

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 11, 2000

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Serial No. 00-606
CM/RAB
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
PROPOSED TECHNICAL SPECIFICATION CHANGES
IMPROVED TECHNICAL SPECIFICATIONS

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company (Dominion) requests amendments, in the form of changes to the Technical Specifications to Facility Operating Licenses Numbers NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively. The proposed changes will revise the North Anna current Technical Specifications to be consistent with NUREG-1431, "Standard Technical Specifications – Westinghouse Plants," Revision 1, and certain generic changes to the NUREG. The guidance of NEI 96-06, "Improved Standard Technical Specifications Conversion Guidance," dated August 1996, and NRC Administrative Letter 96-04, "Efficient Adoption of Improved Standard Technical Specifications," dated October 9, 1996, were used in preparing this submittal.

The detailed description and justification for this proposed license amendment are provided in the volumes attached to this letter. The following attachments are included to assist in the review and approval of this submittal:

Attachment 1, "Content of the North Anna ITS Submittal," which describes the organization and content of the submittal.

Attachment 2, "Disposition of Existing License Amendment Requests," which provides the status of the incorporation of currently docketed license amendment requests into this license amendment request.

Attachment 3, "Disposition of Generic Changes to NUREG-1431," which lists the pending and approved changes to NUREG-1431, as of November 1, 2000. The list summarizes the disposition of each of these changes in the North Anna license amendment request.

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Rec'd at
NRC DCD
on 12/16/00
by pm.

Attachment 4, "Differences from NUREG and Current Technical Specifications," which summarizes those changes incorporated into this license amendment request that are different from both the current Technical Specifications (as modified by existing license amendment requests) and NUREG-1431.

Dominion is in the process of resolving a generic issue with the Nuclear Steam Supply System vendor and the industry. The issue involves the inappropriate application of analyses to justify extending allowed outage times, surveillance frequencies, and allowed bypass times for three functions in the North Anna ITS. At this time, it appears that the ITS will not be affected by the resolution of the issue. However, the ITS Bases may require revision to correct the justifications for the times allowed in the ITS. If any revisions are required, they will be provided in a supplement to this license amendment request.

The implementation of this license amendment request will require the performance of a number of new or revised surveillance requirements. For the purpose of defining initial compliance, Dominion intends to treat these new or revised surveillance requirements as being "met" at the time of implementation. The first performance of these new surveillance requirements will be scheduled to be completed within the required interval of the new or revised surveillance as initiated from the date of ITS implementation.

North Anna plans to implement ITS in June 2002. The planned implementation date will be between the Unit 1 Fall 2001 and the Unit 2 Fall 2002 refueling outages. The actual implementation date will depend on the date of NRC approval, training schedules for both licensed and non-licensed operators, the time required for procedure revisions, and the actual refueling outage schedule. The actual implementation date will be determined after discussion with the NRC.

We have evaluated the significant hazards considerations and have determined that the proposed Technical Specifications changes do not constitute a significant hazards consideration as defined in 10 CFR 50.92. The basis for our determination that the changes do not involve a significant hazards consideration is provided in the volumes attached to this letter. The proposed Technical Specifications include increases in the allowed outage times for certain equipment and allow Mode changes with certain equipment inoperable. Therefore, we have evaluated the submittal against the criteria of 10 CFR 50.59, and determined that it results in an unreviewed safety question, and is subject to NRC review and approval.

We have determined that operation with the proposed changes will not result in any significant increases in the amounts of effluents that may be released offsite and in any significant increases in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed changes.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "David A. Christian". The signature is fluid and cursive, with a prominent initial "D" and a long horizontal stroke at the end.

David A. Christian
Senior Vice President and
Chief Nuclear Officer

Attachments:

Attachment 1	"Content of the North Anna ITS Submittal"
Attachment 2	"Disposition of Existing License Amendment Requests"
Attachment 3	"Disposition of Generic Changes to NUREG-1431"
Attachment 4	"Differences from NUREG and Current Technical Specifications"

Commitments made in this letter:

None

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Content of the North Anna ITS Submittal

The submittal for the conversion of the current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) for North Anna Power Station Units 1 and 2 (NAPS) consists of the submittal letter with its four attachments, and one enclosure. The enclosure is contained in 21 volumes. The content of each volume is summarized below:

Volume	Title
1	Submittal Letter, including Attachments CTS to ITS Cross Reference Index ITS to CTS Cross Reference Index
2	Complete Set of Unit 1 Marked Up CTS Pages in CTS Order
3	Complete Set of Unit 2 Marked Up CTS Pages in CTS Order
4	ITS Chapter 1.0, Use and Application
5	ITS Chapter 2.0, Safety Limits
6	ITS Chapter 3.0, Limiting Condition for Operation (LCO) Applicability and Surveillance Requirement (SR) Applicability
7	ITS Section 3.1, Reactivity Control Systems
8	ITS Section 3.2, Power Distribution Limits
9 & 10	ITS Section 3.3, Instrumentation
11 & 12	ITS Section 3.4, Reactor Coolant System (RCS)
13	ITS Section 3.5, Emergency Core Cooling Systems (ECCS)
14	ITS Section 3.6, Containment Systems
15 & 16	ITS Section 3.7, Plant Systems
17 & 18	ITS Section 3.8, Electrical Power Systems
19	ITS Section 3.9, Refueling Operations
20	ITS Chapter 4.0, Design Features
21	ITS Chapter 5.0, Administrative Controls

The information in Volumes 1 through 3 is provided to assist the NRC in the review and approval of Volumes 4 through 21. Below is a brief description of the content of each of the volumes in this submittal.

Volume 1

The contents of Attachments 1 through 4 of the submittal letter are described in the letter.

Volume 1 also includes two cross-reference indices. One index provides a cross reference from CTS to ITS, in CTS alpha-numeric order. The other index provides a cross reference from ITS to CTS, in ITS alpha-numeric order.

Volumes 2 and 3

Volumes 2 and 3 contain copies of the Unit 1 and Unit 2 CTS pages that have been annotated to show the differences between the CTS and the NAPS ITS. These volumes are organized in CTS page order and have been prepared to facilitate NRC review efforts. They also demonstrate that all CTS requirements have been appropriately dispositioned. In many instances, the same CTS page is used in different ITS sections. As a result, in these compiled volumes, the CTS pages that are included in more than one ITS package will appear for each ITS package in which it was used. Each page will be annotated with the number of the ITS package in which that CTS page appears.

Volumes 4 through 21

Volumes 4 through 21 provide the detailed description and justification for this proposed license amendment. Each of these volumes (or set of volumes for Sections 3.3, 3.4, 3.7, and 3.8) corresponds to a chapter or section of NUREG-1431. Each volume (or set of volumes) contains the required information to review the conversion to ITS. The information for each chapter or section is organized as follows:

ITS

The ITS portion of each chapter or section contains the clean, typed proposed ITS for NAPS. The proposed ITS were derived by incorporating the NUREG-1431 mark-up information.

ITS Bases

The ITS Bases portion contains the clean, typed proposed ITS Bases for that chapter or section. The proposed ITS Bases were derived by incorporating the NUREG-1431 Bases mark-up information.

NUREG-1431 Mark-Up and Justifications for Deviations (JFDs)

This portion contains a mark-up of NUREG-1431 and Justifications for Deviations (JFDs) from the NUREG. NUREG-1431 is annotated to identify the differences between the NUREG and the NAPS ITS. The left-hand margin of the mark-up also includes a cross-reference to the equivalent NAPS CTS requirement. Each difference from the NUREG is annotated with a numeric designator on the NUREG page. The designator corresponds to a JFD, which provides the justification for the difference. The JFDs are located directly following the associated mark-up for each chapter (for Chapters 1.0, 2.0, 3.0, 4.0, and 5.0) or specification (for the remaining volumes). The NUREG mark-up also shows the incorporation of approved generic changes (Technical Specification Task Force [TSTF] change travelers) that are applicable to the ITS.

NUREG-1431 Bases Mark-Up and Justifications for Deviations (JFDs)

This portion contains a mark-up of the NUREG-1431 Bases and Justifications for Deviations (JFDs) from the NUREG Bases. The NUREG-1431 Bases are annotated to identify the differences between the NUREG Bases and the NAPS ITS Bases. Each difference from the NUREG Bases is annotated with a numeric designator on the NUREG page. The designator corresponds to a JFD, which provides the justification for the difference. The JFDs are located directly following the associated mark-up for each chapter (for Chapters 2.0 and 3.0) or specification (for the remaining volumes). The NUREG mark-up also shows the incorporation of approved generic changes (Technical Specification Task Force [TSTF] change travelers) that are applicable to the Bases.

CTS Mark-Up and Discussions of Changes (DOCs)

This portion contains a mark-up of the CTS and the Discussions of Changes (DOCs) from the CTS. The incorporation of outstanding CTS License Amendment Requests docketed as of November 15, 2000 is provided in Attachment 2 of this letter.

The CTS are annotated to identify the differences between the CTS and the NAPS ITS. The left-hand margin of the mark-up also includes a cross-reference to the equivalent ITS requirement. The pages are arranged in ITS order. The upper right hand corner of the CTS page is annotated with the ITS number to which it applies. Items on the CTS page that are addressed in other proposed ITS chapters or specifications are annotated with a reference to the appropriate chapter or specification.

Each proposed ITS requirement that differs from a CTS requirement is annotated with an alphanumeric designator on the CTS page. The designator corresponds to a DOC, which provides the justification for the change. The DOCs are located directly following the associated mark-up for each chapter (for Chapters 1.0, 2.0, 3.0, 4.0, and 5.0) or specification (for the remaining volumes).

Each proposed change to the CTS is classified into one of the following categories:

Designator	Category
A	ADMINISTRATIVE - Changes to the CTS that do not result in new requirements or change operational restrictions or flexibility. These changes are supported in aggregate by a single No Significant Hazards Consideration (NSHC).
M	MORE RESTRICTIVE - Changes to the CTS that result in added restrictions or reduced flexibility. These changes are supported in aggregate by a single NSHC.
L	LESS RESTRICTIVE - Changes to the CTS that result in reduced restrictions or added flexibility. These changes are supported either in aggregate by an NSHC that addresses a

- particular category of Less Restrictive change, or by a specific NSHC if the change does not fall into one of the eight categories of Less Restrictive changes.
- LA LESS RESTRICTIVE – REMOVAL OF DETAIL – Changes to the CTS that eliminate detail and relocate the detail to a licensee controlled document. Typically, this involves details of system design and function, or procedural detail on methods of conducting a surveillance. These changes are supported in aggregate by a single NSHC.
- R RELOCATED SPECIFICATIONS – Changes to the CTS that relocate the requirements that do not meet the selection criteria of 10 CFR 50.36(c)(2)(ii). These changes are supported in aggregate by a single NSHC.

The DOCs are numbered sequentially within each letter category for each ITS chapter or specification.

The CTS Bases pages are replaced in their entirety by the proposed NAPS ITS Bases.

No Significant Hazards Considerations (NSHCs)

This portion contains the evaluations required by 10 CFR 50.91(a), which support a finding of No Significant Hazards Consideration (NSHC). Based on the inherent similarities in the NSHC evaluations, generic evaluations for a finding of NSHC have been written for the following categories of CTS changes:

- Administrative
- More Restrictive
- Relocated
- Less Restrictive – Removal of Detail
- Less Restrictive – Category 1 - Relaxation of LCO Requirements
- Less Restrictive – Category 2 - Relaxation of Applicability
- Less Restrictive – Category 3 - Relaxation of Completion Time
- Less Restrictive – Category 4 - Relaxation of Required Action
- Less Restrictive – Category 5 - Deletion of Surveillance Requirement
- Less Restrictive – Category 6 - Relaxation of Surveillance Requirement
Acceptance Criteria
- Less Restrictive – Category 7 - Relaxation of Surveillance Frequency
- Less Restrictive – Category 8 - Deletion of Reporting Requirements

For those less restrictive changes that do not fall into one of the generic Less Restrictive categories, a specific NSHC evaluation has been performed. Each evaluation is annotated to correspond to the DOC discussed in the NSHC.

Also, this license amendment request has been evaluated against the criteria for and identification of licensing and regulatory actions requiring environmental assessment

in accordance with 10 CFR 51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10 CFR 51.22(c)(9). The Environmental Assessment, which is part of this portion of the submittal, discusses how the proposed Technical Specification changes meet the criteria for categorical exclusion.

Disposition of Existing License Amendment Requests

Date	Dominion Letter/TAC Numbers	Description of Change	Affected ITS	Affected CTS Pages	Disposition
6/22/00	SN 00-305 SN 00-556	Boron Concentration Increases in the Refueling Water Storage Tank, Casing Cooling Tank, Safety Injection Accumulators, and Spent Fuel Pool	3.5 3.6 3.9 COLR	Unit 1: 3 /4-1-15 3 /4-1-16 3 /4-5-1 3 /4-5-9 3 /4-6-12 3 /4-9-1 Unit 2: 3 /4-1-13 3 /4-1-14 3 /4-5-1 3 /4-5-10 3 /4-6-11 3 /4-9-1	Proposed changes will be incorporated in ITS submittal when approved by NRC.
6/22/00	SN 00-306	Extend cumulative core burnup applicability limits for Reactor Coolant System Pressure/ Temperature Limits, LTOPS setpoints, and T _{enable} values.	3.4	Units 1 & 2: 3 /4-4-27 3 /4-4-28	Proposed changes will be incorporated in ITS submittal when approved by NRC.

Disposition of Existing License Amendment Requests

Date	Dominion Letter/TAC Numbers	Description of Change	Affected ITS	Affected CTS Pages	Disposition
6/22/00	SN 00-307	Revise license to permit elimination of assumed increase in rod control cluster assembly drop time resulting from concurrent trip and seismic event when determining if measured rod drop times meet Tech Spec limits	N/A	N/A	The proposed changes only affect the CTS Bases. Therefore, the ITS submittal is not affected by this license amendment request.
9/27/00	SN 00-491	1) Increase fuel enrichment limit to 4.6 weight percent U ²³⁵ ; 2) establish LCOs for Spent Fuel Pool boron concentration and fuel storage restrictions; and 3) eliminate value for allowance for uncertainties in the calculation for K _{eff} in the SFP criticality	3.7 4.0	Unit 1: 3 /4-7-75 (new) 3 /4-7-76 (new) 5-4 5-5 Unit 2: 3 /4-7-59 (new) 3 /4-7-60 (new) 5-4 5-5	Proposed changes will be incorporated in ITS submittal when approved by NRC.
	SN 00-609	1) Revise differential pressure limit associated with Control Room Emergency Ventilation System Filters; and 2) increase number of compressed air bottles for Control Room Bottled Air System	3.7 5.0	Unit 1: 3 /4-7-22 3 /4-7-23 Unit 2: 3 /4-7-19 3 /4-7-20	Proposed changes have been incorporated in ITS submittal.

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
WOG-142, Rev. 0	Clarifying SR 3.0.1 to state that Surveillance can be performed in steps	Under TSTF Consideration	Incorporated
TSTF-1, Rev. 1	Make LCO 3.0.5 applicable to variables in addition to systems and equipment	Rejected by NRC	Not Incorporated
TSTF-2, Rev. 1	Relocate the 10 year sediment cleaning of the fuel oil storage tank to licensee control	Approved by NRC	Incorporated
TSTF-3, Rev. 1	Relocate references to thyroid dose conversion factors to the Bases	Rejected by NRC	Not Incorporated
TSTF-4, Rev. 1	Move the PORV lift settings and the enable temperature to the PTLR	Rejected by NRC	Not Incorporated
TSTF-5, Rev. 1	Delete safety limit violation notification requirements	Approved by NRC	Incorporated
TSTF-6, Rev. 1	Add Exception for LCO 3.0.7 to LCO 3.0.1	Approved by NRC	Incorporated
TSTF-7, Rev. 1	Delete the 1 hour time limit to begin reducing power from LCO 3.0.3	Withdrawn by TSTF	Not Incorporated
TSTF-8, Rev. 2	Revise the SR 3.0.1 Bases to allow credit for unplanned events to meet any Surveillance	Approved by NRC	Incorporated
TSTF-9, Rev. 1	Relocate value for shutdown margin to COLR	Approved by NRC	Incorporated
TSTF-10, Rev. 1	Revise the Control Rod LCOs Applicability from Mode 2 to Mode 2 with $K_{eff} \geq 1.0$	Rejected by NRC	Not Incorporated
TSTF-11, Rev. 1	Delete "All" from LCO 3.1.5, "Rod Group Alignment Limits"	Rejected by NRC	Not Incorporated
TSTF-12, Rev. 1	Delete LCO 3.1.9 and 3.1.11 (Physics Tests Exceptions)	Approved by NRC	Incorporated
TSTF-13, Rev. 1	Move SR for 300 ppm MTC measurement to Frequency Note of SR 3.1.4.3	Approved by NRC	Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-14, Rev. 4	Add an LCO item and SR to Mode 2 Physics Tests Exceptions to verify that Thermal Power \leq 5% RTP.	Approved by NRC	Incorporated
TSTF-15, Rev. 1	Correct error in Bases for LCO 3.1.5	Approved by NRC	Incorporated
TSTF-16, Rev. 4	Add Action to LCO 3.8.9 to require entry into LCO 3.0.3 when there is a loss of function	Approved by NRC	Incorporated
TSTF-17, Rev. 2	Extension of testing frequency of containment airlock interlock mechanism from 184 days to 24 months	Approved by NRC	Incorporated
TSTF-18, Rev. 1	Require only one [secondary] containment access door per access opening to be closed	Approved by NRC	Not Incorporated. Not Applicable to North Anna¹
TSTF-19, Rev. 1	Relocate the details of RTD and thermocouple calibration from the Channel Calibration definition	Approved by NRC	Incorporated
TSTF-20, Rev. 0	Delete extraneous Action from Refueling Cavity Water Level	Approved by NRC	Incorporated
TSTF-21, Rev. 1	Make RHR - Low Water Level Surveillances consistent between PWR NUREGs	Rejected by NRC	Not Incorporated
TSTF-22, Rev. 0	Bracket the flow rate requirement in the RHR SR as some plants do not assume a specific flow rate.	Rejected by NRC	Not Incorporated
TSTF-23, Rev. 3	Bracket NUREG-1431 LCO 3.9.2, Unborated Water Source Isolation Valves	Approved by NRC	Not Incorporated. Not Applicable to North Anna²

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-24, Rev. 1	Delete the details on updating the target flux difference.	Approved by NRC	Not Incorporated. Not Applicable to North Anna³
TSTF-25, Rev. 0	Revise the Actions terminology regarding QPTR to match the Actions being taken	Rejected by NRC	Not Incorporated
TSTF-26, Rev. 0	Revise the Action for Minimum Temperature for Criticality to match the Applicability	Approved by NRC	Incorporated
TSTF-27, Rev. 3	Revise SR frequency for Minimum Temperature for Criticality	Approved by NRC	Incorporated
TSTF-28, Rev. 0	Delete unnecessary Action to measure gross specific activity	Approved by NRC	Incorporated
TSTF-29, Rev. 0	Remove Mode 4 when S/Gs are relied upon from the Modes of Applicability	Rejected by NRC	Not Incorporated
TSTF-30, Rev. 3	Extend the Completion Time for inoperable isolation valve to a closed system to 72 hours	Approved by NRC	Incorporated
TSTF-36, Rev. 4	Addition of LCO 3.0.3 N/A to shutdown electrical power specifications	Approved by NRC	Not Incorporated⁴
TSTF-37, Rev. 2	Diesel Generator Surveillance Changes Based on Generic Letter 94-01 and the Maintenance Rule	Approved by NRC	Incorporated
TSTF-38, Rev. 0	Revise visual surveillance of batteries to specify inspection is for performance degradation	Approved by NRC	Incorporated
TSTF-39, Rev. 1	Allow CFTs to be performed by sequential, overlapping or total channel steps	Withdrawn by TSTF	Not Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-44, Rev. 0	Add a note to the Containment Isolation Valve LCO which exempts MSSVs, MSIVs, MFIV, MFRVs, and ADVs	Rejected by NRC	Not Incorporated
TSTF-45, Rev. 2	Exempt verification of CIVs that are not locked, sealed or otherwise secured	Approved by NRC	Incorporated
TSTF-46, Rev. 1	Clarify the CIV surveillance to apply only to automatic isolation valves	Approved by NRC	Incorporated
TSTF-51, Rev. 2	Revise containment requirements during handling irradiated fuel and core alterations	Approved by NRC	Incorporated
TSTF-52, Rev. 3	Implement 10 CFR 50, Appendix J, Option B	Approved by NRC	Incorporated
TSTF-54, Rev. 1	Operational Leakage TS Bases changed to be consistent with the Identified Leakage definition	Approved by NRC	Incorporated
TSTF-60, Rev. 0	Make LCO 3.0.4 applicable to all actions of TS 3.4.15	Approved by NRC	Incorporated
TSTF-61, Rev. 0	Added statement clarifying the intent of the RCS water inventory balance surveillance	Approved by NRC	Incorporated
TSTF-64, Rev. 0	Clarification of applicability of Channel Calibration and Channel Functional Test	Withdrawn by TSTF	Not Incorporated
TSTF-65, Rev. 1	Use of generic titles for utility positions	Approved by NRC	Partially Incorporated⁵
TSTF-68, Rev. 2	Containment Personnel Airlock Doors Open During Fuel Movement	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁴

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-70, Rev. 1	Fuel Storage Pool Verification	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁶
TSTF-71, Rev. 2	Add example of SFDP to the 3.0.6 Bases	Approved by NRC	Incorporated
TSTF-86, Rev. 0	Delete overtime requirements in Section 5.0	Rejected by NRC	Not Incorporated
TSTF-87, Rev. 2	Revise "RTBs open" & "CRDM de-energized" Actions to "incapable of rod withdrawal"	Approved by NRC	Incorporated
TSTF-88, Rev. 0	Number of Required Reactor Vessel Head Closure Bolts	Withdrawn by TSTF	Not Incorporated
TSTF-89, Rev. 0	Change to Frequency of SR 3.1.8.1	Approved by NRC	Not Incorporated. Not Applicable to North Anna¹⁶
TSTF-90, Rev. 1	Add a Note to LCO 3.5.3 that allows RHR to be Operable as ECCS when aligned for decay heat removal	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁷
TSTF-91, Rev. 1	Relocate the trip setpoints and allowable values for loss of voltage and undervoltage to the Bases	Rejected by NRC	Not Incorporated
TSTF-92, Rev. 1	Revise the Containment Purge and Exhaust SR to exempt valves that are locked, sealed or secured	Withdrawn by TSTF	Not Incorporated
TSTF-93, Rev. 3	Change the frequency of pressurizer heater testing from 92 days to [18] months	Approved by NRC	Incorporated
TSTF-94, Rev. 1	Remove number of required pressurizer heater groups from Pressurizer LCO	Approved by NRC	Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-95, Rev. 0	Revise completion time for reducing Power Range High trip setpoint from 8 to 72 hours	Approved by NRC	Incorporated
TSTF-96, Rev. 1	Delete the initial performance of the boron concentration measurement with no source range detectors	Approved by NRC	Incorporated
TSTF-97, Rev. 0	Revise Note to SR 3.2.1.2, Fq measurement	Approved by NRC	Incorporated
TSTF-98, Rev. 2	Relocate the Fq(z) penalty factor to the COLR	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁸
TSTF-99, Rev. 0	Extend the Completion Time for Fq(w) not within limits from 2 hours to 4 hours	Approved by NRC	Incorporated
TSTF-100, Rev. 0	Revise ADV Action B to state "Restore All But One ADV to Operable Status"	Approved by NRC	Incorporated
TSTF-101, Rev. 0	Change AFW pump testing frequency to be "In accordance with the Inservice Testing Program"	Approved by NRC	Incorporated
TSTF-102, Rev. 0	Extend the periodic verification of inoperable MSIV and MFIV closure to 31 days	Rejected by NRC	Not Incorporated
TSTF-103, Rev. 1	Add bracketed information to LCO 3.0.4 inappropriately deleted by Rev. 0 Change BWR-26	Rejected by NRC	Not Incorporated
TSTF-104, Rev. 0	Relocates discussion of exceptions from LCO 3.0.4 to the Bases	Approved by NRC	Incorporated
TSTF-105, Rev. 1	Remove the details of performing an RCS flow measurement	Rejected by NRC	Not Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-106, Rev. 1	Change to Diesel Fuel Oil Testing Program	Approved by NRC	Incorporated
TSTF-107, Rev. 4	Separate control rods that are untrippable versus inoperable	Approved by NRC	Incorporated
TSTF-108, Rev. 1	Eliminate the 12 hour COT on power range and intermediate range channels for Physics Test Exceptions	Approved by NRC	Incorporated
TSTF-109, Rev. 0	Clarify the QPTR surveillances	Approved by NRC	Incorporated
TSTF-110, Rev. 2	Delete SR frequencies based on inoperable alarms	Approved by NRC	Incorporated
TSTF-111, Rev. 6	Revise Bases for SRs 3.3.1.16 and 3.3.2.10 to eliminate pressure sensor response time testing	Approved by NRC	Partially Incorporated¹⁵
TSTF-112, Rev. 1	Revise Condition D in Tech Spec 3.2.3.A	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁹
TSTF-113, Rev. 4	Eliminate Shutdown to MODE 4 for inoperable PORVs	Rejected by NRC	Not Incorporated
TSTF-114, Rev. 0	Revise Bases for 3.4.7 to address DHR via natural circulation	Approved by NRC	Incorporated
TSTF-115, Rev. 0	Battery Float Current and Battery Inspection Program	Withdrawn by TSTF	Not Incorporated
TSTF-116, Rev. 2	RCS Inventory Balance SR: Steady State Clarification	Approved by NRC	Incorporated
TSTF-117, Rev. 0	Revise Accumulator Pressure Reference from Pressurizer to RCS	Approved by NRC	Incorporated
TSTF-118, Rev. 0	Administrative Controls Program Exceptions	Approved by NRC	Incorporated
TSTF-119, Rev. 0	Delete Fire Protection Program Implementation from Administrative Controls	Rejected by NRC	Not Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-120, Rev. 0	Simplify Fuel Oil Sampling	Rejected by NRC	Not Incorporated
TSTF-121, Rev. 0	Remove Regulatory Duplication from Shift Manning Requirements	Withdrawn by TSTF	Not Incorporated
TSTF-122, Rev. 0	Revise LCO 3.0.2 Bases to Remove Possible Confusion	Approved by NRC	Incorporated
TSTF-135, Rev. 3	3.3 - RPS and ESFAS Instrumentation	Approved by NRC	Incorporated
TSTF-136, Rev. 0	Combine LCO 3.1.1 and 3.1.2	Approved by NRC	Incorporated
TSTF-137, Rev. 0	Relocation of the 3.4.16 Action Note A Bases	Approved by NRC	Incorporated
TSTF-138, Rev. 0	Addition of Action for Inoperable Steam Generator	Rejected by NRC	Not Incorporated
TSTF-139, Rev. 1	Correct Criteria Defined in B3.7.16	Approved by NRC	Incorporated
TSTF-140, Rev. 0	Correct Condensate Storage Tank LCO and Criteria	Approved by NRC	Incorporated
TSTF-142, Rev. 0	Increase the Completion Time When the Core Reactivity Balance is Not Within Limit	Approved by NRC	Incorporated
TSTF-145, Rev. 1	Add Action to Verify Flow Path is Isolated When 2 CIVs Inoperable	Withdrawn by TSTF	Not Incorporated
TSTF-151, Rev. 1	PORV Operability Clarification	Approved by NRC	Incorporated
TSTF-152, Rev. 0	Revise Reporting Requirements to be Consistent with 10 CFR 20	Approved by NRC	Incorporated
TSTF-153, Rev. 0	Clarify Exception Notes to be Consistent with the Requirement Being Excepted	Approved by NRC	Partially Incorporated¹⁷
TSTF-154, Rev. 2	Revise Criteria Discussions of Special Test Exceptions	Approved by NRC	Incorporated
TSTF-155, Rev. 0	3.5.1 Core Flood Tanks- Deletion of Condition D and Modification of Condition C	Withdrawn by TSTF	Not Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-161, Rev. 1	SI Reference Applicability	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁶
TSTF-162, Rev. 0	Maximum pressurizer water level limit bases	Approved by NRC	Incorporated
TSTF-163, Rev. 2	Minimum vs. Steady State Voltage and Frequency	Approved by NRC	Incorporated
TSTF-164, Rev. 0	AFD Notes Rearranged	Approved by NRC	Not Incorporated. Not Applicable to North Anna³
TSTF-165, Rev. 0	Revise the LCO 3.0.5 Bases to Refer to Testing and Not SRs	Approved by NRC	Incorporated
TSTF-166, Rev. 0	Correct Inconsistency Between LCO 3.0.6 and the SFDP Regarding Performance of an Evaluation	Approved by NRC	Incorporated
TSTF-167, Rev. 0	High Radiation Area – “Unauthorized” Changed to “Inadvertent”	Rejected by NRC	Not Incorporated
TSTF-168, Rev. 0	RTB Maintenance	Withdrawn by TSTF	Not Incorporated
TSTF-169, Rev. 1	Delete Condition 3.3.1.N	Approved by NRC	Incorporated
TSTF-173, Rev. 0	Delete incorrect Bases statement regarding I-131 equilibrium	Approved by NRC	Incorporated
TSTF-174, Rev. 0	Add missing Bases for 3.7.6, Actions A.1 and A.2	Approved by NRC	Incorporated
TSTF-196, Rev. 0	Revise isolation devices to include ASME/ANSI equivalent methods	Rejected by NRC	Not Incorporated
TSTF-197, Rev. 2	Require containment closure when shutdown cooling requirements are not met.	Approved by NRC	Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-198, Rev. 0	Specification 3.8.6 - Unlimited use of battery charging current in lieu of specific gravity	Withdrawn by TSTF	Not Incorporated
TSTF-199, Rev. 0	3.8.4 - Delete maintenance Surveillances	Withdrawn by TSTF	Not Incorporated
TSTF-200, Rev. 0	Unlimited use of battery modified performance discharge test	Withdrawn by TSTF	Not Incorporated
TSTF-201, Rev. 0	Omit battery "conditional evaluations" from SR 3.8.6.2	Withdrawn by TSTF	Not Incorporated
TSTF-202, Rev. 0	Revise battery Surveillance weekly Frequencies	Withdrawn by TSTF	Not Incorporated
TSTF-203, Rev. 0	Add Bases for 3.8.6 Actions Note	Withdrawn by TSTF	Not Incorporated
TSTF-204, Rev. 3	Revise DC Sources - Shutdown and Inverters - Shutdown to Address Specific Subsystem Requirements	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁴
TSTF-205, Rev. 3	Revision of Channel Calibration, Channel Functional Test, and Related Definitions	Approved by NRC	Partially Incorporated¹⁸
TSTF-207, Rev. 5	Completion Time for Restoration of Various Excessive Leakage Rates	Approved by NRC	Not Incorporated. Not Applicable to North Anna¹⁰
TSTF-233, Rev. 0	Relocate LTOP Arming Temperature to PTLR	Approved by NRC	Not Incorporated. Not Applicable to North Anna¹¹
TSTF-234, Rev. 1	Add Action for More Than One [D]RPI Inoperable	Approved by NRC	Incorporated
TSTF-235, Rev. 1	MSSV Changes	Approved by NRC	Incorporated
TSTF-236, Rev. 0	Seal Injection Flow 72 Hour Completion Time	Rejected by NRC	Not Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-237, Rev. 1	Relaxation of Reactor Coolant Pump Flywheel Examinations	Approved by NRC	Incorporated
TSTF-238, Rev. 0	Correct control bank insertion limits action for applicable mode	Approved by NRC	Incorporated
TSTF-239, Rev. 0	Correct shutdown bank insertion limits applicability	Approved by NRC	Incorporated
TSTF-240, Rev. 0	Eliminate unnecessary Actions to restore compliance with the LCO	Under NRC Consideration	Incorporated
TSTF-241, Rev. 4	Allow time for stabilization after reducing power due to QPTR out of limit	Approved by NRC	Incorporated
TSTF-242, Rev. 1	Increase the time to perform a COT on Power Range and Intermediate Range Instruments	Approved by NRC	Incorporated
TSTF-243, Rev. 0	Correct Applicability for LTOP specifications	Approved by NRC	Incorporated
TSTF-244, Rev. 0	Correct invalid SR for Containment Isolation Valve Position	Under NRC Consideration	Incorporated
TSTF-245, Rev. 1	AFW train operable when in service	Approved by NRC	Not Incorporated. Not Applicable to North Anna¹²
TSTF-246, Rev. 0	RTS Instrumentation, 3.3.1 Condition F Completion Time	Approved by NRC	Incorporated
TSTF-247, Rev. 0	Provide separate condition entry for each PORV and block valve	Approved by NRC	Incorporated
TSTF-248, Rev. 0	Revise Shutdown Margin definition for stuck rod exception	Approved by NRC	Not Incorporated Due to Late Approval Date¹⁴
TSTF-249, Rev. 0	Physics Tests Exceptions reactivity effects correction	Approved by NRC	Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-250, Rev. 0	Delete specific FSAR section references	Under NRC Consideration	Not Incorporated
TSTF-251, Rev. 0	Eliminate TS 5.5.6, Pre-Stressed Concrete Containment Tendon Surveillance Program	Rejected by NRC	Not Incorporated
TSTF-252, Rev. 0	Provide generic SG tube surveillance reporting requirements	Withdrawn by TSTF	Not Incorporated
TSTF-253, Rev. 0	Omit Note which indicates that performance of one SR satisfies another	Approved by NRC	Incorporated
TSTF-254, Rev. 1	Extend Frequency of accumulated water checks for DG fuel oil.	Under NRC Consideration	Not Incorporated
TSTF-255, Rev. 1	Change title of "Spent Fuel Assembly Storage" to "Spent Fuel Pool Storage"	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁶
TSTF-256, Rev. 0	Modify MODE 2 STE Applicability	Approved by NRC	Incorporated
TSTF-257, Rev. 0	Revise leakage detection instrument Conditions to eliminate requirement to enter LCO 3.0.3	Rejected by NRC	Not Incorporated
TSTF-258, Rev. 4	Changes to Section 5.0, Administrative Controls	Approved by NRC	Incorporated
TSTF-260, Rev. 0	Eliminate monthly position verification for automatic valves	Under NRC Consideration	Not Incorporated
TSTF-262, Rev. 1	3.4.6, 3.4.7, and 3.4.8: Allow DHR/RHR/SDC pumps to be aligned for LPI	Under NRC Consideration	Not Incorporated
TSTF-263, Rev. 3	Correct usage of "required" components and base ACTIONS on inoperable required equipment	Approved by NRC	Incorporated
TSTF-265, Rev. 2	Clarify 3.4 "non-operating loop" SRs	Approved by NRC	Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-266, Rev. 3	Eliminate the Remote Shutdown System Table of Instrumentation and Controls	Approved by NRC	Incorporated
TSTF-267, Rev. 0	Add a Section 1.4 example of Frequency based on plant conditions	Under NRC Consideration	Not Incorporated
TSTF-268, Rev. 0	Revise the Frequency of SR 3.7.5.5, AFW/EFW flow path verification	Approved by NRC	Incorporated
TSTF-269, Rev. 2	Allow administrative means of position verification for locked or sealed valves	Approved by NRC	Incorporated
TSTF-270, Rev. 1	Add "Only Required to be Performed" Example to 1.4	Withdrawn by TSTF	Not Incorporated
TSTF-271, Rev. 1	LTOP Vent Path SR Frequency	Approved by NRC	Incorporated
TSTF-272, Rev. 1	Refueling Boron Concentration Clarification	Approved by NRC	Incorporated
TSTF-273, Rev. 2	SFDP Clarifications	Approved by NRC	Incorporated
TSTF-274, Rev. 0	Move the acceptance criteria for the battery charger performance test to the Bases	Rejected by NRC	Not Incorporated
TSTF-276, Rev. 2	Revise DG load rejection test	Approved by NRC	Incorporated
TSTF-277, Rev. 0	Revise accumulator boron concentration verification SR	Rejected by NRC	Not Incorporated
TSTF-278, Rev. 0	Battery Cell Parameters (LCO 3.8.6) includes more than Table 3.8.6-1 limits	Approved by NRC	Incorporated
TSTF-279, Rev. 0	Remove "applicable supports" from Inservice Testing Program	Approved by NRC	Incorporated
TSTF-280, Rev. 1	Exempt SRs on LTOP equipment not used to satisfy the LCO	Approved by NRC	Incorporated
TSTF-281, Rev. 0	MSIV AOT to 72 hours	Rejected by NRC	Not Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-282, Rev. 0	Extend the time allowed to perform the BOC precision RCS flow rate measurement	Rejected by NRC	Not Incorporated
TSTF-283, Rev. 3	Modify Section 3.8 Mode restriction Notes	Approved by NRC	Incorporated
TSTF-284, Rev. 3	Add "Met vs. Perform" to Specification 1.4, Frequency	Approved by NRC	Partially Incorporated⁴
TSTF-285, Rev. 1	Charging Pump Swap LTOP Allowance	Approved by NRC	Incorporated
TSTF-286, Rev. 2	Define "Operations Involving Positive Reactivity Additions"	Approved by NRC	Incorporated
TSTF-287, Rev. 5	Ventilation System Envelope Allowed Outage Time	Approved by NRC	Incorporated
TSTF-288, Rev. 1	PORV SR Notes Added	Withdrawn by TSTF	Not Incorporated
TSTF-289, Rev. 0	Separate closure time testing and actuation signal testing for MSIVs and Feedwater Isolation Valves	Approved by NRC	Incorporated
TSTF-290, Rev. 0	Revisions to hot channel factor specifications	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁹
TSTF-295, Rev. 0	Modify Note 2 to Actions of PAM Table to Allow Separate Condition Entry for Each Penetration	Approved by NRC	Incorporated
TSTF-299, Rev. 0	Administrative Controls Program 5.5.2.b Test Interval and Exception	Approved by NRC	Not Incorporated Due to Late Approval Date¹⁴
TSTF-300, Rev. 0	Eliminate DG LOCA-Start SRs while in S/D when no ECCS is Required	Approved by NRC	Incorporated ⁴
TSTF-302, Rev. 0	Delete specifics of Zirconium alloys from Design Features	Rejected by NRC	Not Incorporated

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OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-308, Rev. 1	Determination of Cumulative and Projected Dose Contributions in RECP	Approved by NRC	Incorporated
TSTF-309, Rev. 2	Revise Pressurizer PORV Actions to not require cycling of block valve when closed for isolation	Approved by NRC	Incorporated
TSTF-310, Rev. 0	Changes to Table 3.3.1-1	Under NRC Consideration	Incorporated
TSTF-311, Rev. 0	Revision of Surveillance Frequency for TADOT on Turbine Trip Functional Unit	Approved by NRC	Incorporated
TSTF-312, Rev. 1	Administratively Control Containment Penetrations	Approved by NRC	Incorporated
TSTF-313, Rev. 0	Eliminate Requirement for DG Start from "Standby Conditions"	Under NRC Consideration	Not Incorporated
TSTF-314, Rev. 0	Require Static and Transient Fq Measurement	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁹
TSTF-315, Rev. 0	Reduce plant trips due to spurious signals to the NIS during physics testing	Approved by NRC	Incorporated
TSTF-316, Rev. 1	Delete Bases discussion of interlock with respect to accumulator isolation valves	Approved by NRC	Incorporated
TSTF-322, Rev. 2	Secondary Containment and Shield Building Boundary Integrity SRs	Approved by NRC	Not Incorporated. Not Applicable to North Anna¹
TSTF-325, Rev. 0	ECCS Conditions and Required Actions with < 100% Equivalent ECCS Flow	Approved by NRC	Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-328, Rev. 0	Correct Main Steam Line Pressure Negative Rate - High Units and Time Constant	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁴
TSTF-329, Rev. 0	Revise 3.4.17 Bases to Match Specification	Approved by NRC	Incorporated
TSTF-330, Rev. 3	Allowed Outage Time - Ultimate heat sink	Approved by NRC	Not Incorporated Due to Late Approval Date¹⁴
TSTF-331, Rev. 0	3.1.5 Bases Change	Approved by NRC	Incorporated
TSTF-333, Rev. 1	Allowed performance time for testing Diesel Generators	Rejected by NRC	Not Incorporated
TSTF-335, Rev. 0	Clarify the Ice Basket 20 Basket Weight Criteria	Withdrawn by TSTF	Not Incorporated
TSTF-336, Rev. 1	Ice bed flow channel blockage surveillance requirement	Approved by NRC	Not Incorporated. Not Applicable to North Anna¹
TSTF-337, Rev. 0	Revise LCO 3.5.5 for RCP seal injection flow resistance	Under NRC Consideration	Not Incorporated
TSTF-338, Rev. 0	Modify SR 3.2.1.1 to reference the COLR	Approved by NRC	Not Incorporated. Not Applicable to North Anna⁹
TSTF-339, Rev. 2	Relocate TS Parameters to COLR	Approved by NRC	Incorporated
TSTF-340, Rev. 3	Allow 7 day Completion Time for a turbine-driven AFW pump inoperable	Approved by NRC	Incorporated
TSTF-341, Rev. 0	Revise Pressurizer Water Level Requirements	Under TSTF Consideration	Not Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-343, Rev. 0	Containment Structural Integrity	Under NRC Consideration	Not Incorporated
TSTF-344, Rev. 0	3.1.8 and 3.1.9 SR Frequency Change	Under NRC Consideration	Not Incorporated
TSTF-346, Rev. 0	Revise 3.8.1 Actions to Allow Time to Cooldown Under Natural Circulation	Under NRC Consideration	Not Incorporated
TSTF-347, Rev. 0	P-7 Surveillance	Under NRC Consideration	Incorporated
TSTF-348, Rev. 0	Cancellation of NRC Environmental Monitoring Program with States	Approved by NRC	Incorporated
TSTF-349, Rev. 1	Add Note to LCO 3.9.5 Allowing Shutdown Cooling Loops Removal from Operation	Approved by NRC	Incorporated
TSTF-352, Rev. 1	Provide Consistent Completion Time to Reach MODE 4	Approved by NRC	Incorporated
TSTF-355, Rev. 0	Make changes to RTS and ESF Tables	Approved by NRC	Incorporated
TSTF-356, Rev. 1	Revise Ice Condenser Ice Sampling and Analysis Requirements	Approved by NRC	Not Incorporated. Not Applicable to North Anna¹
TSTF-358, Rev. 5	Increase Allowance for Missed Surveillance Requirements	Under NRC Consideration	Not Incorporated
TSTF-359, Rev. 4	Increase Flexibility in MODE Restraints	Under TSTF Consideration	Not Incorporated
TSTF-360, Rev. 1	DC Electrical Rewrite	Under NRC Consideration	Partially Incorporated¹³
TSTF-361, Rev. 2	Allow standby SDC/RHR/DHR loop to be inoperable to support testing	Approved by NRC	Incorporated
TSTF-362, Rev. 0	Change to the VFTP in ITS Section 5.0 in accordance with GL 99-02	Approved by NRC	Incorporated

Disposition of Generic Changes to NUREG-1431

OG / TSTF Number	Short Title	Approval Status	Disposition in North Anna ITS
TSTF-363, Rev. 0	Revise Topical Report references in ITS 5.6.5, COLR	Approved by NRC	Incorporated
TSTF-364, Rev. 0	Revision to TS Bases Control Program to Incorporate Changes to 10 CFR 50.59	Approved by NRC	Incorporated
TSTF-365, Rev. 0	Add upper limits to the voltage and time delay setpoints of the loss of voltage relays	Approved by NRC	Incorporated
TSTF-366, Rev. 0	Elimination of Requirements for a Post Accident Sampling System (PASS)	Approved by NRC	Not Incorporated Due to Late Approval Date¹⁴
TSTF-367, Rev. 0	Insert Reference to Criterion 4	Approved by NRC	Not Incorporated Due to Late Approval Date¹⁴
TSTF-369, Rev. 0	Deletion of TS 5.6.4, Monthly Operating Report	Under NRC Consideration	Not Incorporated
TSTF-370, Rev. 0	Increase accumulator Completion Time from 1 hour to 24 hours	Under NRC Consideration	Not Incorporated

Notes:

1. The TSTF is only applicable to dual and/or ice condenser containment technical specifications. North Anna utilizes a subatmospheric containment.
2. The TSTF only affects NUREG-1431, not the plant-specific ITS.
3. The TSTF is only applicable to plants utilizing Constant Axial Offset Control. North Anna utilizes Relaxed Power Distribution Control.
4. The associated Justification for Deviation explains the disposition of this TSTF.
5. TSTF-65 was incorporated in Chapter 5.0, but not Chapter 2.0. TSTF-5 deleted the material affected by TSTF-65 in Chapter 2.0.
6. North Anna did not adopt the specification in NUREG-1431 modified by this TSTF.

Disposition of Generic Changes to NUREG-1431

7. The TSTF is only applicable to plants with an RHR system that also serves as the low pressure ECCS injection system. North Anna has separate RHR and low pressure injection ECCS systems.
8. The TSTF is only applicable to plants utilizing the Westinghouse RAOC methodology. North Anna does not utilize this methodology.
9. The TSTF is only applicable to plants utilizing the Westinghouse hot channel factor methodology. North Anna does **not** utilize this methodology.
10. The TSTF is only applicable to plants with shield buildings around the containment. North Anna does not have a shield building.
11. The TSTF is only applicable to plants adopting a Pressure Temperature Limit Report (PTLR). North Anna is not adopting a PTLR.
12. The TSTF is only applicable to plants that utilize the AFW system during normal plant startups. North Anna does not utilize AFW during normal startups.
13. Only those portions of TSTF-360 that change SR 3.8.4.8 were incorporated.
14. The TSTF was approved at a point in the North Anna ITS development process that did not allow it to be incorporated in the initial ITS submittal. The TSTF will be considered for incorporation into a supplement to this license amendment request.
15. The change to the Definitions has been incorporated into the ITS submittal. The changes to the Bases have not been incorporated because the associated analyses have not yet been performed.
16. North Anna did not adopt ISTS SR 3.1.8.1, which is modified by this TSTF. Therefore, this TSTF is not adopted.
17. North Anna did not adopt the bracketed LCO Notes of ISTS 3.5.2, which is modified by this TSTF. Therefore, this portion of this TSTF is not adopted.
18. North Anna did not adopt ISTS SR 3.3.4.4, which is modified by this TSTF. Therefore, this portion of this TSTF is not adopted.

Differences from NUREG and Current Technical Specifications

No.	ITS	CTS	SUMMARY OF CHANGE	DOC	JFD
1	3.1.8		NUREG does not have a Primary Grade Water Flow Path Isolation Valves specification. CTS for Unit 1 has technical requirements modified. ITS requirements have been proposed to be consistent with the format of NUREG.	M.1 L.1	1
2	3.2.1 Req. Act. A.1	SR 4.2.2.2.f.2.a	NUREG in Condition B requires the reduction of AFD limits within 4 hours (TSTF 241). CTS does not specify a time for the AFD limits to be reduced. ITS changes the time to 15 minutes to reduce the AFD within limit.	M.2	1
3	SR 3.3.1.2	Table 4.3-1 Function 2A D ⁽²⁾	NUREG requires the daily comparison of NIS readings with calorimetric calculations with adjustments required if "absolute difference > 2%." CTS for Unit 2 requires the daily comparison of NIS readings with calorimetric calculations with adjustments required if "absolute difference > 2%." ITS requires the adjustment of NIS when calorimetric calculations exceed the NIS by > 2%."	L.7 (Unit 2)	4
4	SR 3.3.1.6	New	NUREG states, "Calibrate excore channels to agree with incore detector measurements." CTS does not have this requirement. ITS states, "Compare results of the excore channels to incore detector measurements." Note is added to require NIS channel adjustment if absolute difference is > 3%.	L.16	15
5	3.3.1 Function 6 OT ΔT Allowable Value Note 1	Table 2.2-1 Function 7 OT ΔT Allowable Value Note 3	NUREG brackets the % that the trip setpoint may differ from the Allowable Value for the OTΔT function. CTS states the % allowed for the trip setpoint differing from the Allowable Value is 2.0% for the OTΔT function. ITS states the % allowed for the trip setpoint may differ from the Allowable Value by 2.3 %.	L.21	7
6	3.3.2 ESFAS Interlock P-12	Table 3.3-3 ESF Interlock P-12	NUREG brackets the Allowable Value for the P-12 interlock. CTS states the Allowable Value for the P-12 interlock as 541° F. ITS states the Allowable Value for the P-12 interlock as 542 ° F.	M.7	1
7	3.3.2 ESFAS Functions 1.c, 1.d, 1.f, 2.c, 4.c, and 4.d.	Table 3.3-4 ESF Functions 1.c, 1.d, 1.f, 2.c, 4.c, and 4.d.	<p>NUREG brackets the Allowable Values for the following functions:</p> <p>CTS for 1.c is 18.5 psia. ITS for 1.c is 17.7 psia. CTS for 1.d is 1755 psig. ITS for 1.d is 1770 psig. CTS for 1.f are 44% and 111.5%. ITS for 1.f are 43% and 111%. CTS for 2.c is 29.25 psia ITS for 2.c is 28.45 psia. CTS for 4.c is 19.3 psia ITS for 4.c is 18.5 psia. CTS for 4.d are 44% and 111.5% ITS for 4.d are 43% and 111%</p>	M.7	1

Differences from NUREG and Current Technical Specifications

No.	ITS	CTS	SUMMARY OF CHANGE	DOC	JFD
8	3.4.12 Cond. C	New	NUREG Condition C states that when an accumulator is not isolated and its pressure is greater than the maximum RCS pressure for existing cold leg temperature allowed by PTLR, the accumulator must be isolated within 1 hour. CTS does not specify a similar requirement. ITS states for Condition C that when an accumulator is not isolated or power is available to one or more accumulator isolation valve operators, the accumulator must be isolated immediately and power removed from affected accumulator isolation valve operator in one hour. A Note modifies the Condition to state that it is only applicable when accumulator pressure is greater than PORV lift setpoint.	M.4	6
9	SRs 3.4.17.1 3.4.17.2	New 4.4.1.2	NUREG requires verification that each RCS loop isolation valve is open and power is removed from the valve operator every 31 days. CTS requires verification every 31 days that, for the RCS loops in operation, the power is removed from the loop stop valve operators. ITS requires a verification that each RCS loop isolation valve is open once prior to removing power from the valve operator and that power is removed from each operator every 31 days.	M.3	1
10	3.4.18 Cond. F	3.4.1.4, 3.4.1.5, and 3.4.1.6	In NUREG 3.4.18, the LCO, Conditions, or Required Actions, do not reflect CTS requirements for RCS isolated loop startup. The NUREG assumes the RCS loop is filled and only the boron concentration and temperature must be controlled in order that the isolated loop may be placed in service. NUREG SRs, with little modifications, do reflect the CTS SRs for a filled RCS loop. For a drained RCS loop, the NUREG does not have associated SRs. CTS requirements provide for a RCS loop in two possible conditions, filled or drained. ITS requirements accurately reflect the minimum requirement for an RCS loop.	M.3, L.1, M.4, M.5	1, 3
11	SR 3.5.2.3	NA	NUREG for SR 3.5.2.3 states, "Verify ECCS piping is full of water," at a frequency of every 31 days. This requirement is bracketed in the NUREG. CTS does not have a similar requirement. ITS states, "Verify ECCS piping is sufficiently full of water," and changes the Frequency to 92 days.	M.3	5, 6
13	ISTS SR 3.6.4.3	4.6.3.1.1.a	NUREG includes a requirement to cycle each weight or spring loaded check valve testable during operation every 92 days. CTS includes a requirement to cycle each weight or spring loaded check valve testable during operation every 92 days. ITS does not include such a requirement because there are no such valves testable during operation.	A.10	5
14	3.7.3	New	NUREG states that with one or more of the MFIVs, MFRVs, or other bracketed valves inoperable, those valves be verified closed. This is a new requirement for the CTS. ITS allows the verification to be performed by administrative means.	M.1	3

Differences from NUREG and Current Technical Specifications

No.	ITS	CTS	SUMMARY OF CHANGE	DOC	JFD
15	ISTS 3.7.7	3.7.3.1 3.7.3.2	NUREG includes an LCO for the Component Cooling System. CTS includes an LCO for the Component Cooling System. ITS does not include an LCO for the Component Cooling System.	R.1	1
16	3.7.9	3.7.6.1	NUREG includes requirements for the Ultimate Heat Sink. CTS includes requirements for the Service Water Reservoir and the North Anna Reservoir. ITS does not include requirements for the North Anna Reservoir.	R.1	NA
17	3.7.10	3.7.7.1	NUREG requires two trains of CREFS ventilation to be OPERABLE. CTS requires the emergency ventilation system to be OPERABLE. ITS requires two trains of the MCR/ESGR EVS to be OPERABLE, and one other unit train of the MCR/ESGR EVS to be OPERABLE.	M.1	5
18	SR 3.7.11.1	New	NUREG SR 3.7.11.1 requires verifying that each CREATCS train has the capability to remove the assumed heat load every 18 months. CTS 4.7.7.3 requires each control room air conditioning system be demonstrated OPERABLE by verifying the control room air temperature is $\leq 120^{\circ}\text{F}$. ITS SR 3.7.7.1 requires each MCR/ESGR ACS chiller be verified to be capable of removing the assumed heat load every 18 months on a STAGGERED TEST BASIS.	M.2	4
19	3.7.12 LCO Note	3.7.8.1, new note	NUREG NOTE states the ECCS pump room boundary openings may be opened intermittently under administrative control. CTS does not have such an allowance. ITS adds the phrase "not open by design" to state the ECCS pump room boundary openings not open by design may be opened intermittently under administrative control.	M.2	4
20	SR 3.7.12.2 SR 3.7.12.4	4.7.8.1.a.1	NUREG addresses ECCS PREACS, to include all applicable ECCS components outside containment, as a two train automatic system. CTS 4.7.8.1.a.1 initiates flow from the control room through the Auxiliary Building HEPA filter and charcoal adsorber assembly for the Safeguards Area Ventilation System. ITS SR 3.7.12.2 actuates each ECCS PREACS train by aligning Safeguards Area exhaust flow and Auxiliary Building Central exhaust flow through the Auxiliary Building HEPA filter and charcoal adsorber assembly. ITS 3.7.12.4 verifies Safeguards Area exhaust flow is diverted and each Auxiliary Building filter bank is actuated on an actual or simulated actuation signal, but not that the entire train is actuated.	M.1	7
21	SR 3.7.12.5	New	NUREG includes a bracketed value at which an ECCS PREACS train can maintain the pressure in the associated spaces. CTS does not include this surveillance. ITS does not specify a specific pressure, but requires a train to maintain a negative pressure. The Bases state this can be done in a qualitative manner.	M.2	3
22	SR 3.7.12.5	New	NUREG states that the pressure that can be maintained in the associated ECCS PREACS spaces is relative to atmospheric pressure. CTS does not include this surveillance. ITS	M.2	8

Differences from NUREG and Current Technical Specifications

No.	ITS	CTS	SUMMARY OF CHANGE	DOC	JFD
			SR 3.7.12.5 states the pressure maintained is relative to adjacent areas.		
23	SR 3.7.12.5	New	NUREG includes a bracketed value for the ECCS PREACS flow rate used to verify that the required pressure in the ECCS PREACS spaces can be maintained. CTS does not include this surveillance. ITS does not include a specific ECCS PREACS flow rate.	M.2	9
24	3.7.13	3.7.7.1 action b	NUREG does not have a specific LCO for control room bottled air, but for CREFS. With both required trains inoperable, the NUREG requires entering LCO 3.0.3. CTS allows the bottled air system to be inoperable for 7 days. ITS allows two or more required trains of the MCR/ESGR bottled air system to be inoperable for 24 hours.	M.2	7
25	3.7.13	3.7.7.1	NUREG does not have a specific LCO for control room bottled air, but for CREFS, it requires two trains to be OPERABLE. CTS requires the bottled air pressurization system to be OPERABLE. ITS requires three trains of the MCR/ESGR bottled air system be OPERABLE.	M.1	4
26	SR 3.7.13.2, NEW	4.7.7.2.a	NUREG does not have a specific LCO for control room bottled air. CTS 4.7.7.2 requires verifying that the system contains the minimum number of bottles. ITS SR 3.7.13.2 requires verifying that each required MCR/ESGR bottled air bank manual valve not locked, sealed, or otherwise secured and required to be open during accident conditions is open.	M.6	6
27	3.7.15	3.9.12	NUREG includes requirements for Fuel Building Ventilation System filtration. CTS includes requirements for Fuel Building Ventilation System filtration. ITS does not include requirements for Fuel Building Ventilation System filtration.	L.2	5
28	LCO 3.8.1	LCO 3.8.1.1	NUREG does not address the concept of shared components electrically powered from both units. The CTS in the SW specification under plant systems requires both normal and emergency power sources to be OPERABLE for a SW pump to be considered OPERABLE. ITS specifies all of the electrical source AC requirements for a unit that are required to support any required shared components.	A.9	12
29	SR 3.8.1.8	4.8.1.1.1.b Unit 2	NUREG states that a verification is required to be performed on an offsite circuit by transferring it from its normal to the alternate supply every 18 months. CTS for Unit 2 states requirement for testing of the offsite circuit by transferring it from the normal to the alternate offsite circuit every 18 months. ITS for Unit 2 does not require this test.	L.7	5
30	LCO 3.8.4	LCO 3.8.2.3	NUREG does not address the concept of shared components electrically powered from both units. The CTS in the SW specification under plant systems requires both normal and emergency power sources to be OPERABLE for a SW pump to be considered OPERABLE. ITS specifies all of the electrical DC source requirements for a unit that are required to support any required shared components.	A.5	1

Differences from NUREG and Current Technical Specifications

No.	ITS	CTS	SUMMARY OF CHANGE	DOC	JFD
31	SR 3.8.4.6	4.8.2.3.2.c.3	NUREG brackets the value for the battery charger current. CTS requires that the battery charger must charge at 200 amps or more. ITS states the battery charger current is 270 amps or greater.	M.1	5
32	LCO 3.8.6	LCO 3.8.2.3	NUREG does not address the concept of shared components electrically powered from both units. The CTS in the SW specification under plant systems requires both normal and emergency power sources to be OPERABLE for a SW pump to be considered OPERABLE. ITS specifies all of the battery requirements for a unit that are required to support any required shared components.	A.4	1
33	Table 3.8.6-1 Notes b&c	Table 4.8-3 Note b	NUREG brackets the charging current for station batteries on float voltage. CTS specifies a charging current of 12 amps with the battery on float voltage. ITS states the charging current as 2 amps with the battery on float voltage.	M.3	3
34	LCO 3.8.9	LCO 3.8.2.3	NUREG does not address the concept of shared components electrically powered from both units. The CTS in the SW specification under plant systems requires both normal and emergency power sources to be OPERABLE for a SW pump to be considered OPERABLE. ITS specifies all of the electrical distribution requirements for a unit that are required to support any required shared components.	A.4	3
35	3.9.4	3.9.4, 3.9.9	NUREG specifies that each penetration of the containment shall be capable of isolation during the movement of fuel while performing CORE ALTERATIONS. LCO part c.2 states that the Containment Purge and Exhaust Isolation System is required to be OPERABLE. CTS LCO states automatic Purge and Exhaust valve closure shall be OPERABLE. ITS LCO requires the purge and exhaust isolation valve to be OPERABLE and capable of isolating the containment.	LA.1	2
36	3.9.4	3.9.4 * and **	NUREG does not discuss the removable personnel air lock (PAL) closure requirements. CTS provides requirements for the permanently installed PAL. ITS excludes requirements for the removable PAL and deletes the requirement to be able to close the PAL.	LA.1, A.5	2
37	Note to SR 3.9.6.2	New	NUREG does not have a modifying Note for the SR. CTS does not contain a similar SR. ITS adds a Note to new SR.	M.1	2

Differences from NUREG and Current Technical Specifications

No.	ITS	CTS	SUMMARY OF CHANGE	DOC	JFD
38	5.5.10	4.7.8.1.b.1	NUREG requires bracketed flow rates for testing the ECCS PREACS filters, and a bracketed maximum pressure drop across the ECCS PREACS filters. CTS specifies an Safeguards Area Ventilation System (SAVS) flow rate for testing filters as $6300 \pm 10\%$, and the pressure drop across the filters as ≤ 6 inches. ITS requires the test be performed at a nominal flow rate. A paragraph is added discussing why this was acceptable. The flow rate at which the maximum pressure drop across ECCS PREACS filters is tested is $\leq 39,200$ cfm, and the pressure drop is ≤ 5 inches.	M.22	15
39	5.5.10	4.7.8.1.b.2	ITS requires a bracketed humidity level at which ventilation filters are tested. CTS 4.4.8.1.b.2 requires the humidity at which SAVS filters are tested be 95%. ITS 5.5.10 requires the humidity at which the ECCS PREACS filters be tested be 70%.	L.33	1
40	5.5.10	4.7.7.1.d.1	NUREG requires a bracketed maximum pressure drop across the MCR/ESGR HEPA and charcoal adsorber filters. CTS 4.7.7.1.d.1 includes a specified maximum pressure drop across the main control room HEPA and charcoal adsorber filters of 6 inches. ITS 5.5.10 includes a maximum pressure drop across MCR/ESGR demister, HEPA and charcoal adsorber filters of 5 inches.	M.23	1
41	5.5.13	New	NUREG includes a Diesel Fuel Oil (DFO) Testing Program. CTS do not include such a program. ITS includes several modifications to the DFO testing program to match plant testing processes.	M.6	9, 10, 11
42	5.5.15.d	4.6.1.1, 3.6.1.2, 3.6.1.3	NUREG includes a Containment Leakage Rate Testing Program. CTS include requirements associated with maintaining containment leakage rate within limits, but not an explicit program. ITS modifies the leakage rate acceptance criteria in the NUREG to exactly match the CTS.	A.10	17
43	Table 5.5.8-2	Table 4.4-2	NUREG requires including existing steam generator tube inspection requirements into brackets. Unit 1 CTS steam generator tube inspection requirements include a statement that when an additional SG is determined in a C-3 status, NRC approval is required prior to operation. ITS does not include this requirement.	L.22	1
44	5.5.10	4.7.7.1 4.7.8.1	NUREG requires that the ESF filter ventilation systems tested as part of the Ventilation Filter Testing Program (VFTP) be tested at frequencies specified in a bracketed NUREG. CTS includes specific frequencies that are being relocated to the VFTP. ITS states that the ESF filter ventilation systems tested as part of the Ventilation Filter Testing Program (VFTP) be tested at frequencies in general conformance with Regulatory Guide 1.52 and ANSI N510-1975.	LA.5	7