and containment leak rate. Surveillance testing of the air lock seals provides assurance that the overall air lock leakage will not become excessive due to seal damage during the intervals between air lock leakage tests.

3/4.6.1.4 and 3/4.6.1.5 INTERNAL PRESSURE AND TEMPERATURE

The limitations on containment internal pressure and average air temperature ensure that

 The containment pressure is prevented from reaching the containment lower design pressure of 5.5 psia for an inadvertent containment spray actuation, ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATIONS CHANGES FOR NORTH ANNA UNIT 2

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3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

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Without primary CONTAINTMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except as provided in Table 3.6-1 of Specification 3.6.3.1, and
- b. By verifying that each containment air lock is OPERABLE per Specification 3.6.1.3.
- c. After each closing of the equipment hatch, by leak rate testing the equipment hatch seals with gas at P, preater than or equal to 44.1 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Specification 4.6.1.2.d for all other Type B and C penetrations, the combined leakage rate is less than or equal to 0.60 L.
- d. Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line.

NORTH ANNA - UNIT 2

^{*}Except valves, blind flanges and deactivated automatic valves which are located inside the containment and are locked sealed or otherwise sealed in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such verification need not be performed more often than once per 92 days.