

July 2, 2001

Mr. David A. Christian
Senior Vice President and
Chief Nuclear Officer
Innsbrook Technical Center-2SW
5000 Dominion Blvd.
Glen Allen, Virginia 23060-6711

SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2: REQUEST FOR
ADDITIONAL INFORMATION (RAI) REGARDING SECTION 5.0 OF 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.

On the basis of our review of the proposed changes for ITS Section 5.0, Administrative Controls, we find that additional information identified in the enclosure is needed. This inquiry was discussed with Ms. Regina Borsh of your licensing staff on June 25, 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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DOCUMENT NAME: C:\Program Files\Adobe\Acrobat 4.0\PDF Output\MB0799-800rev6.wpd
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Mr. David A. Christian
Virginia Electric and Power Company

North Anna Power Station
Units 1 and 2

cc:

Mr. C. Lee Lintecum
County Administrator
Louisa County
P.O. Box 160
Louisa, Virginia 23093

Mr. David A. Heacock
Site Vice President
North Anna Power Station
P.O. Box 402
Mineral, Virginia 23117-0402

Mr. Donald P. Irwin, Esquire
Hunton and Williams
Riverfront Plaza, East Tower
951 E. Byrd Street
Richmond, Virginia 23219

Mr. Richard H. Blount, II
Site Vice President
Surry Power Station
Virginia Electric and Power Company
5570 Hog Island Road
Surry, Virginia 23883-0315

Dr. W. T. Lough
Virginia State Corporation
Commission
Division of Energy Regulation
P.O. Box 1197
Richmond, Virginia 23209

Robert B. Strobe, M.D., M.P.H.
State Health Commissioner
Office of the Commissioner
Virginia Department of Health
P. O. Box 2448
Richmond, Virginia 23218

Old Dominion Electric Cooperative
4201 Dominion Blvd.
Glen Allen, Virginia 23060

Mr. William R. Matthews
Vice President - Nuclear Operations
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, Virginia 23060-6711

Mr. Stephen P. Sarver, Director
Nuclear Licensing & Operations Support
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, Virginia 23060-6711

Office of the Attorney General
Commonwealth of Virginia
900 East Main Street
Richmond, Virginia 23219

Senior Resident Inspector
North Anna Power Station
U.S. Nuclear Regulatory Commission
1024 Haley Drive
Mineral, Virginia 23117

REQUEST FOR ADDITIONAL INFORMATION (RAI)
NORTH ANNA POWER STATION, UNITS 1 AND 2 (NAPS)
IMPROVED TECHNICAL SPECIFICATIONS (ITS)
ITS SECTION 5.0, ADMINISTRATIVE CONTROLS

5.01 ITS 5.3.1, Current Technical Specification (CTS) 6.3.1, Justification for Deviation (JFD) 1
The Note in Standard Technical Specification (STS) 5.3.1 requires that minimum staff qualifications meet Regulatory Guide (RG) 1.8, Rev 2, 1987 or more recent revisions. The proposed ITS 5.31 refers to RG 1.8, September 1975, and VEPCO has already defined Shift Superintendent, Assistant Shift Superintendent, etc., as members of the unit staff. Retain STS wording or provide detailed justifications for the proposed change.

5.02 ITS 5.4.1, CTS 6.8.1.g, L32

Discussion of Changes (DOC) L32 states that the change to the Process Control Program is acceptable due to the fact that "Compliance with the specified requirements governing the disposal of radioactive waste is still required." Provide justification how the CTS requirements are being complied with in the proposed ITS. Revise the DOC to reflect this compliance.

5.03 ITS 5.5.6, CTS 4.4.10.1.1, Insert 2

A reference to Technical Specifications Task Force (TSTF)-237 was provided as the reason for changes to STS 5.5.7 [proposed ITS 5.5.6]. The changes proposed in TSTF-237 provide exception to the recommendations of RG 1.14, Rev 1, Regulatory Position C.4.b, and allow for an acceptable inspection method. Provide JFD for the proposed INSERT 2 or retain STS wording and adopt the "INSERT" that came with TSTF-237, Rev 1.

5.04 ITS 5.5.8, CTS 4.4.5.2, JFD 7, new INSERT to ITS page 5.0.11

Explain why JFD 7 is applicable to the proposed ITS 5.5.8. Explain the content of the new INSERT, such as where items in the INSERT originated, and revise JFD 7 accordingly.

5.05 ITS 5.5.9, CTS 6.8.4.c, JFD 4

JFD 7 states that "Reference to low pressure turbine disc stress corrosion cracking associated with the secondary water chemistry program is deleted because it is not applicable to NAPS." Does this mean that NAPS has no such turbine disk in the system? The JFD further states that there has been no evidence of low pressure turbine disc stress corrosion cracking at NAPS. State the basis for this determination. Adopt STS wording or revise JFD to provide detailed justification.

5.06 ITS 5.5.10.d, CTS 4.7.7.1.d, JFD 16, new INSERT to page 5.0-13

Format is not consistent with other ITS formats that have been adopted in the same ITS section. Rearrange parameters and adopt STS Table format.

5.07 ITS 5.5.11, ITS 5.5.11.a, ITS 5.5.11.b, CTS 3.11.2.5, marked-up bubbles

STS wording "Waste Gas Holdup System" is changed to "Waste Gas Decay Tanks." Provide justification for this change from STS wording. Explain reason for deletion of wording "and fed into the offgas treatment system" from STS 5.5.12.b and provide related JFD for these proposed changes.

5.08 ITS 5.5.15.a, and b, CTS 4.6.1.2, CTS 4.6.1.3.a, no JFD

Provide JFD to justify the deviation in wording from TSTF-52, Rev 1, and the proposed wording "The Peak calculated..." used in ITS 5.5.15.b. Provide JFD or adopt wording in TSTF-52.

5.09 ITS 5.5.15.d.2, CTS 3.6.1.3.b, JFD 14

JFD 14 states that criterion ISTS 5.5.15.d.2.b is not adopted because "... ISTS 5.5.15.d.2.a provides an acceptable leakage rate criterion for the air lock doors..." Revise proposed ITS 5.5.15.d 1 to incorporate wording "for all airlock doors" at the end of the words "...acceptance criteria..are" in ITS 5.5.15.d.1 for clarification purpose.

5.10 ITS 5.6.5, CTS 6.9.1.7.a, A37, INSERT 1

Items 6 of CTS 6.9.1.7.a requires the Core Operating Report to have operating limit for Power Factor Multiplier; however, this requirement has not been incorporated into ITS 5.6.5. Revise ITS 5.6.5 to include this reporting requirement.

5.11 ITS 5.7.1.c, CTS 6.12, DOC L11 and DOC L 17, Footnote * on page 67 of 69 marked-up pages. Wording in proposed ITS 5.7.1.c, i.e., "Individual qualified in radiation protection procedures and..." does not appear to match with marked-up wording on page 67 "radiation protection personnel or..." Revise either ITS or CTS markup.

5.12 ITS 5.7.1.d.3 and 5.7.2.d.3, CTS 6.12.1, CTS 6.12.2, DOC L127

Correct the DOC and correct the reference in the proposed ITS, as there is no ITS 5.7.1.4.d.3 nor ITS 5.7.2.4.d.2.

5.13 ITS 5.7.2.c, CTS 6.12, DOC L11 and DOC L 17, Footnote * on page 67 of 69 marked-up pages. Wording in the proposed ITS 5.7.2.c "Individual qualified in radiation protection procedures and..." does not appear to match with marked-up wording on page 67 "radiation protection personnel or..." Revise either ITS or CTS markup.

5.14 ITS 5.5.8.3, CTS4.4.5.3.c.1, A20

Marked-up reference on CTS was labeled as "ITS 3.4.13," while the proposed ITS indicates a reference label as "ITS 3.4.14." Revise ITS and correct referencing as shown in the marked-up page [page 34 of 69 on page 3/4 4-11].

5.15 ITS Table 5.5.8.2, CTS Table 4.4-2 [page 38 of 69, old 3/4 4-15], L-22

ITS Table does not show reporting requirement as indicated in the marked-up note on the CTS Table under column "Action Not Required." Revise ITS Table to reflect this marked-up wording.