

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 10, 2001

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

Serial No. 01-434
NL&OS/GDM R1
Docket Nos. 50-280, 281
50-338, 339
License Nos. DPR-32, 37
NPF-4, 7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATIONS CHANGES
ELIMINATION OF POST-ACCIDENT SAMPLING SYSTEM REQUIREMENTS

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company (Dominion) requests amendments in the form of revisions to Facility Operating License Numbers DPR-32 and DPR-37 for Surry Power Station Units 1 and 2, and NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively, and to their accompanying Technical Specifications (TS). The proposed revisions would delete a license condition associated with the implementation of the Post-Accident Sampling System (PASS) (North Anna Unit 2 only) and would also eliminate the TS requirements to have and maintain a post-accident sampling system at Surry and North Anna Power Stations. These changes are consistent with the NRC approved Industry/Technical Specification Task Force Traveler, TSTF-366, "Elimination of Requirements for Post Accident Sampling System (PASS)." The availability of this Technical Specification improvement was announced in the Federal Register, Vol. 65, No. 211, on October 31, 2000, as part of the NRC's Consolidated Line Item Improvement Process (CLIP).

A description and assessment of the proposed changes to the Surry Units 1 and 2 and North Anna Units 1 and 2 Technical Specifications (and the North Anna Unit 2 Operating License) is provided in Attachments 1 and 2, respectively. Marked-up Operating License and Technical Specifications pages that reflect the proposed changes are provided in Attachment 3 for Surry and in Attachments 5 and 6 for North Anna Units 1 and 2, respectively. Revised Operating License (for North Anna Unit 2) and Technical Specifications pages that incorporate the proposed changes are provided in Attachment 4 for Surry and in Attachments 7 and 8 for North Anna Units 1 and 2, respectively. The elimination of PASS requirements will also be incorporated into the Improved TS (ITS) license amendment request for North Anna submitted to the NRC on December 11, 2000 (Serial No. 00-606). A marked-up ITS page reflecting the

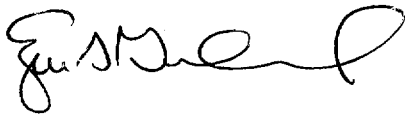
ADD1

elimination of the PASS requirements is provided in Attachment 9 for your reference. It should be noted that there are other license amendment requests for North Anna Unit 2 currently under NRC review associated with license renewal, license transfer, and the deletion of obsolete license conditions. Should any of these other license amendment requests be approved prior to the approval of this request, we will provide a revised proposed license page to the NRC Project Manager that reflects the approved change(s).

The proposed changes have been reviewed and approved by the respective Station Nuclear Safety and Operating Committees and the Management Safety Review Committee.

Commitments made as a result of this letter are provided in Attachment 10. Should you have any questions or require additional information, please contact us.

Very truly yours,



Eugene S. Grecheck
Vice President – Nuclear Support Services

Attachments:

1. Description and Assessment – Elimination of Post-Accident Sampling System Requirements - Surry Power Station Units 1 and 2
2. Description and Assessment – Elimination of Post-Accident Sampling System Requirements - North Anna Power Station Units 1 and 2
3. Mark-up of Technical Specifications – Surry Power Station Units 1 and 2
4. Proposed Technical Specifications – Surry Power Station Units 1 and 2
5. Mark-up of Technical Specifications – North Anna Power Station Unit 1
6. Mark-up of Operating License and Technical Specifications– North Anna Power Station Unit 2
7. Proposed Technical Specifications – North Anna Power Station Unit 1
8. Proposed Operating License and Technical Specifications – North Anna Power Station Unit 2
9. Mark-up of Improved Technical Specifications - North Anna Power Station Units 1 and 2
10. List of Commitments

cc: U.S. Nuclear Regulatory Commission
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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 Eugene S. Grecheck, who is Vice President - Nuclear Support Services, 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 10th day of September, 2001.

My Commission Expires: 3-31-04.

Maggie McClure
Notary Public

(SEAL)

Attachment 1

Description and Assessment

Elimination of Post-Accident Sampling System Requirements

Surry Power Station Units 1 and 2

Dominion

SURRY POWER STATION UNITS 1 AND 2

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

Virginia Electric and Power Company (Dominion) is proposing in this Technical Specification (TS) Change Request to delete TS 6.4.M, Post-Accident Sampling. This TS change request has been prepared pursuant to the requirements of 10 CFR 50.90.

2.0 DESCRIPTION

The proposed TS change request deletes the program requirements of TS 6.4.M, Post-Accident Sampling. The proposed change is consistent with the NRC approved Industry/Technical Specification Task Force Traveler, TSTF-366 (Reference 1). The availability of this Technical Specification improvement was announced in the Federal Register, Vol. 65, No. 211 (Reference 2), on October 31, 2000, as part of the NRC's Consolidated Line Item Improvement Process (CLIIP).

3.0 BACKGROUND

Westinghouse Owner's Group Topical Report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," (Reference 3) evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. WCAP-14986-A, Rev. 2, concluded that the current PASS requirements specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated.

4.0 TECHNICAL ANALYSIS

4.1 Applicability of Published Safety Evaluation

Dominion has reviewed the safety evaluation published as part of the CLIIP. This review considered the NRC staff's evaluation, as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10 and May 22, 2000) and verified applicability to Surry Power Station. Dominion has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff

are applicable to Surry Power Station, Units 1 and 2, and justify this request for the incorporation of the proposed change into the Surry Power Station Units 1 and 2 Technical Specifications.

4.2 Optional Changes and Variations

Dominion is not proposing any variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

1. Requirements for installing and maintaining a PASS were included in an NRC confirmatory order for Surry Power Station Units 1 and 2 dated March 15, 1983 (Reference 4). This TS change request includes superceding the requirements imposed by that confirmatory order.
2. As described in the model safety evaluation published on October 31, 2000, the elimination of the TS and other regulatory requirements for the PASS may result in additional changes to the TS and the associated Bases. A review of Surry's Technical Specifications and Bases indicates that they do not require any further revision beyond the deletion of TS 6.4.M.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

Dominion has reviewed the proposed no significant hazards consideration determination published on October 31, 2000 as part of the CLIP. Dominion has concluded that the proposed determination presented in the notice is applicable to Surry Power Station Units 1 and 2 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

5.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register (Reference 2) for the Technical Specification improvement, plant specific verifications were performed as follows:

1. Dominion is developing a contingency plan for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plan will be contained in station chemistry and emergency plan implementing procedures and will be implemented in accordance with the License Amendment. Establishment of the contingency plan is considered a regulatory commitment.
2. Dominion has the capability for classifying fuel damage events at the Alert Level threshold. (The level of core damage is associated with radioactivity levels of

300 uCi/gm dose equivalent iodine.) This capability is currently described in the emergency plan implementing procedures. The capability for classifying fuel damage events is considered a regulatory commitment.

3. Dominion has the capability to monitor radioactive iodines that have been released to the environs. This capability is currently described in the emergency plan implementing procedures. The capability to monitor radioactive iodines that have been released to the environs is considered a regulatory commitment.

6.0 ENVIRONMENTAL EVALUATION

Dominion has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIP. Dominion has determined that the staff's findings presented in that evaluation are applicable to Surry Power Station Units 1 and 2 and the evaluation is hereby incorporated by reference for this TS change request.

7.0 REFERENCES

1. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for Post Accident Sampling System (PASS)."
2. Federal Register, Vol. 65, No. 211, "Notice of Availability for Referencing in License Amendment Applications Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post-Accident Sampling Systems Using the Consolidated Line Item Improvement Process," dated October 31, 2000.
3. Westinghouse Owner's Group (WOG) topical report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," dated July 2000.
4. Letter from S. A. Varga of the USNRC to W. L. Stewart of Virginia Electric and Power Company dated March 15, 1983, Order Confirming Licensee Commitments on Post-TMI Related Issues, Surry Power Station Units 1 and 2.

Attachment 2

Description and Assessment

Elimination of Post-Accident Sampling System Requirements

North Anna Power Station Units 1 and 2

Dominion

NORTH ANNA POWER STATION UNITS 1 AND 2

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

Virginia Electric and Power Company (Dominion) is proposing in this Technical Specification (TS) Change Request to delete North Anna Unit 2 Operating License Condition 2.C.21.e, "Post-Accident Sampling (Section 22.3 Item II.B.3)," and North Anna Units 1 and 2 TS 6.8.4(d), Post-Accident Sampling. This TS change request has been prepared pursuant to the requirements of 10 CFR 50.90.

2.0 DESCRIPTION

The proposed TS change request deletes the following items:

- North Anna Unit 2 License Condition 2.C.21.e, which references post-TMI Action Plan Item II.B.3, Post-Accident Sampling, and stipulates the requirement for completion of the corrective actions needed to provide post-accident sampling capability and the time frame for completion,
- North Anna Units 1 and 2 TS 6.8.4(d), which stipulate the administrative requirements for the post-accident sampling program, and
- This change will also be incorporated into the ITS license amendment request submitted to the NRC on December 11, 2000 (Serial No. 00-606). Specifically, ITS section 5.5.3, Post Accident Sampling, will be deleted.

The proposed changes are consistent with the NRC approved Industry/Technical Specification Task Force Traveler, TSTF-366 (Reference 1). The availability of this Technical Specification improvement was announced in the Federal Register, Vol. 65, No. 211 (Reference 2), on October 31, 2000, as part of the NRC's Consolidated Line Item Improvement Process (CLIIP).

3.0 BACKGROUND

Westinghouse Owner's Group Topical Report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," (Reference 3) evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. WCAP-14986-A, Rev. 2, concluded that the current PASS requirements specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated.

4.0 TECHNICAL ANALYSIS

4.1 Applicability of Published Safety Evaluation

Dominion has reviewed the safety evaluation published as part of the CLIP. This review considered the NRC staff's evaluation, as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10 and May 22, 2000) and verified applicability to North Anna Power Station. Dominion has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to North Anna Power Station, Units 1 and 2, and justify this request for the incorporation of the proposed changes into the North Anna Unit 2 Operating License and the North Anna Power Station Units 1 and 2 Technical Specifications.

4.2 Optional Changes and Variations

Dominion is not proposing any variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

1. Requirements for installing and maintaining a PASS were included in an NRC confirmatory order for North Anna Power Station Unit 1 dated March 15, 1983 (Reference 4). This TS change request includes superceding the requirements imposed by that confirmatory order.
2. As described in the model safety evaluation published on October 31, 2000, the elimination of the TS and other regulatory requirements for the PASS may result in additional changes to the TS and the associated Bases. As noted above, Unit 2 Operating License Condition 2.C.21.e, which references post-TMI Action Plan Item II.B.3, Post-Accident Sampling, and stipulates the requirement for completion of the corrective actions needed to provide post-accident sampling capability and the time frame for completion, is being deleted as a part of the proposed changes. The North Anna Units 1 and 2 Technical Specifications also include a TS requiring a program for Primary Coolant Sources Outside of Containment (TS 6.8.4.a) to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious accident to as low as practical levels. However, the systems listed in that TS as being susceptible to such leakage do not include the PASS. A review of the North Anna Units 1 and 2 Operating Licenses, Technical Specifications and Bases indicates that they do not require any further revision beyond the deletion of the North Anna Unit 2 Operating License Condition 2.C.21.e and North Anna Units 1 and 2 TS 6.8.4.d (and North Anna ITS 5.5.3).

5.0 REGULATORY ANALYSIS

5.1. No Significant Hazards Determination

Dominion has reviewed the proposed no significant hazards consideration determination published on October 31, 2000 as part of the CLIP. Dominion has concluded that the proposed determination presented in the notice is applicable to North Anna Power Station Units 1 and 2 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

5.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register (Reference 2) for the Technical Specification improvement, plant specific verifications were performed as follows:

1. Dominion is developing a contingency plan for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plan will be contained in station chemistry and emergency plan implementing procedures and will be implemented in accordance with the License Amendment. Establishment of the contingency plan is considered a regulatory commitment.
2. Dominion has the capability for classifying fuel damage events at the Alert Level threshold, and this capability is described in the Emergency Plan Implementing Procedures. The capability for classifying fuel damage events is considered a regulatory commitment.
3. Dominion has the capability to monitor radioactive iodines that have been released to the environs. This capability is described in our Emergency Plan Implementing Procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

6.0 ENVIRONMENTAL EVALUATION

Dominion has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIP. Dominion has determined that the staff's findings presented in that evaluation are applicable to North Anna Power Station Units 1 and 2 and the evaluation is hereby incorporated by reference for this TS change request.

7.0 REFERENCES

1. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for Post Accident Sampling System (PASS)."

2. Federal Register, Vol. 65, No. 211, "Notice of Availability for Referencing in License Amendment Applications Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post-Accident Sampling Systems Using the Consolidated Line Item Improvement Process," dated October 31, 2000.
3. Westinghouse Owner's Group (WOG) Topical Report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," dated July 2000.
4. Letter from R. A. Clark of the USNRC to W. L. Stewart of Virginia Electric and Power Company dated March 15, 1983, Order Confirming Licensee Commitments on Post-TMI Related Issues, North Anna Power Station Unit 1.

Attachment 3

Mark-up of Technical Specifications
Surry Power Station Units 1 and 2

Dominion

L. Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital area under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

M. Post-Accident Sampling

Deleted

A program shall be established, implemented and maintained which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1. Training of personnel,
2. Procedures for sampling and analysis.
3. Procedures for maintenance of sampling and analysis equipment.

Attachment 4

Proposed Technical Specifications
Surry Power Station Units 1 and 2

Dominion

TABULATION OF CHANGES

License Nos. DPR-32 & 37 / Docket Nos. 50-280 & 281

Summary of Change:

This proposed change to the Technical Specifications is being made to eliminate the programmatic post-accident sampling system requirements.

DELETE

DATED

SUBSTITUTE

TS 6.4-7

10-15-84

TS 6.4-7

L. Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital area under accident conditions.

This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
2. Provisions for maintenance of sampling and analysis equipment.

M. Deleted

|

Attachment 5

Mark-up of Technical Specifications
North Anna Power Station Unit 1

Dominion

ADMINISTRATIVE CONTROLS

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for monitoring, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- (i) Identification of a sampling schedule for the critical variables and control points for these variables,
- (ii) Identification of the procedures used to measure the values of the critical variables,
- (iii) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser inleakage,
- (iv) Procedures for the recording and management of data,
- (v) Procedures defining corrective actions for all control point chemistry conditions, and
- (vi) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Post-Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis,
- (iii) Provisions for maintenance of sampling and analysis equipment.

Deleted

Attachment 6

Mark-up of Operating License and Technical Specifications
North Anna Power Station Unit 2

Dominion

(c) Reactor Coolant System Vents (Section 22.2 Item II.B.1)

VEPCO shall submit procedural guidelines and analytical bases for the reactor coolant system vents. The reactor coolant system vents shall be installed no later than the implementation schedule of NUREG-0737.

(d) Plant Shielding (Section 22.3 Item II.B.2)

VEPCO shall complete modifications to assure adequate access to vital areas and protection of safety equipment following an accident resulting in a degraded core no later than January 1, 1983.

(e) Post-Accident Sampling (Section 22.3 Item II.B.3)

VEPCO shall complete corrective actions needed to provide the capability to promptly obtain and perform radioisotopic and chemical analysis of reactor coolant and containment atmosphere samples under degraded core conditions without excessive exposure at the first outage of sufficient duration but no later than January 1, 1983.

(f) ^{Deleted} Relief and Safety Valve Test Requirements (Section 22.3 Item II.D.1)

VEPCO shall complete tests to qualify the reactor coolant system relief and safety valves under expected operating conditions for design basis transients and accidents no later than July 1, 1982.

(g) Auxiliary Feedwater Initiation and Indication (Section 22.3 Item II.E.1.2)

VEPCO shall implement the modification to upgrade the safety-grade indications of AFW flow from semi-vital bus power to vital bus power no later than January 1, 1981.

(h) Containment Dedicated Penetrations (Section 22.3 Item II.E.4.1)

VEPCO shall install redundant remote actuated valves in series to isolate the containment vacuum pumps from the combustible gas control system. VEPCO shall also convert the manual valves in the hydrogen recombiner piping to remote manual actuation no later than the implementation schedule of NUREG-0737.

(i) Additional Accident Monitoring Instrumentation (Section 22.3 Item II.F.1)

VEPCO shall install and demonstrate the operability of instruments for continuous indication in the control room of the following variables. Each item shall be completed by the specified date in the condition:

ADMINISTRATIVE CONTROLS

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for monitoring, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- (i) Identification of a sampling schedule for the critical variables and control points for these variables,
- (ii) Identification of the procedures used to measure the values of the critical variables,
- (iii) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser leakage, P
- (iv) Procedures for the recording and management of data,
- (v) Procedures defining corrective actions for all control point chemistry conditions, and P
- (vi) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action. P

d. Post-Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis,
- (iii) Provisions for maintenance of sampling and analysis equipment.

Deleted

Attachment 7

Proposed Technical Specifications
North Anna Power Station Unit 1

Dominion

TABULATION OF CHANGES

License No. NPF-4 / Docket No. 50-338

Summary of Change:

This proposed change to the Technical Specifications is being made to eliminate the programmatic post-accident sampling system requirements.

DELETE

DATED

SUBSTITUTE

6-13a

12-09-92

6-13a

ADMINISTRATIVE CONTROLS

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for monitoring, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- (i) Identification of a sampling schedule for the critical variables and control points for these variables,
- (ii) Identification of the procedures used to measure the values of the critical variables,
- (iii) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser inleakage,
- (iv) Procedures for the recording and management of data,
- (v) Procedures defining corrective actions for all control point chemistry conditions, and
- (vi) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Deleted

Attachment 8

Proposed Operating License and Technical Specifications
North Anna Power Station Unit 2

Dominion

TABULATION OF CHANGES

License No. NPF-7 / Docket No. 50-339

Summary of Change:

The proposed changes to the Operating License and Technical Specifications are being made to eliminate an obsolete license condition and the programmatic post-accident sampling system requirements.

DELETE

OL page 11

6-14a

DATED

08-10-82

12-09-92

SUBSTITUTE

OL page 11

6-14a

(c) Reactor Coolant System Vents (Section 22.2 Item II.B.1)

VEPCO shall submit procedural guidelines and analytical bases for the reactor coolant system vents. The reactor coolant system vents shall be installed no later than the implementation schedule of NUREG-0737.

(d) Plant Shielding (Section 22.3 Item II.B.2)

VEPCO shall complete modifications to assure adequate access to vital areas and protection of safety equipment following an accident resulting in a degraded core no later than January 1, 1983.

(e) Deleted

(f) Relief and Safety Valve Test Requirements (Section 22.3 Item II.D.1)

VEPCO shall complete tests to qualify the reactor coolant system relief and safety valves under expected operating conditions for design basis transients and accidents no later than July 1, 1982.

(g) Auxiliary Feedwater Initiation and Indication (Section 22.3 Item II.E.1.2)

VEPCO shall implement the modification to upgrade the safety-grade indications of AFW flow from semi-vital bus power to vital bus power no later than January 1, 1981.

(h) Containment Dedicated Penetrations (Section 22.3 Item II.E.4.1)

VEPCO shall install redundant remote actuated valves in series to isolate the containment vacuum pumps from the combustible gas control system. VEPCO shall also convert the manual valves in the hydrogen recombiner piping to remote manual actuation no later than the implementation schedule of NUREG-0737.

(i) Additional Accident Monitoring Instrumentation (Section 22.3 Item II.F.1)

VEPCO shall install and demonstrate the operability of instruments for continuous indication in the control room of the following variables. Each item shall be completed by the specified date in the condition:

ADMINISTRATIVE CONTROLS

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for monitoring, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- (i) Identification of a sampling schedule for the critical variables and control points for these variables,
- (ii) Identification of the procedures used to measure the values of the critical variables,
- (iii) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser inleakage,
- (iv) Procedures for the recording and management of data,
- (v) Procedures defining corrective actions for all control point chemistry conditions, and
- (vi) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Deleted

Attachment 9

Mark-up of Improved Technical Specifications
North Anna Power Station Units 1 and 2

Dominion

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Recirculation Spray, Safety Injection, Chemical and Volume Control, gas stripper, and Hydrogen Recombiner. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3 Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

Deleted

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

Attachment 10

List of Commitments

Dominion

ATTACHMENT 10

LIST OF COMMITMENTS
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2

The following table identifies those actions committed to by Dominion in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct any questions regarding these commitments to Mr. Gary D. Miller at (804) 273-2771.

COMMITMENT	Due Date/Event
Dominion will develop a contingency plan for obtaining and analyzing highly radioactive samples of the reactor coolant, containment sump, and containment atmosphere. The contingency plan will be implemented within the implementation period of the license amendment. Establishment of the contingency plan is considered a regulatory commitment.	120 days from date of issuance
Dominion has the capability for classifying fuel damage events at the Alert Level threshold. This capability is currently described in the emergency plan implementing procedures. The capability for classifying fuel damage events is considered a regulatory commitment.	Complete
Dominion has the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in our Emergency Plan Implementing Procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.	Complete