

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 21, 1999

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 99-549A
NL&OS/ETS R0
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
TECHNICAL SPECIFICATION CHANGE, RELOCATION OF
WASTE GAS CHARCOAL FILTER SYSTEM TO
TECHNICAL REQUIREMENTS MANUAL

In an October 28, 1999 letter (Serial No. 99-549), Virginia Electric and Power Company requested amendments, in the form of changes to the Technical Specifications and to Facility Operating License Numbers NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively. The proposed changes requested the relocation of the operability and surveillance requirements of Technical Specifications Section 3/4.6.4.3, "Waste Gas Charcoal Filter System" from the Technical Specifications to the Technical Requirements Manual (TRM). In a December 10, 1999 telephone conference call with the NRC staff to discuss the proposed changes, additional justification was requested to support the relocation of the subject Technical Specifications to the TRM.

The proposed Technical Specifications changes have been evaluated against the criteria of 10 CFR 50.36 and it has been determined that the proposed changes do not meet any of the 10 CFR 50.36 criteria for inclusion in the Technical Specifications as discussed below:

- The Waste Gas Charcoal Filter System and its limits are not associated with installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Waste Gas Charcoal Filter System limits do not satisfy Criterion 1.
- The Waste Gas Charcoal Filter System and its limits are not associated with a process variable that is an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Waste Gas Charcoal Filter System, limits do not satisfy Criterion 2.

ADD1

PP2 ADDOK 05000 '338

- The Waste Gas Charcoal Filter System is not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Waste Gas Charcoal Filter System limits do not satisfy Criterion 3.
- The Waste Gas Charcoal Filter System is not a structure, system, or component which operating experience or probabilistic risk assessment (PRA) has shown to be significant to public health and safety. The Waste Gas Charcoal Filter System is not important in any of the scenarios modeled in the North Anna Power Station site-specific PRAs. The Waste Gas Charcoal Filter System does not meet Criterion 4.

Since the criteria of 10 CFR 50.36(c)(2)(ii) do not apply, the Waste Gas Charcoal Filter System limiting condition for operation and associated applicability, actions, and surveillances may be relocated from the Technical Specifications to the TRM.

There are no new commitments made in this letter. If you have any further questions, please contact us.

Very truly yours,



D. A. Christian
Vice President – Nuclear Operations

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COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by David A. Christian, who is Vice President - Nuclear Operations, of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 21st day of December, 1999.

My Commission Expires: 3/31/2000.



Notary Public

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