

June 1, 2001

Mr. David A. Christian
Senior Vice President and
Chief Nuclear Officer
Innsbrook Technical Center-2SW
5000 Dominion Blvd.
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SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2: REQUEST FOR
ADDITIONAL INFORMATION (RAI) REGARDING THE QUALITY ASSURANCE
PROGRAM FOR THE IMPROVED TECHNICAL SPECIFICATIONS (ITS) FOR
NORTH ANNA POWER STATION, UNITS 1 AND 2 (TAC NOS. MB0799
AND MB0800)

Dear Mr. Christian:

The NRC staff reviewed your application dated December 11, 2000, to change the format and content of the Current Technical Specifications (CTS) to be consistent with NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1, and certain generic changes to the NUREG.

We have reviewed those changes that would relocate certain requirements to the licensee's Quality Assurance Topical Report, consistent with the Commission's Final Policy Statement on Technical Specifications Improvements for Nuclear Reactors (58 FR 39132). Based on our review of the submittal, we find that additional information identified in the enclosure is needed. This inquiry was discussed with Ms. Regina Borsh of your licensing staff on May 30, 2001, who agreed to provide the staff with a response within 90 days of the date of this letter.

Sincerely,

/RA/

Stephen R. Monarque, Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-338 and 50-339

Enclosure: Request for Additional Information

cc w/encl: See next page

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North Anna Power Station
Units 1 and 2

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REQUEST FOR ADDITIONAL INFORMATION
NORTH ANNA POWER STATION, UNITS 1 AND 2
IMPROVED TECHNICAL SPECIFICATIONS (ITS)
QUALITY ASSURANCE PROGRAM

1. A revised (or marked up) Quality Assurance (QA) Topical Report, incorporating the proposed relocations of administrative Current Technical Specifications (CTS), should be submitted for review in conjunction with the proposed technical specification changes.
2. Relocation of administrative Technical Specifications (TS) to quality assurance programs is addressed by Administrative Letter 95-06, which is available on the NRC web. As discussed in the administrative letter, certain TS administrative requirements may be relocated intact (i.e., without change) to the QA topical.

For TS requirements that are not relocated intact, additional justification should be provided, particularly with respect to deviations from the applicable regulatory guides and standards listed in Table 17.2-0 of the QA Topical. The licensee should identify those changes that would be relocated intact and provide additional justification for those that are not.

3. With regard to the review and audit functions (CTS 6.5), the applicable basis statement (LA. 6) states that the requirements would be relocated to the QA Topical Report where subsequent changes would be controlled under 10 CFR 50.59. Please confirm that subsequent changes to these QA commitments would be controlled under 10 CFR 50.54(a)(3) or 50.54(a)(4).
4. With regard to the NUREG-0737 independent safety engineering (ISE) function (TS 6.2.3), the licensee proposes to relocate these requirements to the Updated Final Safety Analysis Report, where these changes would be controlled under 10 CFR 50.59. The ISE function is considered to be part of a licensee's plan for conducting reviews of operating phase activities, as described in NUREG-0800, Standard Review Plan 13.4. Accordingly, the ISE function should be relocated to the QA Topical, where subsequent changes would be controlled under 10 CFR 50.54(a)(3) or 50.54(a)(4).