

September 18, 2001

Mr. David A. Christian  
Senior Vice President and  
Chief Nuclear Officer  
Virginia Electric and Power Company  
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 REGARDING SECTION 3.3.1, SURVEILLANCE  
REQUIREMENT 3.3.1.6, IMPROVED TECHNICAL SPECIFICATIONS;  
LICENSEE-IDENTIFIED BEYOND-SCOPE ISSUE (TAC NOS. MB1433 AND  
MB1427)

Dear Mr. Christian:

The NRC staff reviewed your application dated December 11, 2000, to change the format and content of the Current Technical Specifications 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 this licensee-identified beyond-scope issue, Surveillance Requirement 3.3.1.6 of Section 3.3.1, "Reactor Trip System (RTS) Instrumentation," Virginia Electric and Power Company (VEPCO) is requested to provide additional information identified in the enclosure. VEPCO is requested to provide a response to the staff within 60 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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Virginia Electric and Power Company

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Units 1 and 2

cc:

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**REQUEST FOR ADDITIONAL INFORMATION**  
**NORTH ANNA POWER STATION, UNITS 1 AND 2**  
**IMPROVED TECHNICAL SPECIFICATIONS (ITS)**  
**LICENSEE-IDENTIFIED BEYOND-SCOPE ISSUE**  
**ITS SECTION 3.3.1, SURVEILLANCE REQUIREMENT (SR) 3.3.1.6**

Standard Technical Specifications (STS) SR 3.3.1.6 calls for calibrating the excore Nuclear Instrumentation System (NIS) channels to agree with incore detector measurements every 92 Effective Full-Power Days (approximately quarterly) when thermal power is  $\geq 50\%$  Rated Thermal Power (RTP). This SR is performed to verify the  $f(\Delta I)$  input to the overtemperature  $\Delta T$  trip.

The proposed North Anna ITS SR 3.3.1.6 calls for comparing the results of the excore channels to incore detector measurements and adjusting the NIS channel if the absolute difference is  $\geq 3\%$ . The surveillance frequency and thermal power condition are the same as in the STS.

Virginia Electric and Power Company (VEPCO) has not provided any Technical Justification for applying the 3% absolute difference value. VEPCO has indicated that the 3% value was chosen to be consistent with SR 3.3.1.3, which includes the same note. However, SR 3.3.1.3 is for thermal power  $\geq 15\%$  RTP and has a monthly testing requirement. The function of SR 3.3.1.3 is similar to SR 3.3.1.6 in that it is also performed to verify the  $f(\Delta I)$  input to the overtemperature  $\Delta T$  trip.

VEPCO is requested to address the following staff questions.

1. Provide technical justification for choosing a 3% absolute difference at power levels  $\geq 50\%$  RTP. This discussion should include the impact that a 3% absolute difference between excore NIS channels and incore detector measurements may have on the Overtemperature  $\Delta T$  trip setpoint. Also discuss which transients/accidents credit the Overtemperature  $\Delta T$  trip and how the sequence of events and results (Minimum Departure from Nucleate Boiling Ratio, Reactor Coolant System Pressure, Fuel Temperature, etc.) are impacted.
2. By not adopting the STS for SR 3.3.1.6, it appears that the proposed ITS Surveillance Requirements SR 3.3.1.6 and SR 3.3.1.3 are identical at thermal power  $\geq 50\%$  RTP. Both Surveillance Requirements now include the 3% absolute difference note and they both have the function of verifying the  $f(\Delta I)$  input to the overtemperature  $\Delta T$  trip. Discuss how the proposed ITS SR 3.3.1.6 is different from SR 3.3.1.3 at thermal power levels  $\geq 50\%$ , and why the wording of STS SR 3.3.1.6 is not being adopted.