

Docket Nos. (50-338

UNITED STATES

WASHINGTON, D. C. 20555

DO NOT REMOVE

May 5, 1983

Posted Amdt.48 to NPF-4

Mr. W. L. Stewart Vice President - Nuclear Operations Virginia Electric and Power Company Post Office Box 26666 Richmond, Virginia 23261

Dear Mr. Stewart:

and 50-339

SUBJECT: RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS (RETS) FOR THE NORTH ANNA POWER STATION, UNITS NO. 1 AND NO. 2 (NA-1&2)

The Commission has issued the enclosed Amendment Nos. 48 and 31 to Facility Operating License Nos. NPF-4 and NPF-7 for the North Anna Power Station, Unit Nos. 1 and 2 (NA-1&2), respectively. The amendments consist of changes to the Technical Specifications (TS) in response to your submittal dated December 17, 1982 (Serial No. 679) as supplemented on March 3, 1983 (Serial No. 679a). The amendments are effective on issuance and must be fully implemented no later than January 1, 1984.

Based on our review and evaluation, we have determined that your proposed NA-1&2 RETS meets the requirements of Appendix I to 10 CFR Part 50 based on the guidance as provided by NUREG-0472, Revision 2, dated February 1, 1980.

In addition, you have provided as a reference document an Offsite Dose Calculation Manual (ODCM). We find that the ODCM uses documented and approved methods that are consistent with the methodology and guidelines in NUREG-0133, and therefore, is an acceptable reference. Two minor discrepancies found in our review of your ODCM should, however, be corrected in the ODCM in the next revision as follows:

- An error was found in the gaseous flow diagram, in which the main condenser air ejector effluent should be substream to the vent-vent A rather than to the vent stack A, as indicated in your ODCM.
- You have not included the process vent monitor (GW-101) in the gaseous setpoint calculation, although the monitor has been identified in the flow diagram provided in your ODCM.

Also, it is noted that you have provided as a reference document a "Process Control Program" (PCP) delineating the waste solidification process. We find that the PCP complies with NRC criteria except for oily wastes. Therefore

Mr. W. L. Stewart

the PCP is acceptable for use with TS 3.11.3 except that the PCP must be revised if oily wastes are to be soldified. We recommend, however, that a sketch or block diagram of the process control system be added to the PCP in the next revision.

Copies of the related Safety Evaluation and the Notice of Issuance are also enclosed.

Sincerely,

Leon B. Engle, Project Manager Operating Reactors Branch #3 Division of Licensing

Enclosures:

- 1. Amendment No. 48 to NPF-4
- 2. Amendment No. 31 to NPF-7
- 3. Safety Evaluation
- 4. Notice of Issuance

cc: w/enclosures See next page

Virginia Electric and Power Company

cc:

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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-338

NORTH ANNA POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 48 License No. NPF-4

1. The Nuclear Regulatory Commission (the Commission) has found that:

- A. The application for amendment by Virginia Electric and Power Company (the licensee) dated December 17, 1982 as supplemented March 3, 1983, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
- B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
- C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
- D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
- E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.D.(2) of Facility Operating License No. NPF-4 is hereby amended to read as follows:
 - (2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 48, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective on the date of issuance and must be fully implemented no later than January 1, 1984.

FOR THE NUCLEAR REGULATORY COMMISSION

 $l_{1}M^{-}$ 1 aunel Ru Robert A. Clark, Chief

✓ Robert A. Clark, Chief Operating Reactors Branch #3 Division of Licensing

Attachment: Changes to the Technical Specifications

Date of Issuance: May 5, 1983

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 48 TO FACILITY OPERATING LICENSE NO. NPF-4

DOCKET NO. 50-338

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages as indicated. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

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Appendix B Ι DELETE PART I - RADIOLOGICAL Ia (new) in its entirety 11 I۷ REPLACE the cover sheet for VIII PART II - NON-RADIOLOGICAL XI. ENVIRONMENTAL PROTECTION PLAN XII with the attached cover sheet. XIII XIV THE ENVIRONMENTAL PROTECTION PLAN XVII is now APPENDIX B. XVIII XIX ΧХ 1-1 through 1-8 (1-8 is new) 3/4 0-1 3/4 3-58 through 3/4 3-71 (new) 3/4 11-1 through 3/4 11-19 (new) 3/4 12-1 through 3/4 12-14 (new) B 3/4 3-2 B 3/4 3-4 (new) B 3/4 11-1 through B 3/4 11-6 (new) B 3/4 12-1 and B 3/4 12-2 (new) 5-1 through 5-3 6-6 6-7 · 6-10 6-11 6-12 6-13 6-23 6-19 6-24 6-20 6-25 6-21 6-26 6-22 6-27

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1.0 DEFINITIONS

CLARIFYING NOTE FOR MARGINAL LINES:

Definitions were repositioned in alphabetical order. Only those added or changed by this amendment are marginally lined.

Dispose of this informational page after incorporating changes in TS.

1.0 DEFINITIONS

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications.

ACTION

1.1 ACTION shall be that part of a Specification which prescribes remedial measures required under designated conditions.

AXIAL FLUX DIFFERENCE

1.2 AXIAL FLUX DIFFERENCE shall be the difference in normalized flux signals, expressed in % of RATED THERMAL POWER between the top and bottom halves of a two section excore neutron detector.

CHANNEL CALIBRATION

1.3 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRA-TION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated.

CHANNEL CHECK

1.4 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrumentation channels measuring the same parameter.

CHANNEL FUNCTIONAL TEST

- 1.5 A CHANNEL FUNCTIONAL TEST shall be:
 - a. Analog channels the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions.
 - b. Bistable channels the injection of a simulated signal into the sensor to verify OPERABILITY including alarm and/or trip functions.

CONTAINMENT INTEGRITY

- 1.6 CONTAINMENT INTEGRITY shall exist when:
 - 1.6.1 All penetrations required to be closed during accident conditions are either:

NORTH ANNA - UNIT 1

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- a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or
- b. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except as provided in Table 3.6-1 of Specification 3.6.3.1,
- 1.6.2 All equipment hatches are closed and sealed,
- 1.6.3 Each air lock is OPERABLE pursuant to Specification 3.6.1.3,
- 1.6.4 The containment leakage rates are within the limits of Specification 3.6.1.2, and
- 1.6.5 The sealing mechanism associated with each penetration (e.g. welds, bellows or O-rings) is OPERABLE.

CONTROLLED LEAKAGE

1.7 CONTROLLED LEAKAGE shall be that seal water flow supplied to the reactor coolant pump seals.

CORE ALTERATION

1.8 CORE ALTERATION shall be the movement or manipulation of any component within the reactor pressure vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATION shall not preclude completion of movement of a component to a safe conservative position.

DOSE EQUIVALENT I-131

1.9 The DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcurie/gram) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134 and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, "Calculation of Distance Factors for Power and Test Reactor Sites."

E - AVERAGE DISINTEGRATION ENERGY

1.10 \overline{E} shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives greater than 15 minutes, making up at least 95% of the total non-iodine activity in the coolant.

ENGINEERED SAFETY FEATURE RESPONSE TIME

1.11 The ENGINEERED SAFETY FEATURE RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ESF actuation setpoint at the channel sensor until the ESF equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays where applicable.

FREQUENCY NOTATION

1.12 The FREQUENCY NOTATION specified for the performance of Surveillance Recuirements shall correspond to the intervals defined in Table 1.2.

GASEOUS RADWASTE TREATMENT SYSTEM

1.13 A GASEOUS RADWASTE TREATMENT SYSTEM is the system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system offgases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment. The system is composed of the waste gas decay tanks, regenerative heat exchanger, waste gas charcoal filters, process vent blowers, waste gas surge tanks and waste gas diaphram compressor.

IDENTIFIED LEAKAGE

1.14 IDENTIFIED LEAKAGE shall be:

- a. Leakage (except CONTROLLED LEAKAGE) into closed systems, such as pump seal or valve packing leaks that are captured and conducted to a sump or collecting tank, or
- b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE, or
- c. Reactor coolant system leakage through a steam generator to the secondary system.

MEMBER(S) OF THE PUBLIC

1.15 MEMBER(S) OF THE PUBLIC shall include all individuals who by virtue of their occupational status have no formal association with the plant. This category shall include non-employees of the licensee who are permitted to use portions of the site for recreational, occupational, or other purposes not associated with plant functions. This category shall <u>not</u> include non-employees such as vending machine servicemen or postmen who, as part of their formal job function, occasionally enter an area that is controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

Amendment No. 16, 48

OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.16 The OFFSITE DOSE CALCULATION MANUAL shall contain the current methodology and parameters used in the calculation of offsite doses due to radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints and the specific monitoring locations of the environmental radiological monitoring program.

OPERABLE - OPERABILITY

1.17 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL MODE - MODE

1.18 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level, and average reactor coolant temperature specified in Table 1.1.

PHYSICS TESTS

1.19 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and 1) described in Chapter 14.0 of the FSAR, 2) authorized under the provisions of 10 CFR 50.59, or 3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

1.20 PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a non-isolable fault in a Reactor Coolant System component body, pipe wall or vessel wall.

PROCESS CONTROL PROGRAM (PCP)

1.21 The PROCESS CONTROL PROGRAM shall contain the current formula, sampling, analyses, tests and determinations to be made to ensure that the processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Part 20, 10 CFR Part 71 and Federal and State regulations and other requirements governing the disposal of the radioactive waste.

PURGE - PURGING

1.22 PURGE or PURGING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

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QUADRANT POWER TILT RATIO

1.23 QUADRANT POWER TILT RATIO shall be the ratio of the maximum upper excore detector calibrated output to the average of the upper excore detector calibrated outputs, or the ratio of the maximum lower excore detector calibrated output to the average of the lower excore detector calibrated outputs, whichever is greater. With one excore detector inoperable, the remaining three detectors shall be used for computing the average.

RATED THERMAL POWER

1.24 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 2775 MWt.

REACTOR TRIP SYSTEM RESPONSE TIME

1.25 The REACTOR TRIP SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its trip setpoint at the channel sensor until loss of stationary gripper coil voltage.

REPORTABLE OCCURRENCE

1.26 A REPORTABLE OCCURRENCE shall be any of those conditions specified in Specification 6.9.1.8 and 6.9.1.9.

SHUTDOWN MARGIN

1.27 SHUTDOWN MARGIN shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming all full length rod cluster assemblies (shutdown and control) are fully inserted except for the single rod cluster assembly of highest reactivity worth which is assumed to be fully withdrawn.

SITE BOUNDARY

1.28 The SITE BOUNDARY shall be that line beyond which the land is not owned, leased or otherwise controlled by the licensee.

SOLIDIFICATION

1.29 SOLIDIFICATION shall be the conversion of wet wastes into a solid form that meets shipping and burial ground requirements.

SOURCE CHECK

1.30 A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to radiation. This applies to installed radiation monitoring systems.

STAGGERED TEST BASIS

1.31 A STAGGERED TEST BASIS shall consist of:

- A test schedule for n systems, subsystems, trains or other designated components obtained by dividing the specified test interval into n equal subintervals,
- . b. The testing of one system, subsystem, train or other designated component at the beginning of each subinterval.

THERMAL POWER

1.32 THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

UNIDENTIFIED LEAKAGE

1.33 UNIDENTIFIED LEAKAGE shall be all leakage which is not IDENTIFIED LEAKAGE or CONTROLLED LEAKAGE.

UNRESTRICTED AREA

1.34 An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY where access is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

VENTILATION EXHAUST TREATMENT SYSTEM

1.35 A VENTILATION EXHAUST TREATMENT SYSTEM is the system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment (such a system is not considered to have any effect on noble gas effluents). Engineered Safety Feature (ESF) atmospheric cleanup systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

VENTING

1.36 VENTING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is not provided or required during VENTING. Vent, used in system names, does not imply a VENTING process.

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TABLE	1.1

OPERATIONAL MODES

MODE	REACTIVITY CONDITION, K	% RATED THERMAL POWER*	AVERAGE COOLANT TEMPERATURE
1. POWER OPERATION	<u>></u> 0.99	> 5%	<u>></u> 350°F
2. STARTUP	<u>></u> 0.99	<u><</u> 5%	<u>></u> 350°F
3. HOT STANDBY	< 0.99	0	<u>></u> 350°F
4. ' HOT SHUTDOWN	< 0.99	0	350°F > T > 200°F ^{avg}
5. COLD SHUTDOWN	< 0.99	0	<u><</u> 200°F
6. REFUELING**	<u><</u> 0.95	0	<u><</u> 140°F

*Excluding decay heat. **Fuel in the reactor vessel with the vessel head closure bolts less than fully | tensioned or with the head removed.

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Amendment No. 48

TABLE 1.2

FREQUENCY NOTATION

NOTATION	FREQUENCY
S	At least once per 12 hours.
D	At least once per 24 hours.
Ŵ	At least once per 7 days.
М	At least once per 31 days.
Q	At least once per 92 days.
SA	At least once per 184 days.
R	At least once per 18 months.
S/U	Prior to each reactor startup.
P	Completed prior to each release.
N.A.	Not applicable.

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Amendment No.43

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each Specification.

3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the Specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, the unit shall be placed in a MODE in which the Specification does not apply by placing it, as applicable, in:

- 1. At least HOT STANDBY within 1 hour,
- 2. At least HOT SHUTDOWN within the next 6 hours, and
- 3. At least COLD SHUTDOWN within the following 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

3.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERA-TIONAL MODES as required to comply with ACTION statements.

3.0.5 When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this Specification. Unless both conditions (1) and (2) are satisfied, the unit shall be placed in at least HOT STANDBY within 1 hour, in at least HOT SHUTDOWN within the next 6 hours, and in at least COLD SHUTDOWN within the following 30 hours. This Specification is not applicable in MODES 5 or 6.

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APPLICABILITY

SURVEILLANCE REQUIREMENTS (Continued)

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, and
- b. A total maximum combined interval time for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and Associated ACTION statements unless otherwise required by the specification. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).

NORTH ANNA - UNIT 1

INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.10 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-13 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The alarm/ trip setpoints of these channels shall be determined and adjusted in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times.

ACTION:

- a. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above Specification, without delay suspend the release of radioactive liquid effluents monitored by the affected channel or declare the channel inoperable, or change the setpoint so it is acceptably conservative.
- -b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, for reasons other than a above, take the ACTION shown in Table 3.3-13. Exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Seminannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.
- c. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.10 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-13.

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Amendment No. 48

Table .3.3-13

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	ACTION
1.	GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE		
	a. Liquid Radwaste Effluent Line	1	26
2.	GROSS BETA OR GAMMA RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE		
	a. Service Water System Effluent Line	1	26
	b. Circulating Water System Effluent Line	1	29
3.	CONTINUOUS COMPOSITE SAMPLERS AND SAMPLER FLOW MONITOR		
	a. Clarifier Effluent Line	1	26
4.	FLOW RATE MEASUREMENT DEVICES		
	a. Liquid Radwaste Effluent Line	1	27

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TABLE 3.3-13 (Continued)

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

		INSTRUMENT	MINTMUM CHANNELS OPERABLE	ACTION
5.	TANK	LEVEL INDICATING DEVICES*		
	a.	Refueling Water Storage Tanks	- 1	28
•	b.	Casing Cooling Storage Tanks	1	28
	C.	PG Water Storage Tanks**	· t	28
	d.	Boron Recovery Test Tanks**	1	28

*Tanks included in this Specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

**This is a shared system with Unit 2.

TABLE 3.3-13 (Continued)

TABLE NOTATION

- ACTION 26 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, effluent releases via this pathway may continue provided that, at least once per 12 hours, grab samples are collected and analyzed for gross radioactivity (beta or gamma) at a lower limit of detection of at least 10 microcurie/gram or an isotopic_radioactivity at a lower limit of detection of at least 5x10 microcuries/gram.
- ACTION 27 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours during actual releases. Design capacity performance curves generated in situ may be used to estimate flow.
- ACTION 28 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, liquid additions to this tank may continue provided the tank liquid level is estimated during all liquid additions to the tank.
- ACTION 29 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, make repairs as soon as possible. Grab samples cannot be obtained via this pathway.

TABLE 4	4.3-13

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

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INS	TRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
1.	GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE	:			· · ·
•	a. Liquid Radwaste Effluent Line	D	D	R	Q(1)
2.	GROSS BETA OR GAMMMA RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMAT TERMINATION OF RELEASE	S LC			
	a. Service Water System Effluent Line	D	M	. R	Q(2)
	b. Circulating Water System Effluent Line	D	М	R	Q(2)
3.	CONTINUOUS COMPOSITE SAMPLERS AND SAMPLER FLOW MONITOR				
4	a. Clarifier Effluent Line	N.A.	N.A.	R	N.A.

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INS'</u>	TRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
4.	FLOW RATE MEASUREMENT DEVICES				
	a. Liquid Radwaste Effluent Line	D(3)	N.A.	R	Q
.`	·.				
5.	TANK LEVEL INDICATING DEVICES***				
	a. Refueling Water Storage Tank	D*	N.A.	R	Q
	b. Casing Cooling Storage Tank	D*	N.A.	R	Q
	c. PG Water Storage Tanks**	D*	N.A.	R	Q
	d. Boron Recovery Storage Tanks**	D*	N.A.	R	Q
-					

*During liquid additions to the tank.

**This is a shared system with Unit 2.

***Tanks included in this Specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

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TABLE NOTATION

- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
 - 1. Instrument indicates measured levels above the alarm/trip setpoint.
 - 2. Instrument controls not set in operate mode.
- (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

1. Instrument indicates measured levels above the alarm/trip setpoint.

- 2. Instrument controls not set in operate mode.
- (3) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

INSTRUMENTATION

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.11 The radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.3-14 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.2.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the ODCM.

APPLICABILITY: As shown in Table 3.3-14.

ACTION:

- a. With a radioactive gaseous effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above Specification, without delay suspend the release of radioactive gaseous effluents monitored by the affected channel or declare the channel inoperable, or change the setpoint so it is acceptably conservative.
- b. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, for reasons other than a above, take the ACTION shown in Table 3.3-14. Exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.
- c. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.11 Each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-14.

TABLE 3.3-14

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
1.	PROCESS VENT SYSTEM			·
	a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release	1	*	31,33
	b. Iodine Sampler	1	*	31,34
	c. Particulate Sampler	1	*	31,34
· ·	d. Process Vent Flow Rate Measuring Device	1	*	30
	e. Sampler Flow Rate Measuring Devi	ce l	*	30
2.	WASTE GAS HOLDUP SYSTEM EXPLOSIVE GAS MONITORING SYSTEM (Shared with Unit 2			
	a. Hydrogen Monitor	1	**	32
	b. Oxygen Monitor	1	**	32

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TABLE 3.3-14 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
3.	CONDENSER AIR EJECTOR SYSTEM			
	a. Gross Activity Monitor	1	*	31
	b. Flow Rate Monitor	1	*	30
4.	VENTILATION VENT SYSTEM (Shared with U a. Noble Gas Activity Monitor b. Iodine Sampler c. Particulate Sampler d. Flow Rate Monitor	Init 2) 1* 1* 1* 1* 1*	* * *	31 31 31 30
	e. Sampler Flow Rate Monitor	1*	*	30

*One per vent stack.

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TABLE 3.3-14 (Continued)

TABLE NOTATION

- * At all times.
- ** During process vent system operation (treatment for primary system
 offgases).
- ACTION 30 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours.
- ACTION 31 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, effluent releases via this pathway may continue provided grab samples are taken at least once per 12 hours and these samples are analyzed for gross activity or gamma isotopic activity within 24 hours.
- ACTION 32 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, operation of this system may continue for up to 14 days provided grab samples are taken and analyzed daily. With this channel inoperable, operation may confinue provided grab samples are taken and analyzed: (1) every 4 hours during degassing operations and (2) daily during other operations.
- ACTION 33 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the Waste Gas Decay Tanks may be released to the environment provided that prior to initiating the release:
 - a. At least two independent samples of the tank's contents are analyzed, and
 - At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge valve lineup;

Otherwise, suspend release of Waste Gas Decay Tank effluents.

ACTION 34 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases from the Waste Gas Decay Tanks may continue provided samples are continuously collected with auxiliary sampling equipment as required in Table 4.11-2.

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INST	RUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
1.	PROCESS VENT SYSTEM					
,	a. Noble Gas Activity Monitor -					
.` .`	Providing Alarm and Automatic Termination of Release	D	Р	R	Q(1)	*
	b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
	c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
	d. Process Vent Flow Rate Measuring Device	D	N.A.	R	Q	*
	e. Sampler Flow Rate Monitor	D(5)	N.A.	R	N.A.	*
2.	WASTE GAS HOLDUP SYSTEM EXPLOSIVE GAS MONITORING SYSTEM					
	a. Hydrogen Monitor	D	N.A.	Q(3)	М	**
	b. Oxygen Monitor	D	N.A.	Q(4)	М	** 、

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TABLE 4.3-14

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

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RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INST	RUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
3.	CONDENSER AIR EJECTOR SYSTEM			~		
,	a. Noble Gas Activity Monitor	D	м	R -	Q(2)	* *
4	b. Flow Rate Monitor	D	N.A.	R	Q	*
4.	VENTILATION VENT SYSTEM (Shared	with Unit 2)				
	a. Noble Gas Activity Monitor	D	м	R	Q(2)	*
	b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
	c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
	d. Flow Rate Monitor	D	N.A.	R	Q	*
	e. Sampler Flow Rate Monitor	D(5)	N.A.	R	N.A.	*

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TABLE NOTATION

- * At all times other than when the line is valved out and/or locked.
- ** During process vent system operation (treatment for primary system offgases).
- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occurs if any of the following conditions exists:
 - 1. Instrument indicates measured levels above the alarm/trip setpoint.
 - 2. Instrument controls not set in operate mode.
- (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
 - 1. Instrument indicates measured levels above the alarm setpoint.
 - 2. Instrument controls not set in operate mode.
- (3) The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:
 - 1. One volume percent hydrogen, balance nitrogen, and
 - 2. Four volume percent hydrogen, balance nitrogen.
- (4) The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:
 - 1. One volume percent oxygen, balance nitrogen, and
 - 2. Four volume percent oxygen, balance nitrogen.
- (5) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic or batch releases are made.

3/4.11 RADIOACTIVE EFFLUENTS

3/4.11.1 LIQUID EFFLUENTS

CONCENTRATION

LIMITING CONDITION FOR OPERATION

3.11.1.1 The concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (see Figure 5.1-1) shall be limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2×10^{-4} microcuries/ml.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS exceeding the above limits, without delay restore the concentration to within the above limits.
- b. The provisions of Specification 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.1.1 Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11-1.

4.11.1.1.2 The results of the radioactivity analyses shall be used in accordance with the methods in the ODCM to assure that the concentrations at the point of release are maintained within the limits of Specification 3.11.1.1.

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TABLE 4.11-1

Liquid Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detectior (LLD) ^a (mCi/ml)
A. Batch Releases ^b ,g	n 07		Principal Gamma Emitters	5x10 ⁻⁷
			I-131	1x10 ⁻⁶
	P One Batch/M	М	Dissolved and Entrained Gases (Gamma Emitters)	1x10 ⁻⁵
	<u></u> Р	M d	Н-3	1x10 ⁻⁵
	Each Batch	Composited	Gross Alpha	1x10 ⁻⁷
	P Each Batch	Q Composite ^d	Sr-89, Sr-90	5x10 ⁻⁸
	Latin Battin	·	Fe-55	1x10 ⁻⁶
B. Continuous Releases	Continuous ^f	W Composite ^f	Principal Gamma Emitters	5x10 ⁻⁷
			1-131	1x10 ⁻⁶
			Dissolved and Entrained Gases (Gamma Emitters)	1x10 ⁻⁵
	f	Mf	H-3	1×10 ⁻⁵
	Continuous	Composite	Gross Alpha	1x10 ⁻⁷
	f	Q f	Sr-89, Sr-90	5x10 ⁻⁸
	Continuous ^f	Compositef	Fe-55	1x10 ⁻⁶

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

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Amendment No. 🔬 🕄

TABLE NOTATION

^aThe LLD is defined, for purposes of these Specifications, as the smallest concentration of radioactive material in a sample that will yield a net count (above system background) that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

. For a particular measurement system (which may include radiochemical separation):

$$LLD = \frac{4.66 \text{ s}_{b}}{\text{E} \cdot \text{V} \cdot 2.22 \times 10^{6} \cdot \text{Y} \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD is the "a priori" lower limit of detection as defined above (as microcuries per unit mass or volume),

s, is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (as counts per minute),

E is the counting efficiency (as counts per disintegration),

V is the sample size (in units of mass or volume),

 2.22×10^6 is the number of disintegrations per minute per microcurie,

Y is the fractional radiochemical yield (when applicable),

 $\boldsymbol{\lambda}$ is the radioactive decay constant for the particular radionuclide, and,

 Δt for plant effluents is the elapsed time between the midpoint of sample collection and time of counting.

Typical values of E, V, Y, and Δt should be used in the calculation.

TABLE NOTATION

It should be recognized that the LLD is defined as an <u>a priori</u> (before the fact) limit representing the capability of a measurement system and not as an <u>a posteriori</u> (after the fact) limit for a particular measurement.

^bA batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses, each batch shall be isolated, and then thoroughly mix as the situation permits, to assure representative sampling.

- ^CThe principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141, and Ce-144. This list does not mean that only these nuclides are to be detected and reported. Other peaks that are measurable and identifiable at levels exceeding the LLD, together with the above nuclides, shall also be identified and reported.
- ^d A composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged and in which the method of sampling employed results in a specimen that is representative of the liquids released.
- ^eA continuous release is the discharge of liquid wastes of a nondiscrete volume, e.g., from a volume of a system that has an input flow during the continuous release.

^fTo be representative of the quantities and concentrations of radioactive materials in liquid effluents, samples shall be collected continuously in proportion to the rate of flow of the effluent stream. Prior to analyses, all samples taken for the composite shall be thoroughly mixed in order for the composite sample to be representative of the effluent release.

^gWhenever the secondary coolant activity exceeds 10⁻⁵ uCi/ml the turbine building sump pumps shall be placed in manual operation and samples shall be taken and analyzed prior to release. Secondary coolant activity samples shall be collected and analyzed on a weekly basis. These samples are analyzed for gross activity or gamma isotopic activity within 24 hours.

NORTH ANNA - UNIT 1

DOSE

LIMITING CONDITION FOR OPERATION

3.11.1.2 The dose or dose commitment to the maximum exposed MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each reactor unit, to UNRESTRICTED AREAS (see Figure 5.1-1) shall be limited:

- a. During any calendar quarter to less than or equal to 1.5 mrems to the total body and to less than or equal to 5 mrems to the critical organ,* and
- b. During any calendar year to less than or equal to 3 mrems to the total body and to less than or equal to 10 mrems to the critical organ.*

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.2 <u>Dose' Calculations</u>. Cumulative dose contributions from liquid effluents shall be determined in accordance with the ODCM at least once per 31 days.

*The maximum exposed MEMBER OF THE PUBLIC and the critical organ is addressed in the ODCM.

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LIQUID RADWASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.1.3 The liquid radwaste ion exchanger system shall be used to reduce the radioactive materials in liquid wastes prior to their discharge when the projected doses due to the liquid effluent, from each reactor unit, to UNRESTRICTED AREAS (see Figure 5.1-1) would exceed 0.06 mrem to the total body or 0.2 mrem to the critical organ* in a 31 day period.

APPLICABILITY: At all times.

ACTION:

- a. With radioactive liquid waste being discharged without treatment and in excess of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report that includes the following information:
 - 1. Explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or sub-systems, and the reason for the inoperability,
 - 2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and
 - 3. Summary description of ACTION(s) taken to prevent a recurrence.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.3.1 Doses due to liquid releases shall be projected at least once per 31 days in accordance with the ODCM.

*The critical organ is addressed in the ODCM.

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATION

3.11.1.4 The quantity of radioactive material contained in each of the following unprotected outdoor tanks shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases.

- a. Refueling Water Storage Tank
- b. Casing Cooling Storage Tank
- c. PG Water Storage Tank*
- d. Boron Recovery Test Tank*
- e. Any Outside Temporary Tank**

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.4 The quantity of radioactive material contained in each of the above listed tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per week when radioactive materials are being added to the tank.

*This is a shared system with Unit 2.

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^{**}Tanks included in this Specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste ion exchanger system.

3/4.11.2 GASEOUS EFFLUENTS

DOSE RATE

LIMITING CONDITION FOR OPERATION

3.11.2.1 The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1-1) shall be limited to the following:

- a. For noble gases: Less than or equal to 500 mrems/yr to the total body and less than or equal to 3000 mrems/yr to the skin, and
- b. For iodine-131, for tritium, and for all radionuclides in particulate form with half lives greater than 8 days: Less than or equal to 1500 mrems/yr to the critical organ.*

APPLICABILITY: At all times.

ACTION:

- a. With the dose rate(s) exceeding the above limits, without delay restore the release rate to within the above limit(s).
- b. The provisions of Specification 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.1.1 The dose rate due to noble gases in gaseous effluents shall be determined continuously to be within the above limits in accordance with the methods and procedures of the ODCM.

4.11.2.1.2 The dose rate due to iodine-131, tritium, and all radionuclides in particulate form with half lives greater than 8 days, in gaseous effluents shall be determined to be within the above limits in accordance with the methods and procedures of the ODCM by obtaining representative samples and performing analyses in accordance with the sampling and analysis program specified in Table 4.11-2.

*The critical organ is defined in the ODCM.

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TABLE 4.11-2

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

	eous Release Type	Sampling Frequency	Ninimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) ⁶ (uCi/ml)
Δ.	Waste Gas Storage Tank	P Each Tank Grab Sample	P Each Tank	Principal Gamma Emitters ^b	1x10 ⁻⁴
в.	Containment PURGE	P Each PURGE Grab	P Each PURGE	Principal Gamma Emitters ^b	1×10 ⁻⁴
		Sample		H-3	1×10^{-6}
с.	Process Vent Vent. Vent A Vent. Vent B	N ^{c,d,e} Grab Sample	M ^C	Principal Gamma Emitters ^{b'}	1×10^{-4}
	vent. vent b	Dampie		11-3	1x10 ⁻⁶
D.	All Release Types as listed in A, B, C above.	Continuous ^d	W ^e Charcoal Sample	I-131	1×10 ⁻¹²
·	C above.	Continuous ^d	W ^e Particulate Sample	Principal Gamma Emitters ^b	1x10 ⁻¹¹
		Continuous	M Composite Particulate Sample	Gross Alpha	1×10 ⁻¹¹
		d Continuous	Q Composite Particulate Sample	Sr-89, Sr-90	1×10 ⁻¹¹
	•	Continuous	Noble Gas Monitor	Noble Gases Gross Beta or Gamma	1×10 ⁻⁶

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RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

Gaseous Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) ^a (uCi/ml)
E. Condenser Air Ejector	W	W	Principle Gamma Emitters ^g	1×10 ⁻⁴
	Grab Sample		H-3	1×10^{-6}
Steam Generator Blowdown Vent			11 5	

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TABLE NOTATION

^aThe LLD is defined, for purposes of these Specifications, as the smallest concentration of radioactive material in a sample that will yield a net count (above system background) that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system (which may include radiochemical separation):

LLD = $\frac{4.66 \text{ s}_{b}}{\text{E} \cdot \text{V} \cdot 2.22 \times 10^{6} \cdot \text{Y} \cdot \exp(-\lambda \Delta t)}$

Where:

LLD is the "a priori" lower limit of detection as defined above (as microcuries per unit mass or volume),

s. is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (as counts per minute),

E is the counting efficiency (as counts per disintegration),

V is the sample size (in units of mass or volume),

2.22 x 10⁶ is the number of disintegrations per minute per microcurie,

Y is the fractional radiochemical yield (when applicable),

 λ is the radioactive decay constant for the particular radionuclide, and,

At for plant effluents is the elapsed time between the midpoint of sample collection and time of counting.

Typical values of E, V, Y, and At should be used in the calculation.

TABLE NOTATION

It should be recognized that the LLD is defined as an <u>a priori</u> (before the fact) limit representing the capability of a measurement system and not as an <u>a posteriori</u> (after the fact) limit for a particular measurement.

^bThe principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, Xe-135m, and Xe-138 for gaseous emissions and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141 and Ce-144 for particulate emissions. This list does not mean that only these nuclides are to be detected and reported. Other peaks that are measurable and identifiable, at levels exceeding the LLD together with the above nuclides, shall also be identified and reported.

^CSampling and analysis shall also be performed following shutdown, startup, and whenever a THERMAL POWER change exceeding 15 percent of the RATED THERMAL POWER occurs within a one hour period, if (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant is greater than 1.0 uCi/gm; and (2) the noble gas activity monitor shows that effluent activity has increased by more than a factor of 3.

^dThe ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Specifications 3.11.2.1, 3.11.2.2 and 3.11.2.3.

^eSamples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing (or after removal from sampler). Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup or THERMAL POWER change exceeding 15 percent of RATED THERMAL POWER in one hour and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement applies if (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant is greater than 1.0 uCi/gm and; (2) the noble gas monitor shows that effluent activity has increased more than a factor of 3.

^fWhenever the secondary coolant activity exceeds 10⁻⁵ uCi/ml, samples shall be obtained and analyzed weekly. The turbine building sump pumps shall be placed in manual operation and samples shall be taken and analyzed prior to release. Secondary coolant activity samples shall be collected and analyzed on a weekly basis. These samples are analyzed for gross activity or gamma isotopic activity within 24 hours.

^gThe principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, Xe-135m, and Xe-138 for gaseous emissions. This list does not mean that only these nuclides are to be detected and reported. Other peaks that are measurable and identifiable, at levels exceeding the LLD together with the above nuclides, shall also be identified and reported.

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DOSE - NOBLE GASES

LIMITING CONDITION FOR OPERATION

3.11.2.2 The air dose due to noble gases released in gaseous effluents, from each reactor unit, from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1-1) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 5 mrads for gamma radiation and less than or equal to 10 mrads for beta radiation and,
- b. During any calendar year: Less than or equal to 10 mrads for gamma radiation and less than or equal to 20 mrads for beta radiation.

APPLICABILITY: At all times.

ACTION

- a. With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.2 <u>Dose Calculations</u> Cumulative dose contributions for noble gases for the current calendar quarter and current calendar year shall be determined in accordance with the ODCM at least once per 31 days.

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DOSE - IODINE-131, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

LIMITING CONDITION FOR OPERATION

3.11.2.3 The dose to the maximum exposed MEMBER OF THE PUBLIC from iodine-131, from tritium, and from all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released, from each reactor unit, from the site to UNRESTRICTED AREAS (see Figure 5.1-1) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 7.5 mrems to the critical organ* and,
- b. During any calendar year: Less than or equal to 15 mrems to the critical organ*.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of iodine-131, tritium, and radionuclides in particulate form with half lives greater than 8 days, in gaseous effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.3 <u>Dose Calculations</u> Cumulative dose contributions for the current calendar quarter and current calendar year for iodine-131, tritium and radionuclides in particulate form with half lives greater than 8 days shall be determined in accordance with the ODCM at least once per 31 days.

*The critical organ is addressed in the ODCM.

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GASEOUS RADWASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.2.4 The GASEOUS RADWASTE TREATMENT SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected gaseous effluent air doses due to gaseous effluent releases, from each reactor unit, from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1-1) would exceed 0.2 mrad for gamma radiation and 0.4 mrad for beta radiation over 31 days. The VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases, from each reactor unit, from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1-1) would exceed 0.3 mrem to the critical organ* over 31 days.

APPLICABILITY: At all times.

ACTION:

- a. With gaseous waste being discharged without treatment and in excess of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that includes the following information:
 - 1. Explanation of why gaseous radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,
 - 2. ACTION(s) taken to restore the inoperable equipment to OPERABLE status, and
 - 3. Summary description of ACTION(s) taken to prevent a recurrence.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.4.1 Doses due to gaseous releases from the site shall be projected at least once per 31 days in accordance with the ODCM.

*The critical organ is addressed in the ODCM.

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EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

3.11.2.5 The concentration of oxygen in the waste gas decay tanks shall be limited to less than or equal to 2% by volume whenever the hydrogen concentration exceeds 4% by volume and is less than 96% by volume.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of oxygen in the waste ges decay tanks greater than 2% by volume but less than or equal to 4% by volume, reduce the oxygen concentration to the above limits within 48 hours.
- b. With the concentration of oxygen in the waste gas decay tanks greater than 4% volume and the hydrogen concentration greater than 2% by volume, immediately suspend all additions of waste gases to the system and reduce the concentration of oxygen to less than or equal to 2% by volume without delay.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.5 The concentrations of hydrogen and oxygen in the waste gas decay tanks shall be determined to be within the above limits by continuously monitoring the waste gases in the waste gas decay tanks with the hydrogen and oxygen monitors required OPERABLE by Table 3.3-13 of Specification 3.3.3.11.

GAS STORAGE TANKS

LIMITING CONDITION FOR OPERATION

3.11.2.6 The quantity of radioactivity contained in each gas storage tank shall be limited to less than or equal to $\leq 25,000$ curies noble gases (considered as Xe-133).

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any gas storage tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.6 The quantity of radioactive material contained in each gas storage tank shall be determined to be within the above limit at least once per month when the specific activity of the primary reactor coolant is ≤ 1.0 uCi/gm DOSE EQUIVALENT I-131. Under conditions which result in a specific activity > 1.0 uCi/gm DOSE EQUIVALENT I-131, the Gas Storage Tank(s) shall be sampled once per 24 hours, when radioactive materials are being added to the tank.

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3/4.11.3 SOLID RADIOACTIVE WASTE

LIMITING CONDITION FOR OPERATION

3.11.3 SOLIDIFICATION shall be conducted in accordance with a PROCESS CONTROL PROGRAM.

APPLICABILITY: At all times.

ACTION:

- a. With the provisions of the PROCESS CONTROL PROGRAM not satisfied, suspend shipments of defectively processed or defectively packaged solid radioactive wastes from the site.
- b. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.3.1 The PROCESS CONTROL PROGRAM shall be used to verify the SOLIDIFICATION of at least one representative test specimen from at least every tenth batch of each type of wet radioactive waste (e.g., filter sludges, spent resins, evaporator bottoms, boric acid solutions, and sodium sulfate solutions).

- a. If any test specimen fails to verify SOLIDIFICATION, the SOLIDIFICATION of the batch under test shall be suspended until such time as additional test specimens can be obtained, alternate SOLIDIFICATION parameters can be determined in accordance with the PROCESS CONTROL PROGRAM, and a subsequent test verifies SOLIDIFICA-TION. SOLIDIFICATION of the batch may then be resumed using the alternative SOLIDIFICATION parameters determined by the PROCESS CONTROL PROGRAM.
- b. If the initial test specimen from a batch of waste fails to verify SOLIDIFICATION, the PROCESS CONTROL PROGRAM shall provide for the collection and testing of representative test specimens from each consecutive batch of the same type of wet waste until at least 3 consecutive initial test specimens demonstrate SOLIDIFICATION. The PROCESS CONTROL PROGRAM shall be modified as required, as provided in Specification 6.13, to assure SOLIDIFICATION of subsequent batches of waste.

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3/4.11.4 TOTAL DOSE

LIMITING CONDITION FOR OPERATION

3.11.4 The annual (calendar year) dose or dose commitment to the maximum exposed MEMBER OF THE PUBLIC due to releases of radioactivity and radiation, from uranium fuel cycle sources shall be limited to less than or equal to 25 mrems to the total body or the critical organ* (except the thyroid, which shall be limited to less than or equal to 75 mrems).

APPLICABILITY: At all times.

ACTION:

With the calculated doses from the release of radioactive materials a. in liquid or gaseous effluents exceeding twice the limits of Specification 3.11.1.2.a, 3.11.1.2.b, 3.11.2.2.a, 3.11.2.2.b, 3.11.2.3.a, or 3.11.2.3.b, calculations should be made to determine whether the above limits of Specification 3.11.4 have been exceeded. If such is the case, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits. This Special Report, as defined in 10 CFR Part 20.405c, shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits, and if the release condition resulting in violation of 40 CFR Part 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.4 <u>Dose Calculations</u> Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Specifications 4.11.1.2, 4.11.2.2, and 4.11.2.3, and in accordance with the ODCM.

*The critical organ is addressed in the ODCM.

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3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.1 MONITORING PROGRAM

LIMITING CONDITION FOR OPERATION

3.12.1 The radiological environmental monitoring program shall be conducted as specified in Table 4.12-1.

APPLICABILITY: At all times.

ACTION:

- a. With the radiological environmental monitoring program not being conducted as specified in Table 4.12-1, in lieu of a Licensee Event Report, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Specification 6.9.1.11, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.
- b. With the level of radioactivity as the result of plant effluents in an environmental sampling medium at a specified location exceeding the reporting levels of Table 4.12-2 when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines, the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose to A MEMBER OF THE PUBLIC is less than the calendar year limits of Specifications 3.11.1.2, 3.11.2.2, and 3.11.2.3. When more than one of the radionuclides in Table 4.12-2 are detected in the sampling medium, this report shall be submitted if:

 $\frac{\text{concentration (1)}}{\text{reporting level (1)}} + \frac{\text{concentration (2)}}{\text{reporting level (2)}} + \dots \ge 1.0$

When radionuclides other than those in Table 4.12-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose to a MEMBER OF THE PUBLIC is equal to or greater than the calendar year limits of Specifications 3.11.1.2, 3.11.2.2 and 3.11.2.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report.

c. With milk or fresh leafy vegetable samples unavailable from one or more of the sample locations required by Table 4.12-1, identify locations for obtaining replacement samples and add them to the radiological environmental monitoring program within 30 days. The specific locations from which samples were unavailable may then be

RADIOLOGICAL ENVIRONMENTAL MONITORING

deleted from the monitoring program. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.12, identify the cause of the unavailability of samples and identify the new location(s) for obtaining replacement samples in the next Semiannual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

d. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.1.1 The radiological environmental monitoring samples shall be collected pursuant to Table 4.12-1 from the specific locations given in the table and figure(s) in the ODCM and shall be analyzed pursuant to the requirements of Table 4.12-1, the detection capabilities required by Table 4.12-3, and the guidance of the Radiological Assessment Branch Technical Position on Environmental Monitoring dated November, 1979, Revision No. 1.

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TABLE 4.12-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM*

Exposure Pathway and/or Sample

Number of Samples and Sample Locations

DIRECT RADIATION

36 routine monitoring stations either with two or more dosimeters or with one instrument for measuring and recording dose rate continuously to be placed as follows: 1) an inner ring of stations, one in each meteorological sector within the SITE BOUNDARY; an outer ring of stations, one in each meteorological sector within 8 km range from the site; the balance of the stations to be placed in special interest areas such as population centers, nearby residences, schools, and in 1 or 2 areas to serve as control stations.

Sampling and **Collection Frequency**

Ouarterly

Type and Frequency of Analysis

Gamma dose quarterly.

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Radioiodine and Particulates

Samples from 5 locations:

3 samples from close a. to the 3 SITE BOUNDARY locations (in different sectors) of the highest calculated historical annual average groundlevel D/Q.

Continuous sampler (2/3 running time cycle), operation with sample collection weekly.

Radioiodine Cannister: I-131 analysis weekly.

Particulate Sampler: Gross beta radioactivity analysis following filter change;^c Gamma isotopic analysis of composite (by

*The number, media, frequency, and location of samples may vary from site to site. This table presents an acceptable minimum program for a site at which each entry is applicable. Local site characteristics must be examined to determine if pathways not covered by this table may significantly contribute to an individual's dose and should be included in the sampling program.

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RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

	osure Pathway nd/or Sample	Number of Samples and Sample Locations ^a	Sampling and Collection Frequency	Type and Frequency of Analysis
	÷	b. I sample from the vicinity of a community having the highest calculated annual average groundlevel D/Q.		location) quarterly.
		c. 1 sample from a control location 15-30 km distant and in the least prevalent wind direction.		
. 3.	WATERBORNE			Gamma isotopic analysis
	a. Surface	a. l sample circulating water discharge	Sample off upstream, downstream and cooling lagoon.	monthly. Composite for tritium analysis quarterly.
			Grab Monthly.	
	b. Ground	Samples from 1 or 2 sources only if likely to be affected.	Grab Quarterly	Gamma isotopic and tritium analysis quarterly.
	c. Sediment	l sample from downstream area with existing or potential recreational value.	Semiannually	Gamma isotopic analysis ^d semiannually.

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RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

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Exposure Pathway and/or Sample	Number of Samples and Sample Locations ^a	Sampling and Collection Frequency	Type and Frequency of Analysis
4. INGESTION		•	
a. Milk ^f a.	Samples from milking animals in 3 locations within 5 km distance having the highest dose potential. If there are none, then, 1 sample from milking animals in each of 3 areas between 5 to 8 km distant where doses are cal- culated to be greater than 1 mrem per yr.	Monthly at all times.	Gamma isotopic ^d and I-131 analysis monthly .
b.	l sample from milking animals at a control location (15-30 km distant and in the least pre- valent wind direction).		
b. Fish and a. Invertebrates	l sample of commercially and recreationally important species (bass, sunfish, catfish) in vicinity of plant discharge area.	Semiannually.	Gamma isotopic analysis on edible portions.
b.	l sample of same species in areas not influenced by plant discharge.		

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RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample		Number of Samples and Sample Locations ^a	Sampling and Collection Frequency	Type and Frequency of Analysis
c. Food , Products (cont'd)	а.	Samples of an ediable broad leaf vegetation grown nearest each of two different offsite locations of highest predicted historical annual average ground- level D/Q if milk samp- ling is not performed.	Monthly if available, or at harvest.	Gamma isotopic ^d and I-131 analysis.
	b.	1 Charad loof	Monthly if available, or at harvest.	Gamma isotopic ^d and I-131 analysis.

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TABLE NOTATION

^aSpecific parameters of distance and direction sector from the centerline of one reactor, and additional description where pertinent, shall be provided for each and every sample location in Table 4.12-1 in a table and figure(s) in the ODCM. Refer to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Flants, "October 1978, and to Radiological Assessment Branch Technical Positions, Revision 1, November 1979. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.11.1. It is recognized that, at times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances suitable alternative media and locations may be chosen for the particular pathway in question and appropriate substitutions made within 30 days in the radiological environmental monitoring program. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.12, identify the cause of the unavailability of samples for that pathway and identify the new location(s) for obtaining replacement samples in the next Semiannual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

^bOne or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. For the purposes of this table, a thermoluminescent dosimeter (TLD) is considered to be one phosphor; two or more phosphors in a packet are considered as two or more dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation. The 40 stations is not an absolute number. The number of direct radiation monitoring stations may be reduced according to geographical limitations; e.g., at an ocean site, some sectors will be over water so that the number of dosimeters may be reduced accordingly. The frequency of analysis or readout for TLD systems will depend upon the characteristics of the specific system used . and should be selected to obtain optimum dose information with minimal fading.

TABLE 4.12-1 (Continued)

TABLE NOTATION

^CAirborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than ten times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.

d Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.

^eThe dose shall be calculated for the maximum organ and age group, using the methodology and parameters in the ODCM.

^fIf milk sampling cannot be performed, use item 4.c.

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Reporting Levels							
Analysis	Water (pCi/ ^g)	Airborne Particulate or Gases (pCi/m)	Fish (pCi/kg, wet)	Milk (pCi/g)	Food Products (pCi/kg, wet)		
H3	30,000						
Mn-54	1,000		30,000				
Fe-59	400		10,000				
Co-58	1,000		30,000				
Co-60	300		10,000				
Zn-65	300		20,000				
Zr-Nb-95	400						
1-131	2	0.9		3	100		
Cs-134	30	10	1,000	60	1,000		
Cs-137	50	20	2,000	70	2,000		
Ba-La-140	200			300			

TABLE 4.12-2

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		TABLE 4.12-3				
		DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS ^a				
Analysis	Water (pCi/l)	Airborne Particylate or Gas (pCi/m)	DF DETECTION (LLD) Fish (pCi/kg,wet)	Milk (pCi/%)	Food Products (pCi/kg,wet)	Sediment (pCi/kg,dry
gross beta	4	0.01				
H-3	3000				•	
Mn-54	15		130			
Fe-59	30		260			
Co-58,60	15		130			
Zn-65	30		260			
Zr-Nb-95	15					
1-131	10 [*]	0.07		1	60	150
Cs-134	15	0.05	130	15	60	150
Cs-137	18	0.06	150	18	80	180
Ba-La-140	15			15		· · · · · · · · · · · · · · · · · · ·

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*The LLD for gamma isotopic analysis shall be used.

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TABLE 4.12-3 (Continued)

TABLE NOTATION

^aThis list does not mean that only these nuclides are to be considered. Other peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.

^bThe LLD is defined, for purposes of these Specifications, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system, which may include radiochemical separation):

$$LLD = \frac{4.66 \text{ s}_{b}}{\text{E} \cdot \text{V} \cdot 2.22 \cdot \text{Y} \cdot \exp(-\lambda Lt)}$$

Where:

LLD is the "a priori" lower limit of detection as defined above, as picocuries per unit mass or volume,

s. is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute,

E is the counting efficiency, as counts per disintegration,

V is the sample size in units of mass or volume,

2.22 is the number of disintegrations per minute per picocurie,

Y is the fractional radiochemical yield, when applicable,

 λ is the radioactive decay constant for the particular radionuclide, and

 Δt for environmental samples is the elapsed time between sample collection, or end of the sample collection period, and time of counting

Typical values of E, V, Y and Δt should be used in the calculation.

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TABLE 4.12-2 (Continued)

TABLE NOTATION

It should be recognized that the LLD is defined as an <u>a priori</u> (before the fact) limit representing the capability of a measurement system and not as an <u>a posteriori</u> (after the fact) limit for a particular measurement. Analysis shall be performed in such a manner that the stated LLDs will be achieved under routine conditions. Occasionally background fluctuations, unavoidably small sample sizes, the presence of interfering nuclides, or other uncontrollable circumstances may render these LLDs unachievable. In such cases, the contributing factors will be identified and described in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.

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RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.2 LAND USE CENSUS

LIMITING CONDITION FOR OPERATION

3.12.2 A land use census shall be conducted and shall identify within a distance of 8 km (5 miles) the location in each of the 16 meteorological sectors of the nearest milk animal, the nearest residence and the nearest garden* of greater than 50 m² (500 ft²) producing broad leaf vegetation.

APPLICABILITY: At all times.

ACTION:

- a. With a land use census identifying a location(s) that yields a calculated dose or dose commitment greater than the values currently being calculated in Specification 4.11.2.3, in lieu of a Licensee Event Report, identify the new location(s) in the next Semiannual Radioactive Effluent Release Report, pursuant to Specification 6.9.1.12.
- b. With a land use census identifying a location(s) that yields a calculated dose or dose commitment (via the same exposure pathway) 25 percent greater than at a location from which samples are currently being obtained in accordance with Specification 3.12.1, add the new location(s) to the radiological environmental monitoring program within 30 days. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may be deleted from this monitoring program after (October 31) of the year in which this land use census was conducted. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.12, identify the new location(s) in the next Semiannual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.2 The land use census shall be conducted during the growing season at least once per 12 months using that information that will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities. The results of the land use census shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.

^{*}Broad leaf vegetation sampling of at least three different kinds of vegetation may be performed at the site boundary in each of two different direction sectors with the highest predicted D/Qs in lieu of the garden census. Specifications for broad leaf vegetation sampling in Table 4.12-1.4c shall be followed, including analysis of control samples.

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.3 INTERLABORATORY COMPARISON PROGRAM

LIMITING CONDITION FOR OPERATION

3.12.3 Analyses shall be performed on radioactive materials (which contain nuclides produced at nuclear power stations) supplied as part of an Interlaboratory Comparison Program, described in the ODCM, that has been approved by the Commission.

APPLICABILITY: At all times.

ACTION:

- a. With analyses not being performed as required above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.3 A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be maintained as described in the ODCM.

3/4.3 INSTRUMENTATION

BASES

3/4.3.1 and 3/4.3.2 PROTECTIVE AND ENGINEERED SAFETY FEATURES (ESF) INSTRUMENTATION

The OPERABILITY of the protective and ESF instrumentation systems and interlocks ensure that 1) the associated ESF action and/or reactor trip will be initiated when the parameter monitored by each channel or combination thereof exceeds its setpoint, 2) the specified coincidence logic is maintained, 3) sufficient redundancy is maintained to permit a channel to be out of service for testing or maintenance, and 4) sufficient system functional capability is available for protective and ESF purposes from diverse parameters.

The OPERABILITY of these systems is required to provide the overall reliability, redundance and diversity assumed available in the facility design for the protection and mitigation of accident and transient conditions. The integrated operation of each of these systems is consistent with the assumptions used in the accident analyses.

The surveillance requirements specified for these systems ensure that the overall system functional capability is maintained comparable to the original design standards. The periodic surveillance tests performed at the minimum frequencies are sufficient to demonstrate this capability.

The measurement of response time at the specified frequencies provides assurance that the protective and ESF action function associated with each channel is completed within the time limit assumed in the accident analyses. No credit was taken in the analyses for those channels with response times indicated as not applicable.

Response time may be demonstrated by any series of sequential, overlapping or total channel test measurements provided that such tests demonstrate the total channel response time as defined. Sensor response time verification may be demonstrated by either 1) in place, onsite or offsite test measurements or 2) utilizing replacement sensors with certified response times.

3/4.3.3 MONITORING INSTRUMENTATION

3/4.3.3.1 RADIATION MONITORING INSTRUMENTATION

The OPERABILITY of the radiation monitoring channels ensures that 1) the radiation levels are continually measured in the areas served

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RADIATION MONITORING INSTRUMENTATION (Continued)

by the individual channels and 2) the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded.

3/4.3.3.2 MOVABLE INCORE DETECTORS

The OPERABILITY of the movable incore detectors with the specified minimum complement of equipment ensures that the measurements obtained from use of this system accurately represent the spatial neutron flux distribution of the reactor core. The OPERABILITY of this system is demonstrated by irradiating each detector used and normalizing its respective output.

For the purpose of measuring $F_0(Z)$ or F_{AH}^N , a full incore flux map is used. Quarter-core flux maps, as defined in WCAP-8648, June 1976, may be used in recalibration of the excore neutron flux detection system, and full incore flux maps or symmetric incore thimbles may be used for monitoring the QUADRANT POWER TILT RATIO when one Power Range Channel is inoperable.

3/4.3.3.3 SEISMIC INSTRUMENTATION

The OPERABILITY of the seismic instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix "A" of 10 CFR Part 100. The instrumentation is generally consistent with the recommendations of Regulatory Guide 1.12, "Instrumentation for Earthquakes," April 1974.

3/4.3.3.4 METEOROLOGICAL INSTRUMENTATION

The OPERABILITY of the meteorological instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public and is consistent with the recommendations of Regulatory Guide 1.23, "Onsite Meteorological Programs," February 1972. A meteorological data collection program as described above is necessary to meet the requirements of subparagraph 50.36(a)(2) of 10 CFR Part 50, Appendix E to 10 CFR Part 50, and 10 CFR Part 51.

3/4.3.3.5 AUXILIARY SHUTDOWN PANEL MONITORING INSTRUMENTATION

The OPERABILITY of the remote shutdown instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT STANDBY of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criterion 19 of 10 CFR 50...

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3/4.3.3.6 POST-ACCIDENT INSTRUMENTATION

The OPERABILITY of the post-accident instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident.

3/4.3.3.7 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages. Prompt detection of fires will reduce the potential for damage to safety related equipment and is an integral element in the overall facility fire protection program.

In the event that a portion of the fire detection instrumentation is inoperable, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to OPERABILITY.

3/4.3.3.8 AXIAL POWER DISTRIBUTION MONITORING SYSTEM (APDMS)

OPERABILITY of the APDMS ensures that sufficient capability is available for the measurement of the neutron flux spatial distribution within the reactor core. This capability is required to (1) monitor the core flux patterns that are representative of the peak core power density, and (2) limit the core average axial power profile such that the total power peaking factor F_Q is maintained within acceptable limits.

3/4.3.3.9 LOOSE PARTS MONITORING SYSTEM

OPERABILITY of the Loose Parts Monitoring System provides assurance that loose parts within the RCS will be detected. This capability is designed to ensure that loose parts will not collect and create undesirable flow blockages.

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3/4.3.3.9 RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents during actual or potential releases of liquid effluents. The alarm/ trip setpoints for these instruments shall be calculated and adjusted in accordance with the procedures in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50. The purpose of tank level indicating devices is to assure the detection and control of leaks that if not controlled could potentially result in the transport of radioactive materials to UNRESTRICTED AREAS.

3/4.3.3.10 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The alarm/ trip setpoints for these instruments shall be calculated and adjusted in accordance with the procedures in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. This instrumentation also includes provisions for monitoring (and controlling) the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50.

3/4.11 RADIOACTIVE EFFLUENTS

BASES

3/4.11.1 LIQUID EFFLUENTS

3/4.11.1.1 CONCENTRATION

This specification is provided to ensure that the concentration of ràdioactive materials released in liquid waste effluents to UNRESTRICTED AREAS will be less than the concentration levels specified in 10 CFR Part 20, Appendix B, Table II, Column 2. This limitation provides additional assurance that the levels of radioactive materials in bodies of water in UNRESTRICTED AREAS will result in exposures within (1) the Section II.A design objectives of Appendix I, 10 CFR Part 50, to a MEMBER OF THE PUBLIC and (2) the limits of 10 CFR Part 20.106(e) to the population. The concentration limit for dissolved or entrained noble gases is based upon the assumption that Xe-135 is the controlling radioisotope and its MPC in air (submersion) was converted to an equivalent concentration in water using the methods described in International Commission on Radiological Protection (ICRP) Publication 2.

The required detection capabilities for radioactive materials in liquid waste samples are tabulated in terms of the lower limits of detection (LLDs). Detailed discussion of the LLD, and other detection limits can be found in HASL Procedures Manual, <u>HASL-300</u> (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry" <u>Anal. Chem. 40</u>, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

3/4.11.1.2 DOSE

This specification is provided to implement the requirements of Sections II.A, III.A and IV.A of Appendix I, 10 CFR Part 50. The Limiting Condition for Operation implements the guides set forth in Section II.A of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in liquid effluents will be kept "as low as is reasonably achievable." Also, for fresh water sites with drinking water supplies that can be potentially affected by plant operations, there is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in the finished drinking water that are in excess The dose calculations in the ODCM of the requirements of 40 CFR Part 141. implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The equations specified in the ODCM for calculating the doses due to the actual release rates of radioactive materials in liquid effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.113, "Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I," April 1977.

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This Specification applies to the release of liquid effluents from each reactor at the site. For units with shared radwaste treatment systems, the liquid effluents from the shared system are proportioned among the units sharing that system.

3/4.11.1.3 LIQUID RADWASTE TREATMENT

The requirement that the appropriate portions of this system be used, when specified, provides assurance that the releases of radioactive materials in liquid effluents will be kept "as low as is reasonably achievable". This Specification implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50 and the design objective given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the liquid radwaste treatment system were specified as a suitable fraction of the dose design objectives set forth in Section II.A of Appendix I, 10 CFR Part 50, for liquid effluents.

3/4.11.1.4 LIQUID HOLDUP TANKS

The tanks listed in this Specification include all those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

Restricting the quantity of radioactive material contained in the specified tanks provides assurance that in the event of an uncontrolled release of the tanks' contents, the resulting concentrations would be less than the limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA.

3/4.11.2 GASEOUS EFFLUENTS

3/4.11.2.1 DOSE RATE

This Specification is provided to ensure that the dose at any time at and beyond the SITE BOUNDARY from gaseous effluents from all units on the site will be within the annual dose limits of 10 CFR Part 20. The annual dose limits are the doses associated with the concentrations of 10 CFR Part 20, Appendix B, Table II, Column 1. These limits provide reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of a MEMBER OF THE PUBLIC, either within or outside the SITE BOUNDARY to annual average concentrations exceeding the limits specified in Appendix B, Table II of 10 CFR Part 20 (10 CFR Part 20.106(b)). For MEMBERS OF THE PUBLIC, who may at times be within the SITE BOUNDARY the occupancy of the individual will be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the SITE BOUNDARY. The specified

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release rate limits restrict, at all times, the corresponding gamma and beta dose rates above background to an individual at or beyond the SITE BOUNDARY to less than or equal to 500 mrems/year to the total body or to less than or equal to 3000 mrems/year to the skin. These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to a child via the inhalation pathway to less than or equal to 1500 mrems/year.

This Specification applies to the release of gaseous effluents from all reactors at the site. For units with shared radwaste treatment systems, the gaseous effluents from the shared system are proportioned among the units sharing that system.

The required detection capabilities for radioactive materials in gaseous waste samples are tabulated in terms of lower limits of detection (LLDs). Detailed discussion of the LLD, and other detection limits can be found in HASL Procedures Manual, <u>HASL-300</u> (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry" <u>Anal. Chem. 40</u>, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report <u>ARH-SA-215</u> (June 1975).

3/4.11.2.2 DOSE - NOBLE GASES

This Specification is provided to implement the requirements of Sections II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. The Limiting Condition for Operation implements the guides set forth in Section II.B of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents will be kept "as low as is reasonably achievable." The Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The dose calculations established in the ODCM for calculating the doses due to the actual release rates of radioactive noble gases in gaseous effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors," Revision 1, July 1977. The ODCM equations provided for determining the air doses at and beyond the SITE BOUNDARY are based upon the historical average atmospheric conditions.

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3/4.11.2.3 DOSE - IODINE-131, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

This Secification is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10 CFR Part 50. The Limiting Conditions for Operation are the guides set forth in Section II.C of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable." The ODCM calculational methods specified in the Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The ODCM calculational methods for calculating the doses due to the actual release rates of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors," Revision 1, July 1977. These equations also provide for determining the actual doses based upon the historical average atmospheric conditions. The release rate Specifications for iodine-131, radioiodines, tritium, and radionuclides in particulate form with half-lives greater than 8 days are dependent on the existing radionuclide pathways to man, in the areas at and beyond the SITE BOUNDARY. The pathways that were examined in the development inhalation of 1) individual airborne were: of these calculations radionuclides, 2) deposition of radionuclides onto green leafy vegetation with subsequent consumption by man, 3) deposition onto grassy areas where milk animals and meat producing animals graze with consumption of the milk and meat by man, and 4) deposition on the ground with subsequent exposure of man.

3/4.11.2.4 GASEOUS RADWASTE TREATMENT

The requirement that the appropriate portions of these systems be used, when specified, provides reasonable assurance that the releases of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable". This Specification implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50, and the design objectives given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the systems were specified as a suitable fraction of the dose design objectives set forth in Sections II.B and II.C of Appendix I, 10 CFR Part 50, for gaseous effluents.

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3/4.11.2.5 EXPLOSIVE GAS MIXTURE

This Specification is provided to ensure that the concentration of potentially explosive gas mixtures contained in the waste gas holdup system is maintained below the flammability limits of hydrogen and oxygen. Maintaining the concentration of hydrogen and oxygen below their flammability limits provides assurance that the releases of radioactive materials will be controlled in conformance with the requirements of General Design Criterion 60 of Appendix A to 10 CFR Part 50.

3/4.11.2.6 GAS STORAGE TANKS

The tanks included in this Specification are those tanks for which the quantity of radioactivity contained is not limited directly or indirectly by another Technical Specification to a quantity that is less than the quantity which provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting total body exposure to an individual at the nearest exclusion area boundary will not exceed 0.5 rem in an event of 2 hours.

Restricting the quantity of radioactivity contained in each gas storage tank provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting total body exposure to an individual at the nearest exclusion area boundary will not exceed 0.5 rem. This is consistent with Branch Technical Position ETSB 11-5 in NUREG-0800, July 1981.

3/4.11.3 SOLID RADIOACTIVE WASTE

This Specification implements the requirements of 10 CFR Part 50.36a and General Design Criterion 60 of Appendix A to 10 CFR Part 50. The process parameters included in establishing the PROCESS CONTROL PROGRAM may include, but are not limited to waste type, waste pH, waste/liquid/ SOLIDIFICATION agent/catalyst ratios, waste oil content, waste principal chemical constituents, mixing and curing times.

3/4.11.4 TOTAL DOSE

This Specification is provided to meet the dose limitations of 40 CFR Part 190 that have now been incorporated into 10 CFR Part 20 by 46 FR 18525. The Specification requires the preparation and submittal of a Special Report whenever the calculated doses from plant radioactive effluents exceed twice

RADIOACTIVE EFFLUENTS

BASES

the design objective doses of Appendix I. For sites containing up to 4 reactors. it is highly unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR Part 190 if the individual reactors remain within the reporting requirement level. The Special Report will describe a course of ACTION that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered. If the dose to any MEMBER OF THE PUBLIC is estimated to exceed the requirements of 40 CFR Part 190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40 CFR Part 190 have not already been corrected), in accordance with the provisions of 40 CFR Part 190.11 and 10 CFR Part 20.405c, is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 until NRC staff action is completed. The variance only relates to the limits of 40 CFR Part 190, and does not apply in any way to the other requirements for dose limitation of 10 CFR Part 20, as addressed in Specifications 3.11.1 and 3.11.2. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation that is part of the nuclear fuel cycle.

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Amendment No.

3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

BASES

3/4.12.1 MONITORING PROGRAM

The radiological environmental monitoring program required by this Specification provides measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of MEMBERS OF THE PUBLIC resulting from the station operation. This monitoring program implements Section IV.B.2 of Appendix I to 10 CFR Part 50 and thereby supplements the radiological effluent monitoring program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and the modeling of the environmental exposure pathways. The initially specified monitoring program will be effective for at least the first three years of commercial operation. Following this period, program changes may be initiated based on operational experience.

The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs). The LLDs required by Table 4.12-1 are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as an <u>a priori</u> (before the fact) limit representing the capability of a measurement system and not as an <u>a posteriori</u> (after the fact) limit for a particular measurement.

Detailed discussion of the LLD, and other detection limits, can be found in HASL Procedures Manual, <u>HASL-300</u> (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry" <u>Anal. Chem. 40</u>, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report <u>ARH-SA-215</u> (June 1975).

3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

BASES

3/4.12.2 LAND USE CENSUS

This Specification is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the radiological environmental monitoring program are made if required by the results of this census. The best information from the door-to-door survey, from aerial survey or from consulting with local agricultural authorities shall be used. This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50. Restricting the census to gardens of greater than 50 m² provides assurance that significant exposure pathways via leafy vegetables will be identified and monitored since a garden of this size is the minimum required to produce the quantity (26 kg/year) of leafy vegetables assumed in Regulatory Guide 1.109 for consumption by a child. To determine this minimum garden size, the following assumptions were made: 1) 20% of the garden was used for growing broad leaf vegetation (i.e., similar to lettuce and cabbage), and 2) a vegetation yield of 2 kg/m².

3/4.12/3 INTERLABORATORY COMPARISON PROGRAM

The requirement for participation in an approved Interlaboratory Comparison Program is provided to ensure that independent checks on the precision and accuracy of the measurements of radioactive material in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring in order to demonstrate that the results are reasonably valid for the purposes of Section IV.B.2 of Appendix I to 10 CFR Part 50.

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5.0 DESIGN FEATURES

5.1 SITE

EXCLUSION AREA

5.1.1 The exclusion area shall be as shown in Figure 5.1-1.

LOW POPULATION ZONE

5.1.2 The low population zone shall be as shown in Figure 5.1-1.

MAP DEFINING UNRESTRICTED AREAS FOR RADIOACTIVE GASEOUS AND LIQUID EFFLUENTS

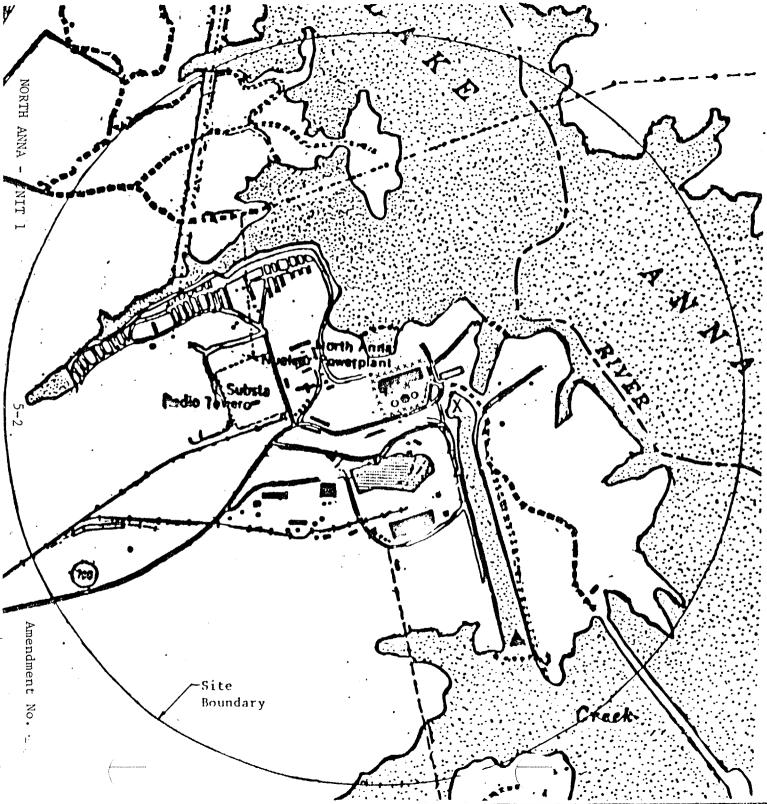
5.1.3 Information regarding radioactive gaseous and liquid effluents, which allows identification of structures and release points as well as definition of UNRESTRICTED AREAS within the SITE BOUNDARY that are accessible to MEMBERS OF THE PUBLIC, shall be as shown in Figure 5.1-1.

5.2 CONTAINMENT

CONFIGURATION

5.2.1 The reactor containment building is a steel lined, reinforced concrete building of cylindrical shape with a dome roof and having the following design features:

- a. Nominal inside diameter = 126 feet.
- b. Nominal inside height = 190 feet, 7 inches.
- c. Minimum thickness of concrete walls = 4.5 feet.
- d. Minimum thickness of concrete roof = 2.5 feet.
- e. Minimum thickness of concrete floor pad = 10 feet.
- f. Nominal thickness of the cylindrial portion of the steel liner = 3/8 inches.
- g. Net free volume = 1.825×10^6 cubic feet.
- h. Nominal thickness of hemispherical dome portion of the steel liner = 1/2 inch.



Gaseous Release

- 1. Process Vent- 157.5 ft.
- 2. Vent-Vent A&B and other release points considered ground level releases

X Liquid Release to the Discharge Canal

Liquid Release to the Unrestricted Area

•••Buoy Barriers

xxxx Security Fence- Area outsian is unrestricted for gaseous effluents

> Land Maximum Member of the Public Occupancy = 336 hrs/year

> Lake Maximum Member of the Public Occupancy = 2232 hrs/year

> > Figure 5.1-1

Map Defining Unrestricted Areas for Radioactive Gaseous and Liquid Effluents

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6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1 - 1971 for comparable positions and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for (1) the Supervisor - Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 The Station Manager is responsible for ensuring that retraining and replacement training programs for the facility staff are maintained and that such programs meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1 - 1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the SES.

6.5 REVIEW AND AUDIT

6.5.1 STATION NUCLEAR SAFETY AND OPERATING COMMITTEE (SNSOC)

FUNCTION

6.5.1.1 The SNSOC shall function to advise the Station Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The SNSOC shall be composed of the :

Chairman: Station Manager Vice Chairman: Assistant Station Manager Member: Superintendent-Operations Member: Superintendent-Maintenance Member: Superintendent-Technical Services Member: Supervisor-Health Physics

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SNSOC Chairman to serve on a temporary basis; however, no more than one alternate shall participate as a voting member in SNSOC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The SNSOC shall meet at least once per calendar month and as convened by the SNSOC Chairman or his designated alternate.

QUORUM

6.5.1.5 A quorum of the SNSOC consists of the Chairman or Vice-Chairman and two members including alternates.

RESPONSIBILITIES

6.5.1.6 The SNSOC shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8.1 and changes thereto, 2) all programs required by Specification 6.8.4 and changes thereto, 3) any other proposed procedures or changes thereto as determined by the Station Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Manager-Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control.
- f. Review of events requiring 24 hour written notification to the Commission.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Station Nuclear Safety and Operating Committee.
- i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Station Nuclear Safety and Operating Committee.
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Station Nuclear Safety and Operating Committee.

- k. Review of every unplanned onsite release of radioactive material to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President-Nuclear Operations and to the Director-Safety Evaluation and Control.
- 1. Review and approve changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

AUTHORITY

- 6.5.1.7 The SNSOC shall:
 - a. Recommend to the Station Manager written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
 - b. Render determinations in writing with regard to whether or not each item considered under 6.1.1.6(a) through (e) above constitutes an unreviewed safety question.
 - c. Provide written notification within 24 hours to Manager-Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control of disagreement between the SNSOC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the Manager-Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control.

6.5.2 SAFETY EVALUATION AND CONTROL (SEC)

FUNCTION

6.5.2.1 SEC shall function to provide independent review of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical and electrical engineering
- h. Administrative controls and quality assurance practices
- i. Other appropriate fields associated with the unique characteristics of the nuclear power plant

COMPOSITION

6.5.2.2 The SEC staff shall be composed of the Director-Safety Evaluation and Control and a minimum of three individuals who are qualified as staff specialists. Each SEC staff specialist shall have an academic degree in an engineering or physical science field and, in addition, shall have a minimum of five years technical experience in one or more areas given in Specification 6.5.2.1. These staff specialists shall not be directly involved in the licensing function.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the Director-Safety Evaluation and Control to provide expert advice to the SEC.

MEETING FREQUENCY

6.5.2.5 The SEC staff shall meet at least once per calendar month for the purpose of fostering interaction of reviews regarding safety-related operational activities.

REVIEW

- 6.5.2.7 The following subjects shall be reviewed by SEC:
 - a. Written safety evaluations of changes in the stations as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report and tests or experiments not described in the Safety Analysis Report which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests or experiments did not involve a change in the technical specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2) and is accomplished by review of minutes of the Station Nuclear Safety and Operating Committee and the design change program.
 - b. Proposed changes in procedures, proposed changes in the station, or proposed tests or experiments, any of which may involve a change in the technical specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). Matters of this kind shall be referred to the Director-Safety Evaluation and Control by the Station Nuclear Safety and Operating Committee following its review prior to implementation.
 - c. Changes in the technical specifications or license amendments relating to nuclear safety prior to implementation except in those cases where the change is identical to a previously reviewed proposed change.

- d. Violations and reportable occurrences such as:
 - Violations of applicable codes, regulations, orders, Technical Specifications, license requirements or internal procedures or instructions having safety significance;
 - 2. Significant operating abnormalities or deviations from normal or expected performance of station safety-related structures, systems, or components; and
 - 3. Reportable occurrences as defined in the station Technical Specification 6.9.1.8.

Review of events covered under this paragraph shall include the results of any investigations made and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

- e. The Quality Assurance Department audit program at least once per 12 months and audit reports.
- f. Any other matter involving safe operation of the nuclear power stations which is referred to the Director-Safety Evaluation and Control by the Station Nuclear Safety and Operating Committee.
- g. Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

AUTHORITY

6.5.2.9 The Director-Safety Evaluation and Control shall report to and advise the Manager-Nuclear Technical Services, who shall advise the Vice President-Nuclear Operations on those areas of responsibility specified in Section 6.5.2.7.

RECORDS

6.5.2.10 Records of SEC activities required by Section 6.5.2.7 shall be prepared and maintained in the SEC files and a summary shall be disseminated as indicated below each calendar month.

- 1. Vice President-Nuclear Operations
- 2. Nuclear Power Station Managers
- 3. Manager-Nuclear Operations and Maintenance
- 4. Manager-Nuclear Technical Services
- 5. Manager-Quality Assurance, Operations
- 6. Others that the Director-Safety Evaluation and Control may designate.

6.5.3 QUALITY ASSURANCE DEPARTMENT

FUNCTION

6.5.3.1 The Quality Assurance Department shall function to audit station activities. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Station Emergency Plan and implementing procedures at least once per 12 months.
- f. The Station Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the Executive Manager-Quality Assurance or the Senior Vice President-Power Operations.
- h. The Station Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.
- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- 1. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.

- m. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- n. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974, and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

AUTHORITY

6.5.3.2 The Quality Assurance Department shall report to and advise the Executive Manager-Quality Assurance, who shall advise the Senior Vice President-Power Operations on those areas of responsibility specified in Section 6.5.3.1.

RECORDS

6.5.3.3. Records of the Quality Assurance Department audits shall be prepared and maintained in the department files. Audit reports shall be disseminated as indicated below:

- 1. Nuclear Power Station Manager
- 2. Manager-Nuclear Operations and Maintenance
- 3. Manager-Nuclear Technical Services
- 4. Manager-Quality Assurance, Operations
- 5. Director-Quality Assurance, Nuclear Operations
- 6. Director-Safety Evaluation and Control
- 7. Supervisor of area audited
- 8. Nuclear Power Station Resident Quality Control Engineer

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
- b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the SNSOC and submitted to the Director-Safety Evaluation and Control and the Manager-Nuclear Operations and Maintenance.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Manager-Nuclear Operations and Maintenance, and the Director-Safety Evaluation and Control shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSOC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Director-Safety Evaluation and Control and the Manager-Nuclear Operations and Maintenance within 14 days of the violation.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.

- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program Implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.
- i. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the SNSOC and approved by the Station Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the SNSOC and approved by the Station Manager within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation spray, safety injection, chemical and volume control, gas stripper, and hydrogen recombiners. The program shall include the following:

- (i) Preventive maintenance and periodic visual inspection requirements and
- (ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

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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,
- (iv) Procedures for the recording and management of data,
- (v) Procedures defining corrective actions for all control point chemistry conditions,
- (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, and
- (vii) Monitoring of the condensate at the discharge of the condensate pumps for evidence of condenser inleakage. When condenser inleakage is confirmed, the leak shall be repaired, plugged, or isolated within 96 hours.

ADMINISTRATIVE CONTROLS (Continued)

at least 60 days prior to cycle initial criticality. In the event that the limits would be submitted at some other time during core life, they shall be submitted 60 days prior ro the date the limits would become effective unless otherwise approved by the Commission.

Any additional information needed to support the F^{RTP} and P submittal will be by request from the NRC and need not be included in this report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.11 Routine Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following initial criticality.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison (as appropriate) with preoperational studies, operational controls, and previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 3.12.2.

The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the Table and Figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 3.12.3; discussion of all deviations from the sampling schedule of Table 4.12-1 and discussion of all analyses in which the LLD required by Table 4.12-3 was not achievable.

*A single submittal may be made for a multiple unit station.

**One map shall cover stations near the SITE BOUNDARY; a second shall include the more distant stations.

ADMINISTRATIVE CONTROLS (Continued)

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT*

6.9.1.12 Routine Radioactive Effluent Release Reports covering the operation of the unit during the previous 6 months of operation shall be submitted with 60 days after January 1 and July 1 of each year. The period, of the firreport shall begin with the date of initial criticality.

The Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

The Radioactive Effluent Release Report shall be submitted within 60 days after January 1 of each year. This report shall include an assessment of the radiation doses to the maximum exposed MEMBERS OF THE PUBLIC due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year. Annual meteorological data collected over the previous year shall be in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability. This meteorological data shall be retained in a file on site and shall be made available to the NRC upon request. All assumptions used in making these assessments (i.e., specific activity, exposure time and location) shall be included in the OFFSITE DOSE CALCULATION MANUAL (ODCM). Concurrent meteorological conditions or historical annual average atmospheric dispersion conditions shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the OFFSITE DOSE CALCULATION MANUAL (OTCM).

If the dose to the maximum exposed MEMBER OF THE PUBLIC due to the radioactive liquid and gaseous effluents from the station during the previous calendar year exceeds twice the limits of Specification 3.11.1.2a, 3.11.1.2.b, 3.11.2.2.a, 3.11.2.2.b, 3.11.2.3.a, or 3.11.2.3.b the dose assessment shall include the contribution from direct radiation. The dose to the maximum exposed MEMBER OF THE PUBLIC shall show conformance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operation.

The Radioactive Effluent Release Reports shall include a list of unplanned releases as required to be reported in Technical Specification 6.9.1.9.e from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSITE DOSE CALCULATION MANUAL (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.12.2.

*A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

ADMINISTRATIVE CONTROLS (Continued)

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator, Region II, within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirement of the applicable reference specification:

- a. Inservice Inspection Program Reviews shall be reported within 90 days of completion. Specification 4.0.5.
- b. ECCS Actuation shall be reported within 90 days of the occurrence. The report shall describe the circumstances of the actuation and the total accumulated cycles to date. Specification 3.5.2 and 3.5.3.
- c. With Seismic Monitoring Instrumentation inoperable for more that 30 days, submit a special report within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrumentation to operable status. Specification 3.3.3.3.
- d. For all seismic events actuating a seismic monitoring instrument, submit a special report within 10 days describing the magnitude, frequency spectrum and resultant effects upon features important to safety. Specification 4.3.3.3.2.
- e. With Meteorological Instrumentation inoperable for more than 7 days, submit a special report within the next 10 days, outlining the cause of the malfunction and the plans for restoring the instrumentation to operable status. Specification 3.3.3.4.
- f. With the primary coolant specific activity > 1.0 μ Ci/gram DOSE EQUIVALENT 1-131 or > 100/E μ Ci/gram, a specific activity analysis shall be included in the REPORTABLE OCCCURRENCE report required pursuant to Specification 6.9.1.7. The information requested in Specification 3.4.8 shall also be included in that report.
- g. With sealed source or fission detector leakage tests revealing the presence of > 0.005 microcuries of removable contamination submit a special report on an annual basis outlining the corrective actions taken to prevent the spread of contamination. Specification 4.7.11.1.3.
- h. With the MTC more positive than 0 ∆k/k/°F submit a special report within the next 10 days describing the value of the measured MTC, the interim control rod withdrawal limits and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition. Specification 3.1.1.4.

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	i.	For any abnormal degradation of the structural integrity of the reactor vessel or the Reactor Coolant System pressure boundary detected during the performance of Specification 4.4.10, an initial report shall be submitted within 10 days after detection and a detailed report submitted within 90 days after the completion of Specification 4.4.10.
	j.	For any abnormal degradation of the containment structure detected during the performance of Specification 4.6.1.6, an initial report shall be submitted within 10 days after com- pletion of Specification 4.6.1.6. A final report, which includes (1) a description of the condition of the liner plate and concrete, (2) inspection procedure, (3) the tolerance on cracking and (4) the corrective actions taken, shall be sub- mitted within 90 days after the completion of Specification 4.6.1.6.
	k.	Inoperable Fire Detection Instrumentation, Specification 3.3.3.7.
	1.	Inoperable Fire Suppression Systems, Specifications 3.7.14.1, 3.7.14.2, 3.7.14.3, 3.7.14.4 and 3.7.14.5.
6.10	D REC	CORD RETENTION
6.10	р .1 Т	he following records shall be retained for at least five years:
	a.	Records and logs of facility operation covering time interval at each power level.
	b.	Records and logs of principal maintenance activities, in- spections, repair and replacement of principal items of equip- ment related to nuclear safety.
	c.	Each REPORTABLE OCCURRENCE submitted to the Commission.
	d.	Records of surveillance activities, inspections and cali- brations required by these Technical Specifications.
	e.	Records of changes made to Operating Procedures.
	f.	Records of radioactive shipments.
	g.	Records of sealed source leak tests and results.
	h.	Records of annual physical inventory of all sealed source material of record.
		The following records shall be retained for the duration of the Operating License:
NOR	TH AN	NA - UNIT 1 $6-2_2$ Amendment No. 3,

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient operational cycles for those facility components identified in Table 5.9-1.
- g. Records of reactor tests and experiments.
- h. Records of training and qualification for current members of the plant staff.
- i. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- 1. Records of meetings of the SNSOC.
- m. Records of meetings of the System Nuclear Safety and Operating Committee to issuance of Amendment No. 30.
- n. Records of the service lives of all hydraulic and mechanical snubbers listed on Tables 3.7-4a and 3.7-4b including the date at which the service life commences and associated installation and maintenance records.
- o. Records of secondary water sampling and water quality.
- p. Records of Environmental Qualification which are covered under the provisions of Paragraph 6.13.
- q. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This would include procedures effective at specified times and QA records showing that these procedures were followed.

NORTH ANNA - UNIT 1

Amendment No. 30, 33, 43.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit.* Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Health Physicist.

*Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

NORTH ANNA - UNIT 1

Amendment No. 76, 33, 31

6.13 ENVIRONMENTAL QUALIFICATION

6.13.1 By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment", December 1979. Copies of these documents are attached to Order for Modification of License NPF-4 dated October 24, 1980.

6.13.2 By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the ervironmental qualification method used for all safety-related electrical ecuipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be utdated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

6.14 PROCESS CONTROL PROGRAM (PCP)

- 6.14.1 Licensee initiated changes to the PCP:
 - 1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
 - b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the SNSOC.
 - 2. Shall become effective upon review and acceptance by the SNSOC.

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NHdeh Hated No. 13

6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)

- 6.15.1 The ODCM shall be approved by the Commission prior to implementation.
- 6.15.2 Licensee initiated changes to the ODCM:
 - 1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s);
 - b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the SNSOC.
 - 2. Shall become effective upon review and acceptance by the SNSOC.

6.16 MAJOR CHANGES TO RADIOACTIVE SOLID WASTE TREATMENT SYSTEMS*

- 6.16.1 Licensee initiated major changes to the radioactive solid waste systems:
 - 1. Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by SNSOC. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59.
 - b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;

*Licensees may chose to submit the information called for in this Specification as part of the annual FSAR update.

- d. An evaluation of the change, in quantity of solid waste that differs from those previously predicted in the license application and amendments thereto;
- e. An evaluation of the change, which shows the expected maximum exposures to individual in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto;
- f. A comparison of the predicted releases of radioactive materials, in solid waste, to the actual releases for the period prior to when the changes are to be made;
- g. An estimate of the exposure to plant operating personnel as a result of the change; and
- h. Documentation of the fact that the change was reviewed and found acceptable by SNSOC.
- 2. Shall become effective upon review and acceptance by SNSOC.

APPENDIX B

TO FACILITY OPERATING LICENSE NO. NPF-4 NORTH ANNA POWER STATION, UNIT NO. 1

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-338

ENVIRONMENTAL PROTECTION PLAN

DECEMBER 1980



ANCLEAR REGU

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-339

NORTH ANNA POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 31 License No. NPF-7

1. The Nuclear Regulatory Commission (the Commission) has found that:

- A. The application for amendment by Virginia Electric and Power Company (the licensee) dated December 17, 1982 as supplemented March 3, 1983, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
- B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
- C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
- D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
- E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-7 is hereby amended to read as follows:
 - (2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 31, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective on the date of issuance and must be fully implemented no later than January 1, 1984.

FOR THE NUCLEAR REGULATORY COMMISSION

haile M. Traimes Robert A. Clark, Chief

Operating Reactors Branch #3 Division of Licensing

Attachment: Changes to the Technical Specifications

Date of Issuance: May 5, 1983

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 31 TO FACILITY OPERATING LICENSE NO. NPF-7

DOCKET NO. 50-339

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages as indicated. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

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DELETE PART I - RADIOLOGICAL

in its entirety

REPLACE the cover sheet for PART II - NON-RADIOLOGICAL ENVIRONEMNTAL PROTECTION PLAN with the attached cover sheet.

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1.0 DEFINITIONS

CLARIFYING NOTE FOR MARGINAL LINES:

Definitions were repositioned in alphabetical order. Only those added or changed by this amendment are marginally lined.

Dispose of this informational page after incorporating changes in TS.

1.0 DEFINITIONS

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications.

ACTION

1.1 ACTION shall be that part of a Specification which prescribes remedial measures required under designated conditions.

AXIAL FLUX DIFFERENCE

1.2 AXIAL FLUX DIFFERENCE shall be the difference in normalized flux signals, expressed in % of RATED THERMAL POWER between the top and bottom halves of a two section excore neutron detector.

CHANNEL CALIBRATION

1.3 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRA-TION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire-channel is calibrated.

CHANNEL CHECK

1.4 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrumentation channels measuring the same parameter.

CHANNEL FUNCTIONAL TEST

- 1.5 A CHANNEL FUNCTIONAL TEST shall be:
 - a. Analog channels the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions.
 - b. Bistable channels the injection of a simulated signal into the sensor to verify OPERABILITY including alarm and/or trip functions.

CONTAINMENT INTEGRITY

- 1.6 CONTAINMENT INTEGRITY shall exist when:
 - 1.6.1 All penetrations required to be closed during accident conditions are either:

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- a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or
- b. Closed by manual values, blind flanges, or deactivated automatic values secured in their closed positions, except as provided in Table 3.6-1 of Specification 3.6.3.1,
- 1.6.2 All equipment hatches are closed and sealed,
- 1.6.3 Each air lock is OPERABLE pursuant to Specification 3.6.1.3,
- 1.6.4 The containment leakage rates are within the limits of Specification 3.6.1.2, and
- 1.6.5 The sealing mechanism associated with each penetration (e.g. welds, bellows or O-rings) is OPERABLE.

CONTROLLED LEAKAGE

1.7 CONTROLLED LEAKAGE shall be that seal water flow supplied to the reactor coolant pump seals.

CORE ALTERATION

1.8 CORE ALTERATION shall be the movement or manipulation of any component within the reactor pressure vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATION shall not preclude completion of movement of a component to a safe conservative position.

DOSE EQUIVALENT 1-131

1.9 The DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcurie/gram) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134 and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, "Calculation of Distance Factors for Power and Test Reactor Sites."

E - AVERAGE DISINTEGRATION ENERGY

1.10 \overline{E} shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives greater than 15 minutes, making up at least 95% of the total non-iodine activity in the coolant.

Amendment No. 31

ENGINEERED SAFETY FEATURE RESPONSE TIME

1.11 The ENGINEERED SAFETY FEATURE RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ESF actuation setpoint at the channel sensor until the ESF equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays where applicable.

FREQUENCY NOTATION

1.12 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.2.

GASEOUS RADWASTE TREATMENT SYSTEM

1.13 A GASEOUS RADWASTE TREATMENT SYSTEM is the system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system offgases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment. The system is composed of the waste gas decay tanks, regenerative heat exchanger, waste gas charcoal filters, process vent blowers, waste gas surge tanks and waste gas diaphram compressor.

IDENTIFIED LEAKAGE

1.14 IDENTIFIED LEAKAGE shall be:

- a. Leakage (except CONTROLLED LEAKAGE) into closed systems, such as pump seal or valve packing leaks that are captured and conducted to a sump or collecting tank, or
- b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE, or
- c. Reactor coolant system leakage through a steam generator to the secondary system.

MEMBER(S) OF THE PUBLIC

1.15 MEMBER(S) OF THE PUBLIC shall include all individuals who by virtue of their occupational status have no formal association with the plant. This category shall include non-employees of the licensee who are permitted to use portions of the site for recreational, occupational, or other purposes not associated with plant functions. This category shall <u>not</u> include non-employees such as vending machine servicemen or postmen who, as part of their formal job function, occasionally enter an area that is controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.16 The OFFSITE DOSE CALCULATION MANUAL shall contain the current methodology and parameters used in the calculation of offsite doses due to radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints and the specific monitoring locations of the environmental radiological monitoring program.

6

OPERABLE - OPERABILITY

1.17 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL MODE - MODE

1.18 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level, and average reactor coolant temperature specified in Table 1.1.

PHYSICS TESTS

1.19 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and 1) described in Chapter 14.0 of the FSAR, 2) authorized under the provisions of 10 CFR 50.59, or 3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

1.20 PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a non-isolable fault in a Reactor Coolant System component body, pipe wall or vessel wall.

PROCESS CONTROL PROGRAM (PCP)

1.21 The PROCESS CONTROL PROGRAM shall contain the current formula, sampling, analyses, tests and determinations to be made to ensure that the processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Part 20, 10 CFR Part 71 and Federal and State regulations and other requirements governing the disposal of the radioactive waste.

PURGE - PURGING

1.22 PURGE or PURGING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

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QUADRANT POWER TILT RATIO

1.23 QUADRANT POWER TILT RATIO shall be the ratio of the maximum upper excore detector calibrated output to the average of the upper excore detector calibrated outputs, or the ratio of the maximum lower excore detector calibrated output to the average of the lower excore detector calibrated outputs, whichever is greater. With one excore detector inoperable, the remaining three detectors shall be used for computing the average.

RATED THERMAL POWER

1.24 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 2775 MWt.

REACTOR TRIP SYSTEM RESPONSE TIME

1.25 The REACTOR TRIP SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its trip setpoint at the channel sensor until loss of stationary gripper coil voltage.

REPORTABLE OCCURRENCE

1.26 A REPORTABLE OCCURRENCE shall be any of those conditions specified in Specification 6.9.1.8 and 6.9.1.9.

SHUTDOWN MARGIN

1.27 SHUTDOWN MARGIN shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming all full length rod cluster assemblies (shutdown and control) are fully inserted except for the single rod cluster assembly of highest reactivity worth which is assumed to be fully withdrawn.

SITE BOUNDARY

1.28 The SITE BOUNDARY shall be that line beyond which the land is not owned, leased or otherwise controlled by the licensee.

SOLIDIFICATION

1.29 SOLIDIFICATION shall be the conversion of wet wastes into a solid form that meets shipping and burial ground requirements.

SOURCE CHECK

1.30 A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to radiation. This applies to installed radiation monitoring systems.

STAGGERED TEST BASIS

1.31 A STAGGERED TEST BASIS shall consist of:

- a. A test schedule for n systems, subsystems, trains or other designated components obtained by dividing the specified test interval into n equal subintervals,
- b. The testing of one system, subsystem, train or other designated component at the beginning of each subinterval.

THERMAL POWER

1.32 THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

UNIDENTIFIED LEAKAGE

1.33 UNIDENTIFIED LEAKAGE shall be all leakage which is not IDENTIFIED LEAKAGE or CONTROLLED LEAKAGE.

UNRESTRICTED AREA

1.34 An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY where access is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

VENTILATION EXHAUST TREATMENT SYSTEM

1.35 A VENTILATION EXHAUST TREATMENT SYSTEM is the system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment (such a system is not considered to have any effect on noble gas effluents). Engineered Safety Feature (ESF) atmospheric cleanup systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

VENTING

1.36 VENTING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is not provided or required during VENTING. Vent, used in system names, does not imply a VENTING process.

TABLE 1.1

OPERATIONAL MODES

MODE		REACTIVITY CONDITION, K	% RATED THERMAL POWER*	AVERAGE COOLANT TEMPERATURE
1.	POWER OPERATION	<u>></u> 0.99	> 5%	<u>></u> 350°F
2.	STARTUP	<u>></u> 0.99	<u><</u> 5%	<u>></u> 350°F
3.	HOT STANDBY	< 0.99	0	<u>></u> 350°F
4.	HOT SHUTDOWN	< 0.99	0	350°F > T > 200°F ^{avg}
5.	COLD SHUTDOWN	< 0.99	0	<u><</u> 200°F
6.	REFUELING**	<u><</u> 0.95	0	<u><</u> 140°F

*Excluding decay heat. **Fuel in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.

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TABLE 1.2

FREQUENCY NOTATION

NOTATION	FREQUENCY
S	At least once per 12 hours.
מ	At least once per 24 hours.
W	At least once per 7 days.
M	At least once per 31 days.
Q	At least once per 92 days.
SA	At least once per 184 days.
R	At least once per 18 months.
S/U	Prior to each reactor startup.
P	Completed prior to each release.
N.A.	Not applicable.

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INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.9 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The alarm/ trip setpoints of these channels shall be determined and adjusted in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times.

ACTION:

- a. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above Specification, without delay suspend the release of radioactive liquid effluents monitored by the affected channel or declare the channel inoperable, or change the setpoint so it is acceptably conservative.
- b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, for reasons other than a above, take the ACTION shown in Table 3.3-12. Exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Seminannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.
- c. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.9 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-12.

TABLE 3.3-12

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	ACTION
1.	GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE	· "	• •
۰.	a. Liquid Radwaste Effluent Line	1.	26
2.	GROSS BETA OR GAMMA RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE		
	a. Service Water System Effluent Line	1	26
	b. Circulating Water System Effluent Line	1	29
3.	CONTINUOUS COMPOSITE SAMPLERS AND SAMPLER FLOW MONITOR	1	26
	a. Clarifier Effluent Line		
4.	FLOW RATE MEASUREMENT DEVICES		07
	a. Liquid Radwaste Effluent Line	1	27

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TABLE 3.3-12 (Continued)

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

		INSTRUMENT		MINIMUM CHANNELS OPERABLE	ACTION
5.	TANK	LEVEL INDICATING DEVICES*			
•	а.	Refueling Water Storage Tanks		1	28
·	•	Casing Cooling Storage Tanks		1	28
	b.		· ·	l	28
	C.	PG Water Storage Tanks**		. 1	28
	d.	Boron Recovery Test Tanks**		*	

*Tanks included in this Specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and do not have tank overflows and surrounding area

drains connected to the liquid radwaste treatment system.

**This is a shared system with Unit 1.

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TABLE 3.3-12 (Continued)

TABLE NOTATION

- ACTION 26 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, effluent releases via this pathway may continue provided that, at least once per 12 hours, grab samples are collected and analyzed for gross radioactivity (beta or gamma) at a lower limit of detection of at least 10⁻⁷ microcurie/gram or an isotopic_7radioactivity at a lower limit of detection of at least 5x10⁻⁷ microcuries/gram.
- ACTION 27 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours during actual releases. Design capacity performance curves generated in situ may be used to estimate flow.
- ACTION 28 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, liquid additions to this tank may continue provided the tank liquid level is estimated during all liquid additions to the tank.
- ACTION 29 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, make repairs as soon as possible. Grab samples cannot be obtained via this pathway.

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TABL	Εl	1.3	-12	

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

Inst	RUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
1.	GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE a. Liquid Radwaste Effluent Line	D	D	R	Q(1)
2.	GROSS BETA OR GAMMMA RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE			•	0(0)
•	a. Service Water System Effluent Line	D	M	R	Q(2)
•	b. Circulating Water System Effluent Line	D	М	R	Q(2)
3.	CONTINUOUS COMPOSITE SAMPLERS AND SAMPLER FLOW MONITOR				N 4
4 1	a. Clarifier Effluent Line	N.A.	N.A.	R	N.A.

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TABLE 4.3-12 (Continued)

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INST	RUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
4.	FLOW RATE MEASUREMENT DEVICES	-			
	a. Liquid Radwaste Effluent Line	D(3)	N.A.	R	, Q ´
.`	·.				
5.	TANK LEVEL INDICATING DEVICES***				
	a. Refueling Water Storage Tank	D*	N.A.	R	Q
	b. Casing Cooling Storage Tank	D*	N.A.	R	Q
	c. PG Water Storage Tanks**	D*	N.A.	R	Q
•	d. Boron Recovery Storage Tanks**	D*	N.A.	R	Q

*During liquid additions to the tank.

**This is a shared system with Unit l.
***Tanks included in this Specification are those outdoor tanks that are not surrounded by liners,
dikes, or walls capable of holding the tank contents and do not have tank overflows and
surrounding area drains connected to the liquid radwaste treatment system.

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TABLE NOTATION

- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
 - 1. Instrument indicates measured levels above the alarm/trip setpoint.
 - · 2. Instrument controls not set in operate mode.
- (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

1. Instrument indicates measured levels above the alarm/trip setpoint.

- 2. Instrument controls not set in operate mode.
- (3) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

INSTRUMENTATION

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.10 The radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.3-13 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.10.2.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the ODCM.

APPLICABILITY: As shown in Table 3.3-13

ACTION:

- a. With a radioactive gaseous effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above Specification, without delay suspend the release of radioactive gaseous effluents monitored by the affected channel or declare the channel inoperable, or change the setpoint so it is acceptably conservative.
- b. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, for reasons other than a above, take the ACTION shown in Table 3.3-13. Exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.
- c. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.10 Each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-13.

TABLE 3.3-13

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
1.	PROCESS VENT SYSTEM			
	a. Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release	1	*	31,33
•		1	*	31,34
	b. Iodine Samplerc. Particulate Sampler	1	*	31,34
•	d. Process Vent Flow Rate Measuring Device	1	*	30
•	e. Sampler Flow Rate Measuring Devic	e 1	*	30
2.	WASTE GAS HOLDUP SYSTEM EXPLOSIVE GAS MONITORING SYSTEM (Shared with Unit 1)			
	a. Hydrogen Monitor	· 1	**	32
	b. Oxygen Monitor	1 .	**	. 32
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TABLE 3.3-13 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
3.	CONDENSER AIR EJECTOR SYSTEM			
	a. Gross Activity Monitor	i	*	31
	b. Flow Rate Monitor	1	*	30
4.	VENTILATION VENT SYSTEM (Shared with a. Noble Gas Activity Monitor b. Iodine Sampler	Unit 1) 1* 1*	*	31 31
	c. Particulate Sampler	1*	*	31
	d. Flow Rate Monitor	1*	*	30
	e. Sampler Flow Rate Monitor	1*	*	.30

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*One per vent stack.

TABLE 3.3-13 (Continued)

TABLE NOTATION .

* At all times.

- ** During process vent system operation (treatment for primary system offgases).
- ACTION 30 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours.
- ACTION 31 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, effluent releases via this pathway may continue provided grab samples are taken at least once per 12 hours and these samples are analyzed for gross activity or gamma isotopic activity within 24 hours.
- ACTION 32 With the number of channnels OPERABLE less than required by the minimum channels OPERABLE requirement, operation of this system may continue for up to 14 days provided grab samples are taken and analyzed daily. With this channel inoperable, operation may continue provided grab samples are taken and analyzed: (1) every 4 hours during degassing operations and (2) daily during other operations.
- ACTION 33 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the Waste Gas Decay Tanks may be released to the environment provided that prior to initiating the release:
 - a. At least two independent samples of the tank's contents are analyzed, and
 - At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge valve lineup;

Otherwise, suspend release of Waste Gas Decay Tank effluents.

ACTION 34 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases from the Waste Gas Decay Tanks may continue provided samples are continuously collected with auxiliary sampling equipment as required in Table 4.11-2.

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TABLE 4.3-13

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>1NS</u>	<u>CRUMENT</u>	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
1.	PROCESS VENT SYSTEM					
	a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release	D	Р	R	Q(1)	*
	b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
	c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
	d. Process Vent Flow Rate Neasuring Device	D	N.A.	R	Q	*
•	e. Sampler Flow Rate Monitor	D(5)	N.A.	R	N.A.	*
2.	WASTE GAS HOLDUP SYSTEM EXPLOSIVE GAS MONITORING SYSTEM					
	a. Hydrogen Monitor	D	N.A.	Q(3)	М	**
1	b. Oxygen Monitor	D	N.A.	Q(4)	М	· ** 、

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RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INS	TRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
3.	CONDENSER AIR EJECTOR SYSTEM			· .		
	a. Noble Gas Activity Monitor	D	М	R	Q(2)	*
	b. Flow Rate Monitor	D	N.A.	R	Q	*
4.	VENTILATION VENT SYSTEM (Shared v	vith Unit 1)				
, ,	a. Noble Gas Activity Monitor	. D	M	R	Q(2)	*
	b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
· .	c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
1 1	d. Flow Rate Monitor	D	N.A.	R	Q	*
	e. Sampler Flow Rate Monitor	D(5)	N.A.	R	N.A.	*

TABLE NOTATION

- * At all times other than when the line is valved out and/or locked.
- ** During process vent system operation (treatment for primary system offgases).
- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occurs if any of the following conditions exists:
 - 1. Instrument indicates measured levels above the alarm/trip setpoint.
 - 2. Instrument controls not set in operate mode.
- (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
 - 1. Instrument indicates measured levels above the alarm setpoint.
 - 2. Instrument controls not set in operate mode.
- (3) The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:
 - 1. One volume percent hydrogen, balance nitrogen, and
 - 2. Four volume percent hydrogen, balance nitrogen.
- (4) The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:
 - 1. One volume percent oxygen, balance nitrogen, and
 - 2. Four volume percent oxygen, balance nitrogen.
- (5) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic or batch releases are made.

3/4.11 RADIOACTIVE EFFLUENTS

3/4.11.1 LIQUID EFFLUENTS

CONCENTRATION

LIMITING CONDITION FOR OPERATION

3.11.1.1 The concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (see Figure 5.1-3) shall be limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2×10^{-4} microcuries/ml.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS exceeding the above limits, without delay restore the concentration to within the above limits.
- b. The provisions of Specification 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.1.1 Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11-1.

4.11.1.1.2 The results of the radioactivity analyses shall be used in accordance with the methods in the ODCM to assure that the concentrations at the point of release are maintained within the limits of Specification 3.11.1.1.

TABLE 4.11-1

Liquid Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) ^a (mCi/ml)
A. Batch Releases ^b ,g	P Each Batch	P Each Batch	Principal Gamma Emitters	5x10 ⁻⁷
			I-131	1x10 ⁻⁶
	P One Batch/M	М	Dissolved and Entrained Gases (Gamma Emitters)	1x10 ⁻⁵
	P	Md	Н-3	1x10 ⁻⁵
	Each Batch	Composite ^d	Gross Alpha	1x10 ⁻⁷
	P Q Each Batch Composite ^d	Sr-89, Sr-90	5x10 ⁻⁸	
		*	Fe-55	1x10 ⁻⁶
B. Continuous Releases	Continuous ^f	W Composite ^f	Principal Gamma Emitters	5x10 ⁻⁷
			1-131	1×10 ⁻⁶
			Dissolved and Entrained Gases (Gamma Emitters)	1×10 ⁻⁵
~	f	Mf	H-3	1x10 ⁻⁵
	Continuous ^f	Composite	Gross Alpha	1x10 ⁻⁷
	f	Q f	Sr-89, Sr-90	5x10 ⁻⁸
	Continuous ^f	Composite		1x10 ⁻⁶

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

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Amendment No. 31

TABLE NOTATION

^aThe (LLD) is defined, for purposes of these Specifications, as the smallest concentration of radioactive material in a sample that will yield a net count (above system background) that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system (which may include radiochemical separation):

		4.66 s _b
LLD	=	E. V. 2.22 x 10^6 · Y · exp (- $\lambda \Delta t$)

Where:

LLD is the "a priori" lower limit of detection as defined above (as microcuries per unit mass or volume),

s, is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (as counts per minute),

E is the counting efficiency (as counts per disintegration),

V is the sample size (in units of mass or volume),

 2.22×10^6 is the number of disintegrations per minute per microcurie,

Y is the fractional radiochemical yield (when applicable),

 λ is the radioactive decay constant for the particular radionuclide, and,

 Δt for plant effluents is the elapsed time between the midpoint of sample collection and time of counting.

Typical values of E, V, Y, and Δt should be used in the calculation.

TABLE NOTATION

It should be recognized that the LLD is defined as an <u>a priori</u> (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

^bA batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses, each batch shall be isolated, and then thoroughly mix as the situation permits, to assure representative sampling.

^CThe principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141, and Ce-144. This list does not mean that only these nuclides are to be detected and reported. Other peaks that are measurable and identifiable at levels exceeding the LLD, together with the above nuclides, shall also be identified and reported.

^dA composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged and in which the method of sampling employed results in a specimen that is representative of the liquids released.

^eA continuous release is the discharge of liquid wastes of a nondiscrete volume, e.g., from a volume of a system that has an input flow during the continuous release.

^fTo be representative of the quantities and concentrations of radioactive materials in liquid effluents, samples shall be collected continuously in proportion to the rate of flow of the effluent stream. Prior to analyses, all samples taken for the composite shall be thoroughly mixed in order for the composite sample to be representative of the effluent release.

^gWhenever the secondary coolant activity exceeds 10⁻⁵ uCi/ml the turbine building sump pumps shall be placed in manual operation and samples shall be taken and analyzed prior to release. Secondary coolant activity samples shall be collected and analyzed on a weekly basis. These samples are analyzed for gross activity or gamma isotopic activity within 24 hours.

DOSE

LIMITING CONDITION FOR OPERATION

3.11.1.2 The dose or dose commitment to the maximum exposed MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each reactor unit, to UNRESTRICTED AREAS (see Figure 5.1-1) shall be limited:

- a. During any calendar quarter to less than or equal to 1.5 mrems to the total body and to less than or equal to 5 mrems to the critical organ,* and
- b. During any calendar year to less than or equal to 3 mrems to the total body and to less than or equal to 10 mrems to the critical organ.*

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.2 <u>Dose Calculations</u>. Cumulative dose contributions from liquid effluents shall be determined in accordance with the ODCM at least once per 31 days.

*The maximum exposed MEMBER OF THE PUBLIC and the critical organ is addressed in the ODCM.

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-- Amendment No. 31

LIQUID RADWASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.1.3 The liquid radwaste ion exchanger system shall be used to reduce the radioactive materials in liquid wastes prior to their discharge when the projected doses due to the liquid effluent, from each reactor unit, to UNRESTRICTED AREAS (see Figure 5.1-1) would exceed 0.06 mrem to the total body or 0.2 mrem to the critical organ* in a 31 day period.

APPLICABILITY: At all times.

ACTION:

- a. With radioactive liquid waste being discharged without treatment and in excess of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report that includes the following information:
 - Explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,
 - 2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and
 - 3. Summary description of ACTION(s) taken to prevent a recurrence.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.3.1 Doses due to liquid releases shall be projected at least once per 31 days in accordance with the ODCM.

*The critical organ is addressed in the ODCM.

NORTH ANNA - UNIT 2

Amendment No. 31

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATION

3.11.1.4 The quantity of radioactive material contained in each of the following unprotected outdoor tanks shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases.

- a. Refueling Water Storage Tank
- b. Casing Cooling Storage Tank
- c. PG Water Storage Tank*
- d. Boron Recovery Test Tank*
- e. Any Outside Temporary Tank**

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.4 The quantity of radioactive material contained in each of the above listed tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per week when radioactive materials are being added to the tank.

*This is a shared system with Unit 1.

**Tanks included in this Specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste ion exchanger system.

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Amendment No. 31

3/4.11.2 GASEOUS EFFLUENTS

DOSE RATE

LIMITING CONDITION FOR OPERATION

3.11.2.1 The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1-1) shall be limited to the following:

- a. For noble gases: Less than or equal to 500 mrems/yr to the total body and less than or equal to 3000 mrems/yr to the skin, and
- b. For iodine-131, for tritium, and for all radionuclides in particulate form with half lives greater than 8 days: Less than or equal to 1500 mrems/yr to the critical organ.*

APPLICABILITY: At all times.

ACTION:

- a. With the dose rate(s) exceeding the above limits, without delay restore the release rate to within the above limit(s).
- b. The provisions of Specification 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.1.1 The dose rate due to noble gases in gaseous effluents shall be determined continuously to be within the above limits in accordance with the methods and procedures of the ODCM.

4.11.2.1.2 The dose rate due to iodine-131, tritium, and all radionuclides in particulate form with half lives greater than 8 days, in gaseous effluents shall be determined to be within the above limits in accordance with the methods and procedures of the ODCM by obtaining representative samples and performing analyses in accordance with the sampling and analysis program specified in Table 4.11-2.

*The critical organ is defined in the ODCM.

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TABLE 4.11-2

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

		Sampling	Ninimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) ² (uCi/ml)
	eous Release Type Waste Gas Storage Tank	Frequency P Each Tank Grab Sample	P Each Tank	Principal Gamma Emitters	
3.	Containment PURGE	P Each FURGE	P Each PURGE	Principal Gamma Emitters	b 1×10^{-4}
-		Grab Sample		11-3	1x10 ⁻⁶
	Process Vent Vent. Vent A	M ^C Grab	MC	Principal Gamma Emitters	1×10^{-4}
	Vent. Vent B	Sample		н-3	1×10 ⁻⁶
D.	All Release Types as listed in A, B,	Continuous ^d	W ^e Charcoal Sample	1-131	1x10 ⁻¹²
	C above.	Continuous	W ^e Particulate Sample	Principal Gamma Emitter	
•		Continuous	M Composite Particulate Sample	Gross Alpha	1x10 ⁻¹¹
		d Continuous	() Composite Particulate Sample	Sr-89, Sr-90	1×10 ⁻¹¹
		d Continuous	Noble Gas Monitor	Noble Gases Gross Beta or Camma	1×10^{-6}

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RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

Gaseous Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) ^a (uCi/ml)
E. Condenser Air Ejector	W	W	Principle Gamma Emitters ^g	1x10 ⁻⁴
' Vent' Steam Generator Blowdown Vent	Grab Sample		H3	1×10^{-6}

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TABLE NOTATION

^aThe LLD is defined, for purposes of these Specifications, as the smallest concentration of radioactive material in a sample that will yield a net count (above system background) that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system (which may include radiochemical separation):

	4.66 s _b
LLD	 $E \cdot V \cdot 2.22 \times 10^6 \cdot Y \cdot \exp(-\lambda \Delta t)$

Where:

LLD is the "a priori" lower limit of detection as defined above (as microcuries per unit mass or volume),

s, is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (as counts per minute),

E is the counting efficiency (as counts per disintegration),

V is the sample size (in units of mass or volume),

2.22 x 10° is the number of disintegrations per minute per microcurie,

Y is the fractional radiochemical yield (when applicable),

 $\boldsymbol{\lambda}$ is the radioactive decay constant for the particular radionuclide, and,

Lt for plant effluents is the elapsed time between the midpoint of sample collection and time of counting.

Typical values of E, V, Y, and Δt should be used in the calculation.

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TABLE NOTATION

It should be recognized that the LLD is defined as an <u>a priori</u> (before the fact) limit representing the capability of a measurement system and not as an <u>a posteriori</u> (after the fact) limit for a particular measurement.

^bThe principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, Xe-135m, and Xe-138 for gaseous emissions and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141 and Ce-144 for particulate emissions. This list does not mean that only these nuclides are to be detected and reported. Other peaks that are measurable and identifiable, at levels exceeding the LLD together with the above nuclides, shall also be identified and reported.

^CSampling and analysis shall also be performed following shutdown, startup, and whenever a THERMAL POWER change exceeding 15 percent of the RATED THERMAL POWER occurs within a one hour period, if (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant is greater than 1.0 uCi/gm; and (2) the noble gas activity monitor shows that effluent activity has increased by more than a factor of 3.

^dThe ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Specifications 3.11.2.1, 3.11.2.2 and 3.11.2.3.

Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing (or after removal from sampler). Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup or THERMAL POWER change exceeding 15 percent of RATED THERMAL POWER in one hour and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement applies if (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant is greater than 1.0 uCi/gm and; (2) the noble gas monitor shows that effluent activity has increased more than a factor of 3.

^tWhenever the secondary coolant activity exceeds 10⁻⁵ uCi/ml, samples shall be obtained and analyzed weekly. The turbine building sump pumps shall be placed in manual operation and samples shall be taken and analyzed prior to release. Secondary coolant activity samples shall be collected and analyzed on a weekly basis. These samples are analyzed for gross activity or gamma isotopic activity within 24 hours.

^gThe principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, Xe-135m, and Xe-138 for gaseous emissions. This list does not mean that only these nuclides are to be detected and reported. Other peaks that are measurable and identifiable, at levels exceeding the LLD together with the above nuclides, shall also be identified and reported.

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DOSE - NOBLE GASES

LIMITING CONDITION FOR OPERATION

3.11.2.2 The air dose due to noble gases released in gaseous effluents, from each reactor unit, from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1-1) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 5 mrads for gamma radiation and less than or equal to 10 mrads for beta radiation and,
 - b. During any calendar year: Less than or equal to 10 mrads for gamma radiation and less than or equal to 20 mrads for beta radiation.

APPLICABILITY: At all times.

ACTION

- a. With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.2 <u>Dose Calculations</u> Cumulative dose contributions for noble gases for the current calendar quarter and current calendar year shall be determined in accordance with the ODCM at least once per 31 days.

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DOSE - IODINE-131, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

LIMITING CONDITION FOR OPERATION

3.11.2.3 The dose to the maximum exposed MEMBER OF THE PUBLIC from iodine-131, from tritium, and from all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released, from each reactor unit, from the site to UNRESTRICTED AREAS (see Figure 5.1-1) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 7.5 mrems to the critical organ* and,
- b. During any calendar year: Less than or equal to 15 mrems to the critical organ*.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of iodine-131, tritium, and radionuclides in particulate form with half lives greater than 8 days, in gaseous effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.3 <u>Dose Calculations</u> Cumulative dose contributions for the current calendar quarter and current calendar year for iodine-131, tritium and radionuclides in particulate form with half lives greater than 8 days shall be determined in accordance with the ODCM at least once per 31 days.

*The critical organ is addressed in the ODCM.

GASEOUS RADWASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.2.4 The GASEOUS RADWASTE TREATMENT SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected gaseous effluent air doses due to gaseous effluent releases, from each reactor unit, from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1-1) would exceed 0.2 mrad for gamma radiation and 0.4 mrad for beta radiation over 31 days. The VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases, from each reactor unit, from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1-1) would exceed 0.3 mrem to the critical organ* over 31 days.

APPLICABILITY: At all times.

ACTION:

- a. With gaseous waste being discharged without treatment and in excess of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that includes the following information:
 - Explanation of why gaseous radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,
 - 2. ACTION(s) taken to restore the inoperable equipment to OPERABLE status, and
 - 3. Summary description of ACTION(s) taken to prevent a recurrence.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.4.1 Doses due to gaseous releases from the site shall be projected at least once per 31 days in accordance with the ODCM.

*The critical organ is addressed in the ODCM.

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EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

3.11.2.5 The concentration of oxygen in the waste gas decay tanks shall be limited to less than or equal to 2% by volume whenever the hydrogen concentration exceeds 4% by volume and is less than 96% by volume.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of oxygen in the waste gas decay tanks greater than 2% by volume but less than or equal to 4% by volume, reduce the oxygen concentration to the above limits within 48 hours.
- b. With the concentration of oxygen in the waste gas decay tanks greater than 4% by volume and the hydrogen concentration greater than 2% by volume, immediately suspend all additions of waste gases to the system and reduce the concentration of oxygen to less than or equal to 2% by volume without delay.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.5 The concentrations of hydrogen and oxygen in the waste gas decay tanks shall be determined to be within the above limits by continuously monitoring the waste gases in the waste gas decay tanks with the hydrogen and oxygen monitors required OPERABLE by Table 3.3-13 of Specification 3.3.3.11.

GAS STORAGE TANKS

LIMITING CONDITION FOR OPERATION

3.11.2.6 The quantity of radioactivity contained in each gas storage tank shall be limited to less than or equal to \leq 25,000 curies noble gases (considered as Xe-133).

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any gas storage tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.6 The quantity of radioactive material contained in each gas storage tank shall be determined to be within the above limit at least once per month when the specific activity of the primary reactor coolant is ≤ 1.0 uCi/gm DOSE EQUIVALENT I-131. Under conditions which result in a specific activity > 1.0 uCi/gm DOSE EQUIVALENT I-131, the Gas Storage Tank(s) shall be sampled once per 24 hours, when radioactive materials are being added to the tank.

3/4.11.3 SOLID RADIOACTIVE WASTE

LIMITING CONDITION FOR OPERATION

3.11.3 SOLIDIFICATION shall be conducted in accordance with a PROCESS CONTROL PROGRAM.

APPLICABILITY: At all times.

ACTION:

- a. With the provisions of the PROCESS CONTROL PROGRAM not satisfied, suspend shipments of defectively processed or defectively packaged solid radioactive wastes from the site.
- b. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.3.1 The PROCESS CONTROL PROGRAM shall be used to verify the SOLIDIFICATION of at least one representative test specimen from at least every tenth batch of each type of wet radioactive waste (e.g., filter sludges, spent resins, evaporator bottoms, boric acid solutions, and sodium sulfate solutions).

- a. If any test specimen fails to verify SOLIDIFICATION, the SOLIDIFICATION of the batch under test shall be suspended until such time as additional test specimens can be obtained, alternate SOLIDIFICATION parameters can be determined in accordance with the PROCESS CONTROL PROGRAM, and a subsequent test verifies SOLIDIFICA-TION. SOLIDIFICATION of the batch may then be resumed using the alternative SOLIDIFICATION parameters determined by the PROCESS CONTROL PROGRAM.
- b. If the initial test specimen from a batch of waste fails to verify SOLIDIFICATION, the PROCESS CONTROL PROGRAM shall provide for the collection and testing of representative test specimens from each consecutive batch of the same type of wet waste until at least 3 consecutive initial test specimens demonstrate SOLIDIFICATION. The PROCESS CONTROL PROGRAM shall be modified as required, as provided in Specification 6.13, to assure SOLIDIFICATION of subsequent batches of waste.

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3/4.11.4 TOTAL DOSE

LIMITING CONDITION FOR OPERATION

3.11.4 The annual (calendar year) dose or dose commitment to the maximum exposed MEMBER OF THE PUBLIC due to releases of radioactivity and radiation, from uranium fuel cycle sources shall be limited to less than or equal to 25 mrems to the total body or the critical organ* (except the thyroid, which shall be limited to less than or equal to 75 mrems).

APPLICABILITY: At all times.

ACTION:

With the calculated doses from the release of radioactive materials а. in liquid or gaseous effluents exceeding twice the limits of Specification 3.11.1.2.a, 3.11.1.2.b, 3.11.2.2.a, 3.11.2.2.b, 3.11.2.3.a, or 3.11.2.3.b, calculations should be made to determine whether the above limits of Specification 3.11.4 have been exceeded. If such is the case, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits. This Special Report, as defined in 10 CFR Part 20.405c, shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits, and if the release condition resulting in violation of 40 CFR Part 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.4 <u>Dose Calculations</u> Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Specifications 4.11.1.2, 4.11.2.2, and 4.11.2.3, and in accordance with the ODCM.

*The critical organ is addressed in the ODCM.

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3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.1 MONITORING PROGRAM

LIMITING CONDITION FOR OPERATION

3.12.1 The radiological environmental monitoring program shall be conducted as specified in Table 4.12-1.

APPLICABILITY: At all times.

ACTION:

- a. With the radiological environmental monitoring program not being conducted as specified in Table 4.12-1, in lieu of a Licensee Event Report, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Specification 6.9.1.11, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.
- b. With the level of radioactivity as the result of plant effluents in an environmental sampling medium at a specified location exceeding the reporting levels of Table 4.12-2 when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose to A MEMBER OF THE PUBLIC is less than the calendar year limits of Specifications 3.11.1.2, 3.11.2.2, and 3.11.2.3. When more than one of the radionuclides in Table 4.12-2 are detected in the sampling medium, this report shall be submitted if:

 $\frac{\text{concentration (1)}}{\text{reporting level (1)}} + \frac{\text{concentration (2)}}{\text{reporting level (2)}} + \dots \ge 1.0$

When radionuclides other than those in Table 4.12-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose to a MEMBER OF THE PUBLIC is equal to or greater than the calendar year limits of Specifications 3.11.1.2, 3.11.2.2 and 3.11.2.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report.

c. With milk or fresh leafy vegetable samples unavailable from one or more of the sample locations required by Table 4.12-1, identify locations for obtaining replacement samples and add them to the radiological environmental monitoring program within 30 days. The specific locations from which samples were unavailable may then be

RADIOLOGICAL ENVIRONMENTAL MONITORING

deleted from the monitoring program. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.12, identify the cause of the unavailability of samples and identify the new location(s) for obtaining replacement samples in the next Semiannual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

d. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.1.1 The radiological environmental monitoring samples shall be collected pursuant to Table 4.12-1 from the specific locations given in the table and figure(s) in the ODCM and shall be analyzed pursuant to the requirements of Table 4.12-1, the detection capabilities required by Table 4.12-3, and the guidance of the Radiological Assessment Branch Technical Position on Environmental Monitoring dated November, 1979, Revision No. 1.

TABLE 4.12-1

RADIOLOGICAL 'ENVIRONMENTAL MONITORING PROGRAM*

Exposure Pathway and/or Sample

Number of Samples and Sample Locations^a

DIRECT RADIATION

36 routine monitoring stations either with two or more dosimeters or with one instrument for measuring and recording dose rate continuously to be placed as follows: 1) an inner ring of stations, one in each meteorological sector within the SITE BOUNDARY; an outer ring of stations, one in each meteorological sector within 8 km range from the site; the balance of the stations to be placed in special interest areas such as population centers, nearby residences, schools, and in 1 or 2 areas to serve as control stations.

Sampling and Collection Frequency

Quarterly

Type and Frequency of Analysis

Gamma dose quarterly.

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> Radioiodine and Particulates

Samples from 5 locations:

3 samples from close а. to the 3 SITE BOUNDARY locations (in different sectors) of the highest calculated historical annual average groundlevel D/Q.

Continuous sampler (2/3 running time cycle), operation with sample collection weekly.

Radioiodine Cannister: I-131 analysis weekly.

Particulate Sampler: Gross beta radioactivity analysis following filter change; Gamma isotopic analysis of composite (by

*The number, media, frequency, and location of samples may vary from site to site. This table presents an acceptable minimum program for a site at which each entry is applicable. Local site characteristics must be examined to determine if pathways not covered by this table may significantly contribute to an individual's dose and should be included in the sampling program.

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RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample	Number of Samples and Sample Locations ^a	Sampling and Collection Frequency	Type and Frequency of Analysis
	b. 1 sample from the vicinity of a community having the highest calculated annual average groundlevel D/Q.		location) quarterly. ^d
	c. I sample from a control location 15-30 km distant and in the least prevalent wind direction.		
3. WATERBORNE a. Surface	a. l sample circulating water discharge	Sample off upstream, downstream and cooling lagoon.	d Gamma isotopic analysis monthly. Composite for tritium analysis quarterly
b. Ground	Samples from 1 or 2 sources only if likely to be affected.	Grab Monthly. Grab Quarterly	Gamma isotopic ^d and tritiu analysis quarterly.
c. Sediment	l sample from downstream area with existing or potential recreational value.	Semiannually	Gamma isotopic analysis ^d semiannually.

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RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposu and/	re Pathway or Sample	Number of Samples and Sample Locations	Sampling and Collection Frequency	Type and Frequency of Analysis
4. IN a.	GESTION Milk ^f a.	Samples from milking animals in 3 locations within 5 km distance having the highest dose potential. If there are none, then, 1 sample from milking animals in each of 3 areas between 5 to 8 km distant where doses are cal- culated to be greater than l mrem per yr.	Monthly at all times.	Gamma isotopic ^d and I-131 analysis monthly
	Ъ.	l sample from milking animals at a control location (15–30 km distant and in the least pre– valent wind direction).	· · ·	(
î b	. Fish and a Invertebrates	I sample of commercially and recreationally important species (bass, sunfish, catfish) in vicinity of plant discharge area.	Semiannually.	Gamma isotopic analysis on edible portions.
	b	. l sample of same species in areas not influenced by plant discharge.		

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RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample	Number of Samples and Sample Locations ^a	Sampling and Collection Frequency	Type and Frequency of Analysis
c. Food Products (cont'd)	a. Samples of an ediable broad leaf vegetation grown nearest each of two different offsite locations of highest predicted historical annual average ground- level D/Q if milk samp- ling is not performed.	Monthly if available, or at harvest.	Gamma isotopic ^d and I-131 analysis.
	b. 1 sample of broad leaf vegetation grown 15-30 km distant in the least prevalent wind direction if milk sampling is not performed.	Monthly if available, or at harvest.	Gamma isotopic ^d and I-131 analysis.

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TABLE NOTATION

^aSpecific parameters of distance and direction sector from the centerline of one reactor, and additional description where pertinent, shall be provided for each and every sample location in Table 4.12-1 in a table and figure(s) in the ODCM. Refer to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants, "October 1978, and to Radiological Assessment Branch Technical Positions, Revision 1, November 1979. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.11.1. It is recognized that, at times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances suitable alternative media and locations may be chosen for the particular pathway in question and appropriate substitutions made within 30 days in the radiological environmental monitoring program. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.12, identify the cause of the unavailability of samples for that pathway and identify the new location(s) for obtaining replacement samples in the next Semiannual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

^bOne or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. For the purposes of this table, a thermoluminescent dosimeter (TLD) is considered to be one phosphor; two or more phosphors in a packet are considered as two or more dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation. The 40 stations is not an absolute number. The number of direct radiation monitoring stations may be reduced according to geographical limitations; e.g., at an ocean site, some sectors will be over water so that the number of dosimeters may be reduced accordingly. The frequency of analysis or readout for TLD systems will depend upon the characteristics of the specific system used . and should be selected to obtain optimum dose information with minimal fading.

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TABLE NOTATION

^CAirborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than ten times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.

d Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.

^eThe dose shall be calculated for the maximum organ and age group, using the methodology and parameters in the ODCM.

f_{If milk sampling cannot be performed, use item 4.c.}

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Reporting Levels									
nalysis	Water (pCi/ ^g)	Airborne Particulate or Gases (pCi/m ²)	Fish (pCi/kg, wet)	Milk (pCi/l)	Food Products (pCi/kg, wet)				
1-3	30,000				•				
in-54 ·	1,000	· · · ·	30,000						
'e-59	400		10,000						
co-58	1,000		30,000						
co-60	300		10,000		·				
2n-65	300		20,000						
r-Nb-95	400								
[-131	. 2	0.9		3	100				
Cs-134	30	10	1,000	60	1,000				
	50	20	2,000	70	2,000				
Cs-137 Ba-La-140	200			300					

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		TAL	BLE 4.12-3			
	• *	DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS ^a				
	LOWER LIMIT OF DETECTION (LLD) ^b					
Analysis	Water (pCi/l)	Airborne Particulate or Gas (pCi/m ²)	Fish (pCi/kg,wet)	Milk (pCi/ℓ)	Food Products (pC1/kg,wet)	Sediment (pCi/kg,dry)
gross beta	4	0.01				
н-3	3000				•	. (
Mn-54	15	· .	130			Х.
Fe-59	30		260			
Co-58,60	15		130			
Zn-65	30		260	•		
Zr-Nb-95	15			•		
I-131	10*	0.07		1	60	
Cs-134	15	0.05	130	15	60	150
Cs-137	18	0.06	150	18	80	180
Ba-La-140	15	· .		15		· <u> (</u>

🚹 Ba-La-140

*The LLD for gamma isotopic analysis shall be used.

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TABLE 4.12-3 (Continued)

TABLE NOTATION

^aThis list does not mean that only these nuclides are to be considered. Other peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.

^bThe LLD is defined, for purposes of these Specifications, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system, which may include radiochemical separation :

$$LLD = \frac{4.66 \text{ s}_{b}}{\overline{F} \cdot V \cdot 2.22 \cdot Y \cdot \exp(-\lambda t)}$$

Where:

LLD is the "a priori" lower limit of detection as defined above, as picocuries per unit mass or volume,

s, is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute,

T is the counting efficiency, as counts per disintegration,

V is the sample size in units of mass or volume,

2.22 is the number of disintegrations per minute per picocurie,

Y is the fractional radiochemical yield, when applicable,

 $\boldsymbol{\lambda}$ is the radioactive decay constant for the particular radionuclide, and

 Δt for environmental samples is the elapsed time between sample collection, or end of the sample collection period, and time of counting

Typical values of E, V, Y and At should be used in the calculation.

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TABLE 4.12-2 (Continued)

TABLE NOTATION

It should be recognized that the LLD is defined as an <u>a priori</u> (before the fact) limit representing the capability of a measurement system and not as an <u>a posteriori</u> (after the fact) limit for a particular measurement. Analysis shall be performed in such a manner that the stated LLDs will be achieved under routine conditions. Occasionally background fluctuations, unavoidably small sample sizes, the presence of interfering nuclides, or other uncontrollable circumstances may render these LLDs unachievable. In such cases, the contributing factors will be identified and described in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.

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RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.2 LAND USE CENSUS

LIMITING CONDITION FOR OPERATION

3.12.2 A land use census shall be conducted and shall identify within a distance of 8 km (5 miles) the location in each of the 16 meteorological sectors of the nearest milk animal, the nearest residence and the nearest garden* of greater than 50 m² (500 ft²) producing broad leaf vegetation.

APPLICABILITY: At all times.

ACTION:

- a. With a land use census identifying a location(s) that yields a calculated dose or dose commitment greater than the values currently being calculated in Specification 4.11.2.3, in lieu of a Licensee Event Report, identify the new location(s) in the next Semiannual Radioactive Effluent Release Report, pursuant to Specification 6.9.1.12.
- b. With a land use census identifying a location(s) that yields a calculated dose or dose commitment (via the same exposure pathway) 25 percent greater than at a location from which samples are currently being obtained in accordance with Specification 3.12.1, add the new location(s) to the radiological environmental monitoring program within 30 days. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may be deleted from this monitoring program after (October 31) of the year in which this land use census was conducted. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.12, identify the new location(s) in the next Semiannual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.2 The land use census shall be conducted during the growing season at least once per 12 months using that information that will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities. The results of the land use census shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.

*Broad leaf vegetation sampling of at least three different kinds of vegetation may be performed at the site boundary in each of two different direction sectors with the highest predicted D/Qs in lieu of the garden census. Specifications for broad leaf vegetation sampling in Table 4.12-1.4c shall be followed, including analysis of control samples.

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RAPIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.3 INTERLABORATORY COMPARISON PROGRAM

LIMITING CONDITION FOR OPERATION

3.12.3 Analyses shall be performed on radioactive materials (which contain nuclides produced at nuclear power stations) supplied as part of an Interlaboratory Comparison Program, described in the ODCM, that has been approved by the Commission.

APPLICABILITY: At all times.

ACTION:

- a. With analyses not being performed as required above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.3 A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be maintained as described in the ODCM.

NORTH ANNA - UNIT 2

INSTRUMENTATION

BASES

3/4.3.3.9 RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents during actual or potential releases of liquid effluents. The alarm/ trip setpoints for these instruments shall be calculated and adjusted in accordance with the procedures in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50. The purpose of tank level indicating devices is to assure the detection and control of leaks that if not controlled could potentially result in the transport of radioactive materials to UNRESTRICTED AREAS.

3/4.3.3.10 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The alarm/ trip setpoints for these instruments shall be calculated and adjusted in accordance with the procedures in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. This instrumentation also includes provisions for monitoring (and controlling) the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50. 3/4.11 RADIOACTIVE St FLUENTS

BASES

3/4.11.1 LIQUID EFFLUENTS

3/4.11.1.1 CONCENTRATION

This specification is provided to ensure that the concentration of radioactive materials released in liquid waste effluents to UNRESTRICTED AREAS will be less than the concentration levels specified in 10 CFR Part 20, Appendix B, Table II, Column 2. This limitation provides additional assurance that the levels of radioactive materials in bodies of water in UNRESTRICTED AREAS will result in exposures within (1) the Section II.A design objectives of Appendix I, 10 CFR Part 50, to a MEMBER OF THE PUBLIC and (2) the limits of 10 CFR Part 20.106(e) to the population. The concentration limit for dissolved or entrained noble gases is based upon the assumption that Xe-135 is the controlling radioisotope and its MPC in air (submersion) was converted to an equivalent concentration in water using the methods described in International Commission on Radiological Protection (ICRP) Publication 2.

The required detection capabilities for radioactive materials in liquid waste samples are tabulated in terms of the lower limits of detection (LLDs). Detailed discussion of the LLD, and other detection limits can be found in HASL Procedures Manual, <u>HASL-300</u> (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry" <u>Anal. Chem. 40</u>, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report <u>ARH-SA-215</u> (June 1975).

3/4.11.1.2 DOSE

This specification is provided to implement the requirements of Sections II.A, III.A and IV.A of Appendix I, 10 CFR Part 50. The Limiting Condition for Operation implements the guides set forth in Section II.A of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in liquid effluents will be kept "as low as is reasonably achievable." Also, for fresh water sites with drinking water supplies that can be potentially affected by plant operations, there is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in the finished drinking water that are in excess of the requirements of 40 CFR Part 141. The dose calculations in the ODCM implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The equations specified in the ODCM for calculating the doses due to the actual release rates of radioactive materials in liquid effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.113; "Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I," April 1977.

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BASES

This Specification applies to the release of liquid effluents from each reactor at the site. For units with shared radwaste treatment systems, the liquid effluents from the shared system are proportioned among the units sharing that system.

3/4.11.1.3 LIQUID RADWASTE TREATMENT

The requirement that the appropriate portions of this system be used, when specified, provides assurance that the releases of radioactive materials in liquid effluents will be kept "as low as is reasonably achievable". This Specification implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50 and the design objective given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the liquid radwaste treatment system were specified as a suitable fraction of the dose design objectives set forth in Section II.A of Appendix I, 10 CFR Part 50, for liquid effluents.

3/4.11.1.4 LIQUID HOLDUP TANKS

The tanks listed in this Specification include all those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

Restricting the quantity of radioactive material contained in the specified tanks provides assurance that in the event of an uncontrolled release of the tanks' contents, the resulting concentrations would be less than the limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA.

3/4.11.2 GASEOUS EFFLUENTS

3/4.11.2.1 DOSE RATE

This Specification is provided to ensure that the dose at any time at and beyond the SITE BOUNDARY from gaseous effluents from all units on the site will be within the annual dose limits of 10 CFR Part 20. The annual dose limits are the doses associated with the concentrations of 10 CFR Part 20, Appendix B, Table II, Column 1. These limits provide reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of a MEMBER OF THE PUBLIC, either within or outside the SITE BOUNDARY to annual average concentrations exceeding the limits specified in Appendix B, Table II of 10 CFR Part 20 (10 CFR Part 20.106(b)). For MEMBERS OF THE PUBLIC, who may at times be within the SITE BOUNDARY the occupancy of the individual will be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the SITE BOUNDARY. The specified

BASES

release rate limits restrict, at all times, the corresponding gamma and beta dose rates above background to an individual at or beyond the SITE BOUNDARY to less than or equal to 500 mrems/year to the total body or to less than or equal to 3000 mrems/year to the skin. These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to a child via the inhalation pathway to less than or equal to 1500 mrems/year.

This Specification applies to the release of gaseous effluents from all reactors at the site. For units with shared radwaste treatment systems, the gaseous effluents from the shared system are proportioned among the units sharing that system.

The required detection capabilities for radioactive materials in gaseous waste samples are tabulated in terms of lower limits of detection (LLDs). Detailed discussion of the LLD, and other detection limits can be found in HASL Procedures Manual, <u>HASL-300</u> (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry" <u>Anal. Chem. 40</u>, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

3/4.11.2.2 DOSE - NOBLE GASES

This Specification is provided to implement the requirements of Sections II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. The Limiting Condition for Operation implements the guides set forth in Section II.B of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents will be kept "as low as is reasonably achievable." The Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The dose calculations established in the ODCM for calculating the doses due to the actual release rates of radioactive noble gases in gaseous effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors," Revision 1, July 1977. The ODCM equations provided for determining the air doses at and beyond the SITE BOUNDARY are based upon the historical average atmospheric conditions.

BASES

3/4.11.2.3 DOSE - IODINE-131, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

This Specification is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10 CFR Part 50. The Limiting Conditions for Operation are the guides set forth in Section II.C of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable." The ODCM calculational methods specified in the Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The ODCM calculational methods for calculating the doses due to the actual release rates of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors," Revision 1, July 1977. These equations also provide for determining the actual doses based upon the historical average atmospheric conditions. The release rate Specifications for iodine-131, radioiodines, tritium, and radionuclides in particulate form with half-lives greater than 8 days are dependent on the existing radionuclide pathways to man, in the areas at and The pathways that were examined in the development beyond the SITE BOUNDARY. inhalation of airborne 1) individual calculations were: these of radionuclides, 2) deposition of radionuclides onto green leafy vegetation with subsequent consumption by man, 3) deposition onto grassy areas where milk animals and meat producing animals graze with consumption of the milk and meat by man, and 4) deposition on the ground with subsequent exposure of man.

3/4.11.2.4 GASEOUS RADWASTE TREATMENT

The requirement that the appropriate portions of these systems be used, when specified, provides reasonable assurance that the releases of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable". This Specification implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50, and the design objectives given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the systems were specified as a suitable fraction of the dose design objectives set forth in Sections II.B and II.C of Appendix I, 10 CFR Part 50, for gaseous effluents.

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EASES

3/4.11.2.5 EXPLOSIVE GAS MIXTURE

This Specification is provided to ensure that the concentration of potentially explosive gas mixtures contained in the waste gas holdup system is maintained below the flammability limits of hydrogen and oxygen. Maintaining the concentration of hydrogen and oxygen below their flammability limits provides assurance that the releases of radioactive materials will be controlled in conformance with the requirements of General Design Criterion 60 of Appendix A to 10 CFR Part 50.

3/4.11.2.6 GAS STORAGE TANKS

The tanks included in this Specification are those tanks for which the quantity of radioactivity contained is not limited directly or indirectly by another Technical Specification to a quantity that is less than the quantity which provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting total body exposure to an individual at the nearest exclusion area boundary will not exceed 0.5 rem in an event of 2 hours.

Restricting the quantity of radioactivity contained in each gas storage tank provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting total body exposure to an individual at the nearest exclusion area boundary will not exceed 0.5 rem. This is consistent with Branch Technical Position ETSE 11-5 in NUREG-0800, July 1981.

3/4.11.3 SOLID RADIOACTIVE WASTE

This Specification implements the requirements of 10 CFR Part 50.36a and General Design Criterion 60 of Appendix A to 10 CFR Part 50. The process parameters included in establishing the PROCESS CONTROL PROGRAM may include, but are not limited to waste type, waste pH, waste/liquid/ SOLIDIFICATION agent/catalyst ratios, waste oil content, waste principal chemical constituents, mixing and curing times.

3/4.11.4 TOTAL DOSE

This Specification is provided to meet the dose limitations of 40 CFR Part 190 that have now been incorporated into 10 CFR Part 20 by 46 FR 18525. The Specification requires the preparation and submittal of a Special Report whenever the calculated doses from plant radioactive effluents exceed twice

BASES

the design objective doses of Appendix I. For sites containing up to 4 reactors, it is highly unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR Part 190 if the individual reactors remain within the reporting requirement level. The Special Report will describe a course of ACTION that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered. If the dose to any MEMBER OF THE PUBLIC is estimated to exceed the requirements of 40 CFR Part 190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40 CFR Part 190 have not already been corrected), in accordance with the provisions of 40 CFR Part 190.11 and 10 CFR Part 20.405c, is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 until NRC staff action is completed. The variance only relates to the limits of 40 CFR Part 190, and does not apply in any way to the other requirements for dose limitation of 10 CFR Part 20, as addressed in Specifications 3.11.1 and 3.11.2. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation that is part of the nuclear fuel cycle.

3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

BASES

3/4.12.1 MONITORING PROGRAM

The radiological environmental monitoring program required by this Specification provides representative measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of MEMBERS OF THE PUBLIC resulting from the station operation. This monitoring program implements Section IV.B.2 of Appendix I to 10 CFR Part 50 and thereby supplements the radiological effluent monitoring program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and the modeling of the environmental exposure pathways. The initially specified monitoring program will be effective for at least the first three years of commercial operation. Following this period, program changes may be initiated based on operational experience.

The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs). The LLDs required by Table 4.12-3 are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as an <u>a priori</u> (before the fact) limit representing the capability of a measurement system and not as an <u>a posteriori</u> (after the fact) limit for a particular measurement.

Detailed discussion of the LLD, and other detection limits, can be found in HASL Procedures Manual, <u>HASL-300</u> (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry" <u>Anal. Chem. 40</u>, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report <u>ARH-SA-215</u> (June 1975).

3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

BASES

3/4.12.2 LAND USE CENSUS

This Specification is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the radiological environmental monitoring program are made if required by the results of this census. The best information from the door-to-door survey, from aerial survey or from consulting with local agricultural authorities shall be used. This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50. Restricting the census to gardens of greater than 50 m² provides assurance that significant exposure pathways.via leafy vegetables will be identified and monitored since a garden of this size is the minimum required to produce the quantity (26 kg/year) of leafy vegetables assumed in Regulatory Guide 1.109 for consumption by a child. To determine this minimum garden size, the following assumptions were made: 1) 20% of the garden was used for growing broad leaf vegetation (i.e., similar to lettuce and cabbage), and 2) a vegetation yield of 2 kg/m².

3/4.12/3 INTERLABORATORY COMPARISON PROGRAM

The requirement for participation in an approved Interlaboratory Comparison Program is provided to ensure that independent checks on the precision and accuracy of the measurements of radioactive material in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring in order to demonstrate that the results are reasonably valid for the purposes of Section IV.B.2 of Appendix I to 10 CFR Part 50.

5.0 DESIGN FEATURES

5.1 SITE

EXCLUSION AREA

5.1.1 The exclusion area shall be as shown in Figure 5.1-1.

LOW POPULATION ZONE .

5.1.2 The low population zone shall be as shown in Figure 5.1-1.

MAP DEFINING UNRESTRICTED AREAS FOR RADIOACTIVE GASEOUS AND LIQUID EFFLUENTS

5.1.3 Information regarding radioactive gaseous and liquid effluents, which allows identification of structures and release points as well as definition of UNRESTRICTED AREAS within the SITE BOUNDARY that are accessible to MEMBERS OF THE PUBLIC, shall be as shown in Figure 5.1-1.

5.2 CONTAINMENT

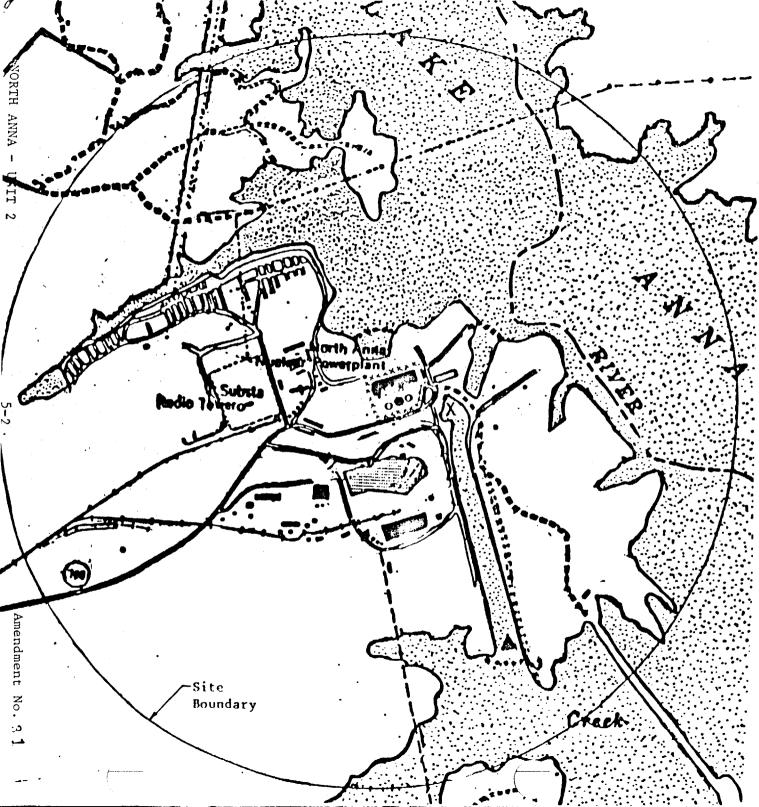
CONFIGURATION

5.2.1 The reactor containment building is a steel lined, reinforced concrete building of cylindrical shape with a dome roof and having the following design features:

- a. Nominal inside diameter = 126 feet.
- b. Nominal inside height = 190 feet, 7 inches.
- c. Minimum thickness of concrete walls = 4.5 feet.
- d. Minimum thickness of concrete roof = 2.5 feet.
- e. Minimum thickness of concrete floor pad = 10 feet.
- f. Nominal thickness of the cylindrial portion of the steel liner = 3/8 inches.
- g. Net free volume = 1.825 x 10⁶ cubic feet.
- h. Nominal thickness of hemispherical dome portion of the steel liner = 1/2 inch.

DESIGN PRESSURE AND TEMPERATURE

5.2.2. The reactor containment building is designed and shall be maintained for a maximum internal pressure of 45 psig and a temperature of 280°F.



- Gaseous Release
- 1. Process Vent- 157.5 ft.
- 2. Vent-Vent A&B and other release points considered ground level releases

X Liquid Release to the Discharge Canal

Liquid Release to the Unrestricted Area

•••Buoy Barriers

is unrestricted for gaseous effluents

Land Maximum Member of the Public Occupancy = 336 hrs/year

Lake Maximum Member of the Public Occupancy = 2232 hrs/year

Figure 5.1-1

<u>Map Defining Unrestricted</u> <u>Areas for Radioactive Gascous</u> <u>and Liquid Effluents</u>

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NORTH ANNA - UNIT 1

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MEETING FREQUENCY

6.5.1.4 The SNSOC shall meet at least once per calendar month and as convened by the SNSOC Chairman or his designated alternate.

QUORUM -

6.5.1.5 A quorum of the SNSOC shall consist of the Chairman or Vice-Chairman and two members including alternates.

RESPONSIBILITIES

- 6.5.1.6 The SNSOC shall be responsible for:
 - a. Review of 1) all procedures required by Specification 6.8.1 and changes thereto, 2) all programs required by Specification 6.8.4 and changes thereto, 3) any other proposed procedures or changes thereto as determined by the Station Manager to affect nuclear safety.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to Appendix "A" Technical Specifications.
 - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Manager-Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control.
 - f. Review of events requiring 24 hour written notification to the Commission.
 - g. Review of facility operations to detect potential nuclear safety hazards.
 - h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Station Nuclear Safety and Operating Committee.
 - i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Station Nuclear Safety and Operating Committee.
 - j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Station Nuclear Safety and Operating Committee.

- k. Review of every unplanned onsite release of radioactive material to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President-Nuclear Operations and to the Director-Safety Evaluation and Control.
- 1. Review and approve changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

AUTHORITY

- 6.5.1.7 The SNSOC shall:
 - a. Recommend to the Station Manager written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
 - b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
 - c. Provide written notification within 24 hours to Manager-Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control of disagreement between the SNSOC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the Manager-Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control.

6.5.2 SAFETY EVALUATION AND CONTROL (SEC)

FUNCTION

6.5.2.1 SEC shall function to provide independent review of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical and electrical engineering
- h. Administrative controls and quality assurance practices
- i. Other appropriate fields associated with the unique characteristics of the nuclear power plant

RECORDS (Cont'd)

- 4. Manager-Nuclear Technical Services
- 5. Manager-Quality Assurance, Operations
- 6. Others that the Director-Safety Evaluation and Control may designate.

6.5.3 QUALITY ASSURANCE DEPARTMENT

FUNCTION

6.5.3.1 The Quality Assurance Department shall function to audit station activities. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Station Emergency Plan and implementing procedures at least once per 12 months.
- f. The Station Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the Executive Manager-Quality Assurance or the Senior Vice President-Power Operations.
- h. The Station Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- 1. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- n. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

AUTHORITY

6.5.3.2 The Quality Assurance Department shall report to and advise the Executive Manager-Quality Assurance, who shall advise the Senior Vice President-Power Operations on those areas of responsibility specified in Section 6.5.3.1.

RECORDS

6.5.3.3 Records of the Quality Assurance Department audits shall be prepared and maintained in the department files. Audit reports shall be disseminated as indicated below:

- 1. Nuclear Power Station Manager
- 2. Manager-Nuclear Operations and Maintenance
- 3. Manager-Nuclear Technical Services
- 4. Manager-Quality Assurance, Operations
- 5. Director-Quality Assurance, Nuclear Operations
- 6. Director-Safety Evaluation and Control
- 7. Supervisor of area audited
- 8. Nuclear Power Station Resident Quality Control Engineer

6.6 REPORTABLE OCCURRENCE ACTION

- 6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:
 - a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
 - b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the SNSOC and submitted to the Director-Safety Evaluation and Control and the Manager-Nuclear Operations and Maintenance.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Manager-Nuclear Operations and Maintenance, and the Director-Safety Evaluation and Control shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSOC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Director-Safety Evaluation and Control and the Manager-Nuclear Operations and Maintenance within 14 days of the violation.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.

- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program Implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.
- i. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the SNSOC and approved by the Station Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the SNSOC and approved by the Station Manager within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation spray, safety injection, chemical and volume control, gas stripper, and hydrogen recombiners. The program shall include the following:

- (i) Preventive maintenance and periodic visual inspection requirements and
- (ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

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Any additional information needed to support the F_{xy}^{RTP} and P_{xy} submittal will be by request from the NRC and need not be included in this report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.11 Routine Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following initial criticality.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison (as appropriate) with preoperational studies, operational controls, and previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 3.12.2.

The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the Table and Figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 3.12.3; discussion of all deviations from the sampling schedule of Table 4.12-1 and discussion of all analyses in which the LLD required by Table 4.12-3 was not achievable.

*A single submittal may be made for a multiple unit station.

**One map shall cover stations near the SITE DOUNDARY; a second shall include the more distant stations.

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT*

6.9.1.12 Routine Radioactive Effluent Release Reports covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

The Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

The Radioactive Effluent Release Report shall be submitted within 60 days after January 1 of each year. This report shall include an assessment of the radiation doses to the maximum exposed MEMBERS OF THE PUBLIC due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year. Annual meteorological data collected over the previous year shall be in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability. This meteorological data shall be retained in a file on site and shall be made available to the NRC upon request. All assumptions used in making these assessments (i.e., specific activity, exposure time and location) shall be included in the OFFSITE DOSE CALCULATION MANUAL (ODCM). Concurrent meteorological conditions or historical annual average atmospheric dispersion conditions shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

If the dose to the maximum exposed MEMBER OF THE PUBLIC due to the radioactive liquid and gaseous effluents from the station during the previous calendar year exceeds twice the limits of Specification 3.11.1.2a, 3.11.1.2.b, 3.11.2.2.a, 3.11.2.2.b, 3.11.2.3.a, or 3.11.2.3.b the dose assessment shall include the contribution from direct radiation. The dose to the maximum exposed MEMBER OF THE PUBLIC shall show conformance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operation.

The Radioactive Effluent Release Reports shall include a list of unplanned releases as required to be reported in Technical Specification 6.9.1.9.e from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSITE DOSE CALCULATION MANUAL (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.12.2.

* A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

NORTH ANNA - UNIT 2

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator, Region II, within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirement of the applicable reference specification:

- a. Inservice Inspection Program Reviews shall be reported within 90 days of completion. Specification 4.0.5
- b. ECCS Actuation shall be reported within 90 days of the occurrence. The report shall describe the circumstances of the actuation and the total accumulated cycles to date. Specification 3.5.2 and 3.5.3.
- c. With the primary coolant specific activity >1.0 uCi/gram DOSE EQUIVALENT I-131 or >100/E uCi/gram, a specific activity analysis shall be included in the REPORTABLE OCCURRENCE report required pursuant to Specification 6.9.1.7. The information requested in Specification 3.4.8 shall also be included in that report.
- d. With sealed source or fission detector leakage tests revealing the presence of ≥ 0.005 microcuries of removable contamination submit a special report on an annual basis outlining the corrective actions taken to prevent the spread of contamination. Specification 4.7.11.1.3.
- e. With the MTC more positive than 0 △k/k/°F submit a special report within the next 10 days describing the value of the measured MTC, the interim control rod withdrawal limits and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition. Specification 3.1.1.4.
- f. For any abnormal degradation of the structural integrity of the reactor vessel or the Reactor Coolant System pressure boundary detected during the performance of Specification 4.4.10.1, an initial report shall be submitted within 10 days after detection and a detailed report submitted within 90 days after the completion of Specification 4.4.10.1.
- g. For any abnormal degradation of the containment structure detected during the performance of Specification 4.6.1.6.2, an initial report shall be submitted within 10 days after completion of Specification 4.6.1.6.2. A final report, which includes (1) a description of the condition of the liner plate and concrete, (2) inspection procedure, (3) the tolerance on cracking and (4) the corrective actions taken, shall be submitted within 90 days after the completion of Specification 4.6.1.6.2.
- h. Inoperable Fire Detection Instrumentation, Specification 3.3.3.7.
- i. Inoperable Fire Suppression Systems, Specifications 3.7.14.1, 3.7.14.2, 3.7.14.3, 3.7.14.4 and 3.7.14.5.

NORTH ANNA - UNIT 2

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. Each REPORTABLE OCCURRENCE submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to Operating Procedures.
- f. Records of radioactive shipments.
- g. Records of sealed source leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material release to the environs.
- f. Records of transient or operational cycles for those facility component identified in Table 5.7-1.

- g. Records of reactor tests and experiments.
- h. Records of training and qualification for current members of the plant staff.
- i. Records of in-service inspections performed pursuant to these Technical Specifications.
- j. Records of Quality Assurance activities required by the QA Manual.
- k. Records of the service life of all hydraulic and mechanical snubbers listed in Tables 3.7-4a and 3.7-4b including the date at which the service life commences and associated installation and maintenance records.
- 1. Records of reviews performed for changes made to procedures or equipment or reviews of tests and eperiments pursuant to 10 CFR 50.59.
- m. Records of meetings of the SNSOC.
- n. Records of meetings of the System Nuclear Safety and Operating Committee to issuance of Amendment No. _____.
- o. Records of secondary water sampling and water quality.
- p. Records for Environmental Qualification which are covered under the provisions of Paragraph 2.C(4)(e) of License No. NPF-7.
- q. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This would include procedures effective at specified times and QA records showing that these procedures were followed.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance

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Amendment No. 11, 31

thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in the protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Health Physicist.

*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry in high radiation areas.

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6.13 PROCESS CONTROL PROGRAM (PCP)

- 6.13.1 Licensee initiated changes to the PCP:
 - Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
 - b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the SNSOC.
 - 2. Shall become effective upon review and acceptance by the SNSOC.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

- 6.14.1 The ODCM shall be approved by the Commission prior to implementation.
- 6.14.2 Licensee initiated changes to the ODCM:
 - 1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s);
 - b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the SNSOC.
 - 2. Shall become effective upon review and acceptance by the SNSOC.

6.15 MAJOR CHANGES TO RADIOACTIVE SOLID WASTE TREATMENT SYSTEMS*

- 6.15.1 Licensee initiated major changes to the radioactive solid waste systems:
 - 1. Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by SNSOC. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59.
 - b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d. An evaluation of the change, in quantity of solid waste that differs from those previously predicted in the license application and amendments thereto;
 - e. An evaluation of the change, which shows the expected maximum exposures to individual in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto;
 - f. A comparison of the predicted releases of radioactive materials, in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - g. An estimate of the exposure to plant operating personnel as a result of the change; and
 - h. Documentation of the fact that the change was reviewed and found acceptable by SNSOC.
 - 2. Shall become effective upon review and acceptance by SNSOC.

*Licensees may chose to submit the information called for in this Specification as part of the annual FSAR update.

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APPENDIX B

TO FACILITY OPERATING LICENSE NO. NPF-7 NORTH ANNA POWER STATION, UNIT NO. 2

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET_NO. 50-339

ENVIRONMENTAL PROTECTION PLAN

DECEMBER 1980

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION SUPPORTING AMENDMENT NOS. 48 AND 31 TO FACILITY OPERATING LICENSE NOS. NPF-4 AND NPF-7 VIRGINIA ELECTRIC AND POWER COMPANY NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2 DOCKET NOS. 50-338 AND 50-339

1.0 INTRODUCTION

states.

To comply with Section V of Appendix I of 10 CFR Part 50, the Virginia Electric and Power Company has filed with the Commission plans and proposed technical specifications developed for the purpose of keeping releases of radioactive materials to unrestricted areas during normal operations, including expected operational occurrences, as low as is reasonably achievable. The Virginia Electric and Power Company filed this information with the Commission by letter dated December 17, 1982,* which requested changes to the Technical Specifications appended to Facility Operating License Nos. NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2. The proposed technical specifications update those portions of the technical specifications addressing radioactive waste management and make them consistent with the current staff positions as expressed in NUREG-0472. These revised technical specifications would reasonably assure compliance, in radioactive waste management, with the provisions of 10 CFR Part 50.36a, as supplemented by Appendix I to 10 CFR Part 50, with 10 CFR Parts 20.105(c), 106(g), and 405(c); with 10 CFR Part 50, Appendix A, General Design Criteria 60, 63, and 64; and with 10 CFR Part 50, Appendix B.

*and with a supplement dated March 3, 1983,

2.0 BACKGROUND AND DISCUSSION

2.1 Regulations

10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities", Section 50,36a, "Technical Specifications on Effluents from Nuclear Power Reactors", provides that each license authorizing operation of a nuclear power reactor will include technical specifications that (1) require compliance with applicable provisions of Part 20.106, "Radioactivity in Effluents to Unrestricted Areas"; (2) require that operating procedures developed for the control of effluents be established and followed; (3) require that equipment installed in the radioactive waste system be maintained and used; and (4) require the periodic submission of reports to the NRC specifying the quantity of each of the principal radionuclides released to unrestricted areas in liquid and gaseous effluents, any quantities of radioactive materials released that are significantly above design objectives, and such other information as may be required by the Commission to estimate maximum potential radiation dose to the public resulting from the effluent releases.

10 CFR Part 20, "Standards for Protection Against Radiation," paragraphs 20.105(c), 20.106(g), and 20.405(c), require that nuclear power plant and other licensees comply with 40 CFR Part 190, "Environmental Radiation Protection Standards for Nuclear Power Operations" and submit reports to the NRC when the 40 CFR Part 190 limits have been or may be exceeded.

10 CFR Part 50, Appendix A - General Design Criteria for Nuclear Power Plants, contains Criterion 60, Control of releases of radioactive materials to the environment; Criterion 63, Monitoring fuel and waste storage; and Criterion 64, Monitoring radioactivity releases. Criterion 60 requires that the nuclear power unit design include means to control suitably the release of radioactive materials in gaseous and liquid effluents and to handle radioactive solid wastes produced during normal reactor operation, including anticipated operational occurrences. Criterion 63 requires that appropriate systems be provided in radioactive waste systems and associated handling areas to detect conditions that may

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result in excessive radiation levels and to initiate appropriate safety actions. Criterion 64 requires that means be provided for monitoring effluent discharge paths and the plant environs for radioactivity that may be released from normal operations, including anticipated operational occurrences and postulated accidents.

10 CFR Part 50, Appendix B, establishes quality assurance requirements for nuclear power plants.

10 CFR Part 50, Appendix I, Section IV, provides guides on technical specifications for limiting conditions for operation for light-watercooled nuclear power reactors licensed under 10 CFR Part 50.

2.2 Standard Radiological Effluent Technical Specifications

NUREG-0472 provides radiological effluent technical specifications for pressurized water reactors which the staff finds to be an acceptable standard for licensing actions. Further clarification of these acceptable methods is provided in NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants." NUREG-0133 describes methods found acceptable to the staff of the NRC for the calculation of certain key values required in the preparation of proposed radiological effluent technical specifications for light-water-cooled nuclear power plants. NUREG-0133 also provides guidance to licensees in preparing requests for changes to existing radiological effluent technical specifications for operating reactors. It also describes current staff positions on the methodology for estimating radiation exposure due to the release of radioactive materials in effluents and on the administrative control of radioactive waste treatment systems.

The above NUREG documents address all of the radiological effluent technical specifications needed to assure compliance with the guidance and requirements provided by the regulations previously cited. However, alternative approaches to the preparation of radiological effluent

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technical specifications and alternative radiological effluent technical specifications may be acceptable if the staff determines that the alternatives are in compliance with the regulations and with the intent of the regulatory guidance.

The standard radiological effluent technical specifications can be grouped under the following categories:

- (1) Instrumentation
- (2) Radioactive effluents
- (3) Radiological environmental monitoring
- (4) Design features
- (5) Administrative controls

Each of the specifications under the first three categories is comprised of two parts: the limiting condition for operation and the surveillance requirements. The limiting condition for operation provides a statement of the limiting condition, the times when it is applicable, and the actions to be taken in the event that the limiting condition is not met.

In general, the specifications established to assure compliance with 10 CFR Part 20 standards provide, in the event the limiting conditions of operation are exceeded, that without delay conditions are restored to within the limiting conditions. Otherwise, the facility is required to effect approved shutdown procedures. In general, the specifications established to assure compliance with 10 CFR Part 50 provide, in the event the limiting conditions of operation are exceeded, that within specified times corrective actions are to be taken, alternative means of operation are to be employed, and certain reports are to be submitted to the NRC describing these conditions and actions.

The specifications concerning design features and administrative controls contain no limiting conditions of operation or surveillance requirements.

Table 1 indicates the standard radiological effluent technical specifications that are needed to assure compliance with the particular provisions of the regulations described in Section 1.0.

Table 1. Relation Between Provisions of the Regulations and the Standard Radiological Effluent Technical Specifications for Pressurized Water Reactors and Boiling Water Reactors

	· · · ·					alE	ffluent Tecl	nnical Spec	ificatio	ons		
	Instru- Radioactive Effluents			tivo Co	introl							
	menta-	Liguid	G	aseou	S (VIII)		Rad. Envir.	Design Features	. Adm	mistre	LIVE CL	
	tion	Liquid	PWRZBWR	PWR	BWR		Monitoring	reatures				
Indicate the specifications that are needed to assure compliance with the identified provision of the regulations.	id Effl. Monitoring Effl. Monitoring	it Concentration Radwaste Treatment Holdup Tanks	te ble Gases 131. Trit. and Part. ve Gas Mixture	adwaste T ge Tanks	adwaste T on Exhaus enser II Conta	Radioactive Waste Dose	Monitoring Program Census Comparison Program	ldar i es*	id Audits ss	•	Retention Control Program	e Dose Calc. Manual Changes to Rad. Systems
Provisions of Title 10 Code of Federal Regulations	Rad. Liquid Rad. Gas. Ef	Effluent Dose Liquid Ra Liquid Ho	Dose Rate Dose Noble Dose I-131 Explosive	l ∾ Ö	Gaseous R Ventilati Main Cond Mark I or	Solid Ra Total Do	Rad. Env. Land Use (Interlab.	Site Boundaries*	Review and Procedures	Reports	Record Ru Process	Offsite Major Ch
Provisions of fittle 10 code of rederal Regulations 5 50.36a Technical specifications on effluents from nuclear power reactors Remain within limits of § 20.106 Establish and follow procedures to control effluents Maintain and use radioactive waste system equipment Submit reports, semi-annual and other 33 20.105(c), 20.106(g), 20.405(c) Compliance with 40 CFR 190 Part 50 Appendix A - General Design Criteria Criterion 60 - Control of releases of radioactiv materials to the environment Criterion 61 - Fuel storage and handling and radioactivity control Criterion 63 - Monitoring fuel and waste storage Criterion 64 - Monitoring radioactivity releases Part 50 Appendix B - Quality Assurance Criteria Part 50 Appendix B - Quality Assurance Criteria Part 50 Appendix B - Quality Assurance Criteria Part 50 Appendix I - Guides to Meet "As Low As Is Reasonably Achievable (ALARA Maintain releases within design objectives Establish surveillance & monitoring program to provide data on: (1) quantities of rad. matls. in effluents (2) radiation & rad. matls. in the environment (3) changes in use of unrestricted areas Exert best efforts to keep releases "ALARA" Submit report if calculated doses exceed the					••••	•			•		•	
design objective Demonstrate conform. to des. obj. by calc. proce Part 100	d.	•	••	•	•							•

*liote: lleeded to fully implement other specifications.

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3.0 EVALUATION

The attached report (TER-C5506-101/102) was prepared for us by Franklin Research Center (FRC) as part of our technical assistance contract program. Their report provides their technical evaluation of the compliance of the licensee's submittal with NRC provided criteria. The staff has reviewed the TER and agrees with the evaluation.

3.1 Safety Conclusions

The proposed radiological effluent technical specifications for North Anna Power Station Units 1 and 2 have been evaluated, reviewed, and found to be in compliance with the requirements of the NRC regulations and with the intent of NUREG-0133 and NUREG-0472 (the North Anna plant is comprised of two pressurized water reactors) and thereby fulfill all the requirements of the regulations related to radiological effluent technical specifications.

The proposed changes will not remove or relax any existing requirement related to the probability or consequences of accidents previously considered and do not involve a significant hazards consideration.

The proposed changes will not remove or relax any existing requirement needed to provide reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner.

4.0 ENVIRONMENTAL CONSIDERATION

We have determined that the issuance of the proposed amendments to the Technical Specifications appended to Facility Operating License Nos. NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2 would not authorize a significant change in the types, or a significant increase in the amounts, of effluents or in the authorized power level, and that the amendment will not result in any significant environmental impact. Having made these determinations, we have further concluded that the amendments involve an action which is insignificant from the standpoint

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of environmental impact and, pursuant to 10 CFR Part 50.5(d)(4), that an environmental impact statement, negative declaration, or environmental impact appraisal need not be prepared in connection with the issuance of these amendments.

5.0 GENERAL CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) because the amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated, do not create the possibility of an accident of a type different from any evaluated previously, and do not involve a significant reduction in a margin of safety, the amendments do not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: May 5, 1983

Attachment: FRC TER

Principal Contributors: W. Meinke, RAB, DSI F. Congel, RAB, DSI C. Willis, MTEB, DSI

TECHNICAL EVALUATION REPORT

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATION IMPLEMENTATION (A-2)

VIRGINIA ELECTRIC POWER COMPANY

NORTH ANNA POWER STATION UNITS 1 AND 2

NRC DOCKET NO. 50-338, 50-339

NRCTACNO. 8147, 8148

NRC CONTRACT NO. NRC-03-81-130

FRC PROJECT C5506 FRC ASSIGNMENT 4 FRC TASKS 101, 102

Prepared by

Franklin Research Center 20th and Race Streets Philadelphia, PA 19103

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March 18, 1983

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FOREWORD

This Technical Evaluation Report was prepared by Franklin Research Center under a contract with the U.S. Nuclear Regulatory Commission (Office of Nuclear Reactor Regulation, Division of Operating Reactors) for technical assistance in support of NRC operating reactor licensing actions. The technical evaluation was conducted in accordance with criteria established by the NRC.

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1. INTRODUCTION

1.1 PURPOSE OF REVIEW

The purpose of this technical evaluation report (TER) is to review and evaluate the proposed changes in the Technical Specifications of North Anna Power Station Units 1 and 2 with regard to Radiological Effluent Technical Specifications (RETS), the Offsite Dose Calculation Manual (ODCM), and the Process Control Program (PCP).

The evaluation uses criteria proposed by the NRC staff in the Model Technical Specifications for pressurized water reactors (PWRS), NUREG-0472 [1]. This effort is directed toward the NRC objective of implementing RETS which comply principally with the regulatory requirements of the Code of Federal Regulations, Title 10, Part 50 (10CFR50), "Domestic Licensing of Production and Utilization Facilities," Appendix I [2]. Other regulations pertinent to the control of effluent releases are also included within the scope of compliance.

1.2 GENERIC BACKGROUND

Since 1970, 10CFR50, Section 50.36a, "Technical Specifications on Effluents from Nuclear Power Reactors," has required licensees to provide technical specifications which ensure that radioactive releases will be kept as low as reasonably achievable (ALARA). In 1975, numerical guidance for the ALARA requirement was issued in 10CFR50, Appendix I. The licensees of all operating reactors were required [3] to submit, no later than June 4, 1976, their proposed ALARA Technical Specifications and information for evaluation in accordance with 10CFR50, Appendix I.

However, in February 1976, the NRC staff recommended that proposals to modify Technical Specifications be deferred until the NRC completed the model RETS. The model RETS deals with radioactive waste management systems and environmental monitoring. Although the model RETS closely parallels 10CFR50, Appendix I requirements, it also includes provisions for addressing other issues.

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These other issues are specifically stipulated by the following regulations:

- l0CFR20 [4], "Standards for Protection Against Radiation," Paragraphs 20.105(c), 20.106(g), and 20.405(c) require that nuclear power plants and other licensees comply with 40CFR190 [5], "Environmental Radiation Protection Standards for Nuclear Power Operations," and submit reports to the NRC when the 40CFR190 limits have been or may be exceeded.
- O 10CFR50, Appendix A [6], "General Design Criteria for Nuclear Power Plants," contains Criterion 60 - Control of releases of radioactive materials to the environment; Criterion 63 - Monitoring fuel and waste storage; and Criterion 64 - Monitoring radioactivity releases.
- l0CFR50, Appendix B [7], establishes the quality assurance required for nuclear power plants.

The NRC position on the model RETS was established in May 1978 when the NRC's Regulatory Requirements Review Committee approved the model RETS: NUREG-0472 for PWRs [1] and NUREG-0473 [8] for boiling water reactors (BWRs). Copies were sent to licensees in July 1978 with a request to submit proposed site-specific RETS on a staggered schedule over a 6-month period. Licensees responded with requests for clarifications and extensions.

The Atomic Industrial Forum (AIF) formed a task force to comment on the model RETS. NRC staff members first met with the AIF task force on June 17, 1978. The model RETS was subsequently revised to reflect comments from the AIF and others. A principal change was the transfer of much of the material concerning dose calculations from the model RETS to a separate ODCM.

The revised model RETS was sent to licensees on November 15 and 16, 1978 with guidance (NUREG-0133 [9]) for preparation of the RETS and the ODCM and a new schedule for responses, again staggered over a 6-month period.

Four regional seminars on the RETS were conducted by the NRC staff during November and December 1978. Subsequently, Revision 2 of the model RETS and additional guidance on the ODCM and a Process Control Program (PCP) were issued in February 1979 to each utility at individual meetings. In response to the NRC's request, operation reactor licensees have subsequently submitted initial proposals on plant RETS and the ODCM. Review leading to ultimate

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Franklin Research Center A Division of The Franklin Institute implementation of these documents was initiated by the NRC in 1981 using subcontracted independent teams as reviewers.

As the RETS review process has progressed since September 1981, feedback from the licensees has led the NRC to believe that modification to some provisions in the current version of Revision 2 is needed to better clarify specific concerns of the licensees and thus expedite the entire review process. Starting in April 1982, NRC distributed revised versions of RETS in draft form to the licensees during the site visits. The new guidance on these changes was presented in the AIF meeting on May 19, 1982 [10]. Some interim changes regarding the Radiological Environmental Monitoring Section were issued in August 1982 [11]. With the incorporation of these new changes, NRC issued, in September 1982, a draft version of NUREG-0472, Revision 3 [12], to serve as new guidance for the review teams.

1.3 PLANT-SPECIFIC BACKGROUND

In conformance with the 1975 directive [3], Virginia Electric and Power Company (VEPCO), the Licensee for North Anna Units 1 and 2, submitted information for 10CFR50, Appendix I Evaluation, dated June 4, 1976 [13].

The RETS was addressed in the next submittal by the Licensee, dated March 6, 1979 [14]. The submittal was a response to the November 15-16, 1978 NRC request and followed the format of NUREG-0472 for PWRs. On June 28, 1979, the Licensee submitted the ODCM [15], which had been reviewed and approved by the North Anna Chairman of Station Nuclear Safety and Operating Committee. On March 8, 1982, Franklin Research Center (FRC), selected as an independent reviewer, initiated a review and evaluation of the RETS and ODCM submittals. These submittals were compared to the model RETS [1] and to the general provisions for the ODCM [16] which were given to each operating reactor (OR) as guidelines for preparing the RETS and the ODCM. The Licensee's RETS submittal was assessed for compliance with the requirements of lOCFR50, Appendix I, and the "General Design Criteria," lOCFR50, Appendix A.

Copies of the draft review dated April 26, 1982 [17, 18] were delivered to the NRC and to the Licensee prior to a site visit to the VEPCO corporate

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office in Richmond, VA. The purpose of the prearranged site visit was to resolve questions raised in the draft reviews.

The site visit was conducted on May 12-14, 1982. Discussions were held with VEPCO and North Anna Station personnel to review the RETS and ODCM reports. Two open items remained to be resolved. The remaining questions or "open items" were agreed upon, at which time the Licensee made a commitment to resubmit drafts of the RETS and ODCM by August 15, 1982. A trip report, dated July 6, 1982 [19], which covered the site visit to North Anna Power Station, was prepared and delivered to the NRC. The report included the resolutions reached, as well as "open items" to be resolved by the NRC with the Licensee.

On September 22, 1982, revised draft copies [20] of the Licensee's RETS and ODCM were reviewed by the FRC review team. Comments on the draft RETS were supplied to the NRC on October 13, 1982 [21]; the evaluation was based on the draft model RETS, NUREG-0472, Revision 3 [12]. An evaluation of the ODCM submittal of September 22, 1982 was conducted, and eight points of clarification to the submittal were delivered to the NRC on October 20, 1982 [22]. On November 9, 1982, a conference call was held between VEPCO and FRC [23]; this call was sanctioned by the NRC in order for the Licensee to resolve ODCM questions directly with the reviewer. All points of clarification were discussed and agreed upon by the Licensee. The recommended changes were to be incorporated in the resubmittal, targeted for November 30, 1982.

Under a cover letter dated December 17, 1982, VEPCO delivered their final proposed RETS, ODCM, and PCP [24] to the NRC. Copies of these submittals were delivered to FRC on December 22, 1982. The Licensee's RETS submittal was reviewed against NUREG-0472 [12]. The ODCM was also evaluated according to the existing guidelines specified by NUREG-0133 [9]. The PCP was reviewed against NRC guidelines dated January 7, 1983 [25]. The review also incorporated the additional guidance FRC received from the NRC staff on plant-specific issues [26].

Details of the RETS review are documented in the comparison copy [27].

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2. REVIEW CRITERIA

Review criteria for the RETS and ODCM were provided by the NRC in three

documents:

NUREG-0472, RETS for PWRs

NUREG-0473, RETS for BWRs

NUREG-0133, Preparation of RETS for Nuclear Power Plants.

Twelve essential criteria are given for the RETS and ODCM:

- All significant releases of radioactivity shall be controlled and monitored.
- 2. Offsite concentrations of radioactivity shall not exceed the 10CFR20, Appendix B, Table II limits.
- 3. Offsite doses of radioactivity shall be ALARA.
- 4. Equipment shall be maintained and used to keep offsite doses ALARA.
- 5. Radwaste tank inventories shall be limited so that failures will not cause offsite doses exceeding 10CFR20 limits.
- 6. Waste gas concentrations shall be controlled to prevent explosive mixtures.
- 7. Wastes shall be processed to shipping and burial ground criteria under a documented program, subject to quality assurance verification.
- 8. An environmental monitoring program, including a land-use census, shall be implemented.
- 9. The radwaste management program shall be subject to regular audits and reviews.
- 10. Procedures for control of liquid and gaseous effluents shall be maintained and followed.
- 11. Periodic and special reports on environmental monitoring and on releases shall be submitted.
- 12. Offsite dose calculations shall be performed using documented and approved methods consistent with NRC methodology.

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Subsequent to the publication of NUREG-0472 and NUREG-0473, the NRC staff issued guidelines [28, 29], clarifications [30, 31], and branch positions [32, 33, 34] establishing a policy that requires the licensees of operating reactors to meet the intent, if not the letter, of the model RETS provisions. The NRC branch positions issued since the RETS implementation review began have clarified the model RETS implementation for operating reactors.

The review of the ODCM was based on the following NRC guidelines: Branch Technical Position, "General Content of the Offsite Dose Calculation Manual" [16]; NUREG-0133 [9]; and Regulatory Guide 1.109 [35]. The ODCM format is left to the licensee and may be simplified by tables and grid printouts.

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3. TECHNICAL EVALUATION

3.1 GENERAL DESCRIPTION OF RADIOLOGICAL EFFLUENT SYSTEMS

This section briefly describes the liquid and gaseous radwaste effluent systems, release paths, and control systems installed at North Anna Power Station Units 1 and 2; both are PWRs.

3.1.1 Radioactive Liquid Effluent

The liquid waste treatment system for the North Anna plant is common to both Units 1 and 2 (Figure 1). The liquid waste is primarily collected in highand low-level waste drain tanks. This includes chemical and volume control, vent and drain sumps, spent resin flush, and hot laboratory drains for highlevel waste; and vent and drain sumps, boron recovery test tanks, and fluid water treatment for low-level waste. All liquid waste is dumped into clarifier equipment which separates, through flat bed filters, the solid waste. The liquid radwaste effluent is then passed through demineralizers and then to the discharge tunnel. The liquid radwaste effluent line is monitored by LW-111, which provides alarm and automatic termination capability. The service water effluent line is monitored by SW-108. These two effluents lines, together with the condenser circulating water, lead to the circulating water discharge tunnel where monitors (SW-130, SW-230) are installed to monitor the liquid effluents before discharging into Lake Anna. The turbine building (floor drain) sump effluents are released directly to the station storm drain system; however, the Licensee does not provide on-line monitoring for this effluent line.

3.1.2 Radioactive Gaseous Effluent

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The gaseous waste treatment system for the North Anna plant is also common to both Units 1 and 2 (Figure 2).

The process effluent from the recombiner is stored in the decay tank, where the effluents are released together with other streams into the process vent where releases are considered as mixed mode. The process vent has monitors GW-101 and GW-102 which have capabilities to automatically isolate

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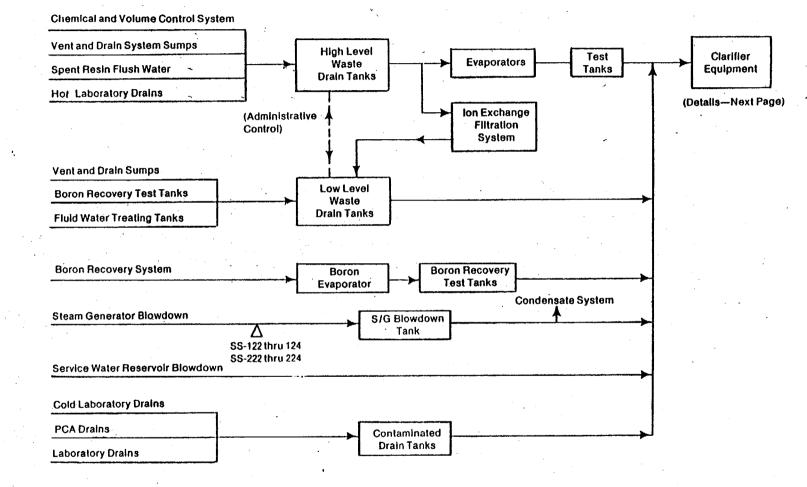
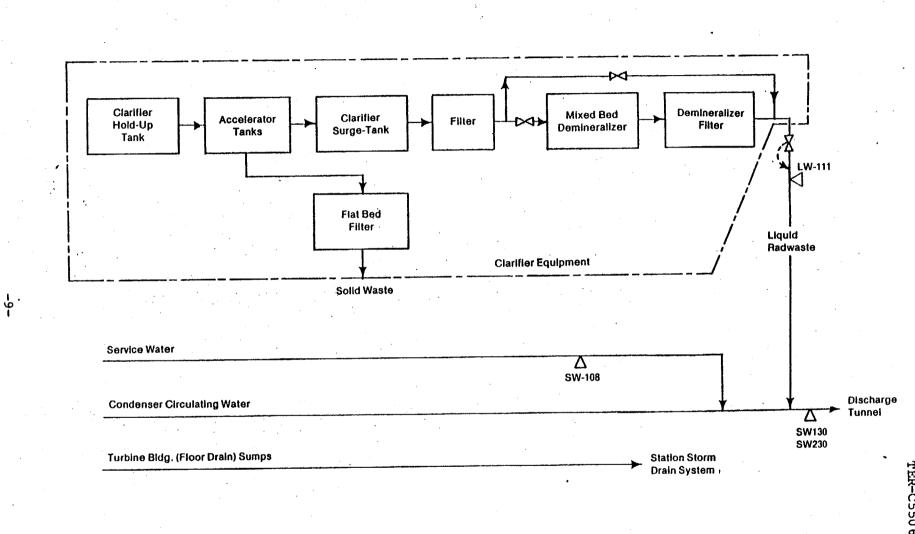


Figure 1. Liquid Radwaste Treatment Systems, Effluent Paths, and Controls for North Anna Power Station Units 1 and 2

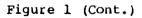
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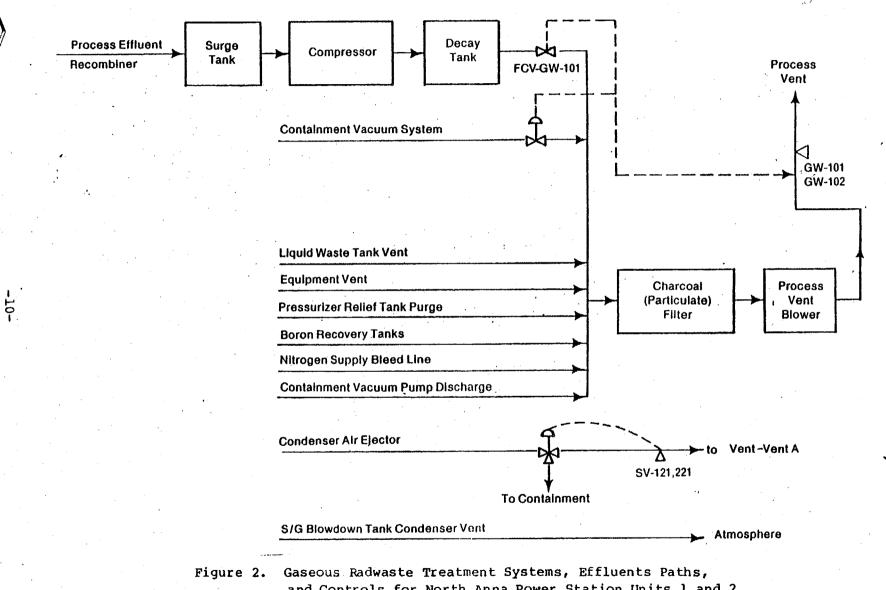
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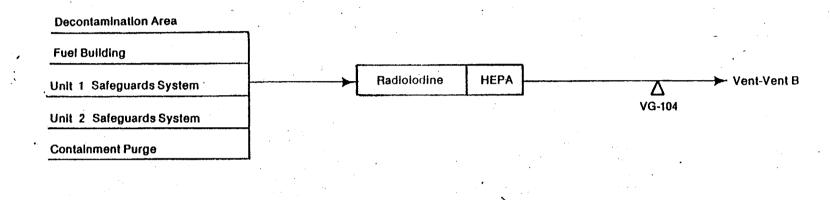


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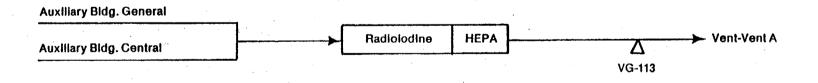


Figure 2 (Cont.)

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the effluent releases from the decay tanks and the containment vacuum system, respectively.

The vent-vent system consists of two effluent lines. Vent-vent A is monitored by VG-ll3 and services the auxiliary building only, whereas ventvent B is monitored by VG-l04 and services the decontamination area, fuel building, and containment purge system. Releases from the vent-vent system are considered as ground level. The condenser air ejector line, which is monitored by SV-l21 and SV-221, discharges gaseous effluents through vent-vent A. These two monitors are also capable of automatically isolating the releases from the the condenser air ejector.

The steam generator blowdown (SGB) vent condenser condenses iodine-131 in the steam which is returned to the SGB stream for discharge through the clarifiers. Surveillance of the steam generator blowdown vent system is maintained by a grab sample program described in the Licensee's proposed RETS, Table 4.11-2, Radioactive Sampling and Analysis Program.

3.2 RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS

The evaluation of the Licensee's proposed RETS against the provisions of NUREG-0472 included the following:

- o a review of information provided by the Licensee in the 1979 proposed RETS submittal [14]
- o resolution of problem areas in that submittal by means of a site visit
 [19]
- o review of the Licensee's September 16, 1982 draft submittal [20]
- o review of the Licensee's December 17, 1982 final submittal [24].

3.2.1 Effluent Instrumentation

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The objective of the RETS with regard to effluent instrumentation is to ensure that all significant liquid and gaseous effluent releases are monitored. The RETS specify that all effluent monitors be operable and that alarm/trip setpoints be determined in order to ensure that radioactive levels do not

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exceed the maximum permissible concentration (MPC) set by 10CFR20. To further ensure that the instrumentation functions properly, surveillance requirements are also needed in the specifications.

The Licensee has provided radiation monitors for potential liquid or gaseous effluent lines. In addition, automatic isolation is provided for major effluent lines such as the liquid radwaste effluent and the gaseous waste decay tank effluent.

Although the Licensee does not monitor the turbine building liquid effluents, a commitment has been made to sample and analyze the turbine building sump if the activity of the secondary coolant exceeds 1×10^{-5} µCi/ml. The Licensee has established an ongoing sampling and analysis program for the batch release tanks as well as for continuous releases, as described in the Licensee's final submittal.

Since the effluents from the steam generator blowdown are not vented directly to the atmosphere, the alternative provided by the sampling program satisfies the alternative provisions discussed in NUREG-0133 for the steam generator blowdown vent. The Licensee has also established a sampling and analysis program for effluents released from the waste gas storage tank, containment purge, process vent, vent-vent system, condenser air ejector, and the steam generator blowdown.

The Licensee's proposed RETS submittal on liquid and gaseous effluent monitoring instrumentation has satisfied the provisions set forth in the model RETS and thus meets the intent of NUREG-0472.

3.2.2 Concentration and Dose Rates of Effluents

3.2.2.1 Liquid Effluent Concentration

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In Section 3.11.1.1 of the Licensee's submittal, a commitment is made to maintain the concentration of radioactive liquid effluents released from the site to the unrestricted areas to within 10CFR20 limits, and if the concentration of liquid effluents to the unrestricted area exceeds these

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limits, it will be restored without delay to a value equal to or less than the MPC values specified in 10CFR20. Both batch and continuous releases are sampled and analyzed periodically in accordance with a sampling and analysis program (Table 4.11-1 of the Licensee's submittal), which meets the intent of NUREG-0472.

3.2.2.2 Gaseous Effluent Dose Rate

In Section 3.11.2.1 of the Licensee's submittal, a commitment is made to maintain the offsite gaseous dose rate from the site to areas at and beyond the site boundary to within 10CFR20 limits, and if the concentration of gaseous effluents exceeds these limits or the equivalent dose values, it will be restored without delay to a value equal to or less than these limits.

The radioactive gaseous waste sampling and analysis program (Table 4.11-2 of the Licensee's submittal) provides adequate sampling and analysis of the vent discharges, including the substreams, and therefore meets the intent of NUREG-0472.

3.2.3 Offsite Doses from Effluents

The objective of the RETS with regard to offsite doses from effluents is to ensure that offsite doses are kept ALARA, are in compliance with the dose specifications of NUREG-0472, and are in accordance with 10CFR50, Appendix I, and 40CFR190. The Licensee has made a commitment to (1) meet the quarterly and yearly dose limitations for liquid effluents, per Section 3.11.1.2 [1]; (2) restrict the air doses for beta and gamma radiation in unrestricted areas as specified in 10CFR50, Appendix I, Section II.B; (3) maintain the dose level to the maximally exposed member of the public from releases of iodine-131, tritium, and particulates with half-lives greater than 8 days within the design objectives of 10CFR50, Appendix I, Section II.C; and (4) limit the annual dose to the maximally exposed member of the public due to releases of radioactivity and radiation from uranium fuel cycle sources to within the requirements of 40CFR190. This satisfies the intent of NUREG-0472.

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3.2.4 Effluent Treatment

The objective of the RETS with regard to effluent treatment is to ensure that wastes are treated to keep releases ALARA and to satisfy the provisions for Technical Specifications governing the maintenance and use of radwaste treatment equipment. The Licensee has made a commitment to use the liquid and gaseous radwaste treatment system when the projected doses averaged over 31 days exceed 25% of the annual dose design objectives, prorated monthly. The Licensee has also made a commitment to use the ventilation exhaust treatment system if the monthly projected dose exceeds the limits prescribed in NUREG-0472. This meets the intent of 10CFR50, Appendix I, Section II.D. The Licensee has also made a commitment to project the monthly dose in accordance with the ODCM. This also meets the intent of NUREG-0472.

3.2.5 Tank Inventory Limits

The objective of the RETS with regard to tank inventory limits is to ensure that the rupture of a radwaste tank would not cause offsite doses greater than the limits set in 10CFR20 for non-occupational exposure. The Licensee has put a curie limit of 10 curies on all outside liquid tanks listed in the specifications and has made a commitment to perform surveillance according to the provisions of NUREG-0472. This limit excludes tritium and dissolved or entrained noble gases. For gas storage tanks, a curie limit of 25,000 curies has been set for noble gases which are considered to be represented by xenon-133. The Licensee's commitment to comply with tank inventory limits has satisfied the intent of NUREG-0472.

In addition to the proposed Specification 3.11.2.6, "Gas Storage Tanks," the Licensee submitted Attachment 3 to the proposed RETS [24], "Justification of Monthly Sampling of Waste Gas Decay Tanks," as a recommended change to Specification 4.11.2.6 surveillance requirements. The Licensee stated:

"Based upon the justification presented in this report, it is recommended that the surveillance requirements for the Waste Gas Decay Tanks contained in the Radiological Effluent Technical Specifications (Section 4.11.2.6) be revised as follows: The quantity of radioactive material contained in the Waste Gas Decay Tank shall be determined to be within the above

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limits (< 25,000 curies considered as Xe-133) at least once per month when the specific activity of the primary coolant is < 1.0 μ Ci/g of DOSE EQUIVALENT I-131. Under conditions which result in the specific activity being greater than 1.0 μ Ci/g of DOSE EQUIVALENT I-131, the Waste Gas Storage Tanks shall be sampled once per 24 hours."

The statements made by the Licensee, including the calculations in Attachment 3, are satisfactory and meet the intent of NUREG-0472.

3.2.6 Explosive Gas Mixtures

The objective of the RETS with regard to explosive gas mixtures is to prevent hydrogen explosions in the waste gas systems. The Licensee has stated that the waste gas holdup system is hydrogen-rich and is not designed to withstand a hydrogen/oxygen explosion. The Licensee has made a commitment to maintain a safe concentration in this system. Although the Licensee does not have the number of channels specified in the model RETS (a redundant hydrogen and oxygen monitor), the present system meets the intent on an interim basis according to the NRC branch position and was deemed acceptable at the site visit of March 11-12, 1982 [20].

3.2.7 Solid Radwaste System

The objective of the RETS with regard to the solid radwaste system is to ensure that radwaste will be properly processed and packaged before it is shipped to a burial site, in accordance with 10CFR71 and Specification 3.11.3 of NUREG-0472. The Licensee has made a commitment to establish a PCP, or the equivalent, to show compliance with this objective. The Licensee has provided assurance that 10CFR20 requirements will also be met, thereby satisfying the intent of NUREG-0472.

3.2.8 Radiological Environmental Monitoring Program

The objectives of the RETS with regard to environmental monitoring are to ensure that (1) an adequate full-area-coverage (land and water inclusive) monitoring program exists; (2) the requirements of 10CFR50, Appendix I for technical specifications on environmental monitoring are satisfied; and (3)

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the Licensee maintains both a land-use census and interlaboratory comparison program.

The Licensee has followed NUREG-0472 guidelines, including the Branch Technical Position dated November 1979 [33], and has provided an adequate number of sample locations for pathways identified.

The 36 thermoluminescent dosimeter (TLD) monitoring stations proposed by the Licensee satisfy the specification of NUREG-0472, which indicates no less than 40 monitoring stations for a full land coverage, because a portion of the area is underwater and cannot facilitate TLDs. The Licensee's method of analysis and maintenance of the monitoring program satisfies the requirements of Appendix I, 10CFR50. The Licensee has also made a commitment to describe the specific sample locations in the ODCM. This meets the intent of NUREG-0472.

The commitments to a yearly land-use census within NUREG-0472 specifications and to an ongoing interlaboratory comparison program equivalent to the model RETS guidelines on environmental monitoring meet the intent of NUREG-0472.

3.2.9 Audits and Reviews

The objective of the RETS with regard to audits and reviews is to ensure that audits and reviews of the radwaste and environmental monitoring programs are properly conducted. The Licensee's administrative structure designates the station nuclear safety and operating committee (SNSOC) and the quality assurance department (QA) as the two groups responsible for reviews and audits, respectively. Their responsibilities also include the ODCM, PCP, and QA program. The two committees encompass the total responsibility for reviews and audits as specified in NUREG-0472.

3.2.10 Procedures and Records

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The objective of the RETS with regard to procedures is to satisfy the provisions for written procedures for implementing the ODCM, PCP, and QA program. It is also an objective of RETS to properly retain the documented

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records in relation to the environmental monitoring program and certain QA procedures. The Licensee has made a commitment to establish, implement, and maintain written procedures for the PCP, ODCM, and QA program in accordance with the provisions of NUREG-0472. The Licensee intends to retain the records of the radiological environmental monitoring program, as well as the records of quality assurance activities for the duration of the facility operating license. It is thus determined that the Licensee has met the intent of NUREG-0472.

3.2.11 Reports

In addition to the reporting requirements of Title 10, Code of Federal Regulations (10CFR), the objective of the RETS with regard to administrative controls is also to ensure that appropriate periodic and special reports are submitted to the NRC.

The Licensee has made a commitment to follow applicable reporting requirements stipulated by 10CFR regulations and also the following reports specified by NUREG-0472:

- 1. <u>Annual radiological environmental operating report</u>. In Section 6.9.1.11 of the Licensee's submittal, a commitment is made to provide an annual radiological environmental operating report that includes summaries, interpretations, and statistical evaluation of the results of the environmental surveillance program. The report also includes the results of land use censuses, and participation in an interlaboratory comparison program specified by Specification 3.12.3 of NUREG-0472.
- 2. Semiannual radioactive and solid waste release reports. In Section 6.9.1.12 of the Licensee's submittal, a commitment is made to provide semiannual radioactive effluent and solid waste release reports which include a summary of radioactive liquid and gaseous effluents and solid waste released, an assessment of offsite doses, and a list of unplanned releases. Listing of new location for dose calculations identified by the land use census as well as any changes to ODCM, PCP, and major changes to radioactive waste treatment systems are also included in the report.

3. <u>Special report</u>. The Licensee has made a commitment to file a 30-day special report to the NRC under the following conditions as prescribed by the proposed specifications:

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- o exceeding liquid effluent dose limits according to Specifications
 3.11.1-2 and 3.11.1-3
- o exceeding gaseous effluent dose limits according to Specifications
 3.11.2-2, 3.11.2-3, and 3.11.2-4
- o exceeding total dose limits according to Specification 3.11.4
- o exceeding the reporting levels of Table 4.12-2 for the radioactivity measured in the environmental sampling medium.

These reporting commitments have satisfied the provisions of NUREG-0472.

3.2.12 Implementation of Major Programs

One objective of the administrative controls is to ensure that implementation of major programs such as the PCP, ODCM, and major changes to the radioactive waste treatment system follow appropriate administrative procedures. The Licensee has made a commitment to review, report, and implement major programs such as the PCP, ODCM, and major changes to the radioactive waste treatment system. This commitment meets the intent of NUREG-0472.

3.3 OFFSITE DOSE CALCULATION MANUAL (ODCM)

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As specified in NUREG-0472, the ODCM is to be developed by the Licensee to document the methodology and approaches used to calculate offsite doses and maintain the operability of the effluent system. As a minimum, the ODCM should provide equations and methodology for the following topics:

- o alarm and trip setpoint on effluent instrumentation
- o liquid effluent concentration in unrestricted areas
- o gaseous effluent dose rate at or beyond the site boundary
- o liquid and gaseous effluent dose contributions
- o liquid and gaseous effluent dose projections.

In addition, the ODCM should contain flow diagrams, consistent with the systems being used at the station, defining the treatment paths and the components of the radioactive liquid, gaseous, and solid waste management systems. A description and the location of samples in support of the environmental monitoring program are also needed in the ODCM.

3.3.1 Evaluation

The Licensee has followed the methodology of NUREG-0133 [9] to determine the alarm and trip setpoints for the liquid and gaseous effluent monitors. To ensure that the MPC, as specified in 10CFR20, will not be exceeded even in the case of simultaneous discharge, the Licensee will adjust the setpoints according to the apportionment of the radioactivity released from each perspective effluent line.

The Licensee has demonstrated the method of calculating the radioactive liquid concentration by describing in the ODCM the means of collecting and analyzing representative samples prior to and after releasing liquid effluents into the circulating water discharge. The method provides added assurance of compliance with 10CFR20 for liquid releases.

Methods are also included for showing that dose rates at or beyond the site boundary due to noble gases, iodine-131, tritium, and radionuclides in particulate form with half-lives greater than 8 days are in compliance with 10CFR20. In this calculation, the Licensee has considered effluent releases from the process vent and the vent-vents (A and B); releases from the process vent are treated as mixed mode, and releases from the vent-vents are treated as ground level. In all cases, the Licensee has used the highest annual average values of relative concentration (X/Q) and relative deposition (D/Q)to determine the controlling locations. The Licensee intends to use the maximally exposed individual and the critical organ as the reference receptor. For noble gases, the Licensee has considered the total body dose and the skin dose resulting from gamma and beta radiation, respectively. For iodine-131, tritium, and particulates, the Licensee has considered the inhalation pathway for estimating the doses. The Licensee has demonstrated that the described methods and relevant parameters have followed the conservative approaches provided by NUREG-0133 and Regulatory Guide 1.109.

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Evaluation of the cumulative dose is to ensure that the quarterly and annual dose design objectives specified in RETS are not exceeded.

For liquid releases, the Licensee has identified drinking water and fish consumption as the two viable pathways. In the calculation, the Licensee has used a near-field dilution factor specific to the plant; all other key parameters follow the suggested values given in Regulatory Guide 1.109. The Licensee has used the maximally exposed adult individual as the reference receptor. To correctly assess the cumulative dose, the Licensee intends to estimate the dose once per 31 days.

Evaluation of the cumulative dose from noble gas releases includes both beta and gamma and air doses at and beyond the site boundary. The critical organs under consideration are the total body and skin for gamma and beta radiation, respectively. Again, the Licensee has used the maximum (X/Q)values as discussed earlier and has followed the methodology and parameters of NUREG-0133 and Regulatory Guide 1.109.

For iodine-131, tritium, and particulates with half-lives greater than 8 days, the Licensee has provided a method to demonstrate that cumulative doses calculated from the release meet both quarterly and annual design objectives. The Licensee has demonstrated a method of calculating the dose using maximum annual average (X/Q) values for the inhalation pathway and has included (D/Q) values for the grass-cow-milk pathway for ingestion, for which the Licensee considered the infant to be the critical age group and thyroid to be the critical organ. This approach is consistent with the methodology of NUREG-0133.

Using the existing methodology for gaseous and liquid dose calculations, the Licensee has demonstrated a procedure to project the monthly dose and to ensure that the design objectives for the liquid radwaste system and the gaseous radwaste system are not exceeded.

Adequate flow diagrams defining the effluent paths and components of the radioactive liquid and gaseous waste treatment systems have been provided by the Licensee. Radiation monitors specified in the Licensee-submitted RETS are also properly identified in the flow diagrams.

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The Licensee has provided a description of sampling locations in the ODCM and has identified them in Section 13 of that document. This description is consistent with the sampling locations specified in the Licensee's RETS Table 4.12-1 on environmental monitoring.

In summary, the Licensee's ODCM uses documented and approved methods that are consistent with the methodology and guidance in NUREG-0133, and, therefore, is an acceptable reference.

3.4 PROCESS CONTROL PROGRAM (PCP)

NUREG-0472 specifies that the Licensee develop a PCP to ensure that the processing and packaging of solid radioactive wastes will be accomplished in compliance with l0CFR20, l0CFR71, and other federal and state regulations or requirements governing the offsite disposal of the low-level radioactive waste.

The PCP is not intended to contain a set of detailed procedures; rather, it is the source of basic criteria for the detailed procedures to be developed by the Licensee. The criteria used for the PCP are to address only today's requirements. The uncertainty about PCP requirements results from the recent promulgation of 10CFR61, "Licensing Requirements for Land Disposal of Radioactive Waste." The NRC staff's technical positions are presently being developed by the Division of Waste Management [25].

3.4.1 Evaluation

The Licensee has made a commitment to process all liquid wet wastes prior to shipment offsite; has provided general descriptions for laboratory mixing for deriving process parameters, and sampling for solidification; and has referenced plant and contractor procedures for verifying the absence of free liquid in containers. The Licensee has also made a commitment to follow plant procedures and exercise controls in keeping the doses ALARA. These commitments satisfy the intent of the NRC Guidelines [25].

In summary, it is concluded that the Licensee complies with the NRC criteria for PCP implementation except for oily wastes for which the Licensee

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did not provide a description of the method for treatment. The Licensee has made a commitment to establish technical specifications for radwaste processing and packaging consistent with NRC guidelines.

4. CONCLUSIONS

The Licensee submitted the same Radiological Effluent Technical Specifications (RETS), Offsite Dose Calculation Manual (ODCM), and Process Control Program (PCP) for both Units 1 and 2 of North Anna Nuclear Power Station. Table 1 summarizes the results of the final review and evaluation of the RETS submittal. Comments apply equally to Units 1 and 2.

The following conclusions were reached:

- The Licensee's proposed RETS, submitted December 17, 1982, meets the intent of the NRC staff's "Standard Radiological Effluent Technical Specifications," NUREG-0472, for North Anna Power Station Units 1 and 2.
- 2. The Licensee's ODCM, submitted December 17, 1982, uses documented and approved methods that are applicable to North Anna Power Station Units 1 and 2 and are consistent with the criteria of NUREG-0133.
- 3. The Licensee's PCP, submitted December 17, 1982 and evaluated against NRC Guidelines [25], complies with the NRC criteria for implementing the PCP, except for oily wastes.

Franklin Research Center A Division of The Franklin Institute Table 1. Evaluation of Proposed Radiological Effluent Technical Specifications (RETS), North Anna Power Station Units 1 and 2

. * • * . . •	Technical Sp NRC Staff Std. RETS NUREG-0472 (Section)*		Replaces or Updates Existing Tech. Specs. (Section)	Evaluation		
	(Beccion)	(Section)				
Effluent Instrumentation	3/4.3.3.3.10 3/4.3.3.3.11	3/4.3.3.3.10 3/4.3.3.3.11	3.3.3.1 Appendix A	Meets the intent of NRC criteria		
Radioactive Effluents	3/4.11.1.1 3/4.11.2.1	3/4.11.1.1 3/4.11.2.1	To be added to Appendix A	Meets the intent of NRC criteria		
Offsite Doses	3/4.11.1.2, 3/4.11.2.2, 3/4.11.2.3, 3/4.11.4	3/4.11.1.2, 3/4.11.2.2, 3/4.11.2.3, 3/4.11.4	To be added to Appendix A	Meets the intent of NRC criteria		
Effluent Treatment	3/4.11.1.3 3/4.11.2.4	3/4.11.1.3 3/4.11.2.4	To be added to Appendix A	Meets the intent of NRC criteria		
Tank Inventory Limits	3/4.11.1.4 3/4.11.2.6	3/4.11.1.4 3/4.11.2.6	To be added to Appendix A	Meets the intent of NRC criteria		
Explosive Gas Mixtures	3/4.11.2.5B	3/4.11.2.5	To be added to Appendix A	Meets the intent of NRC criteria on an interim basis		
Solid Radioactive Waste	3/4.11.3	3/4.11.3	To be added to Appendix A	Meets the intent of NRC criteria		
Environmental Monitoring	3/4.12.1	3/4.12.1	To be added to Appendix A	Meets the intent of NRC criteria		
Audits and Reviews	6.5.1, 6.5.2	6.5.1.4, 6.5.3	6.5.1.6, 6.5.2.1, 6.5.2.7	Meets the intent of NRC criteria		
Procedures and Records	6.8, 6.10	6.8, 6.10	6.8, 6.10	Meets the intent of NRC criteria		
Reports	6.9	6.9	6.9	Meets the intent of NRC criteria		
Implementation of Major Programs	6.13, 6.14, 6.15	6.15, 6.16, 6.17	To be added to Appendix A	Meets the intent of NRC criteria		

*Section number sequence is according to NUREG-0472, Rev. 3, Draft 7' [12].



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5. REFERENCES

- "Radiological Effluent Technical Specifications for Pressurized Water Reactors," Rev. 2 NRC, July 1979 NUREG-0472
- 2. Title 10, Code of Federal Regulations, Part 50, Appendix I, "Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion, 'As Low As Is Reasonably Achievable,' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents"
- 3. Title 10, Code of Federal Regulations, Part 50, Appendix I, Section V, "Effective Dates"
- 4. Title 10, Code of Federal Regulations, Part 20, "Standards for Protection Against Radiation"
- 5. Title 40, Code of Federal Regulations, Part 190, "Environmental Radiation Protection Standards for Nuclear Power Operations"
- Title 10, Code of Federal Regulations, Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants"
- 7. Title 10, Code of Federal Regulations, Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants"
- 8. "Radiological Effluent Technical Specifications for Boiling Water Reactors," Rev. 2 NRC, July 1979 NUREG-0473
- 9. "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants, A Guidance Manual for Users of Standard Technical Specifications" NRC, October 1978 NUREG-0133
- 10. C. Willis and F. Congel (NRC)
 "Summary of Draft Contractor Guidance of RETS"
 Presented at the AIF Environmental Subcommittee Meeting, Washington, DC
 May 19, 1982

11. F. Congel (NRC)
Memo to RAB Staff (NRC)
Subject: Interim Changes in the Model Radiological Effluent Technical
Specifications (RETS)
August 9, 1982

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- 12. "Radiological Effluent Technical Specifications for Pressurized Water Reactors," Rev. 3, Draft 7', intended for contractor guidance in reviewing RETS proposals for operating reactors NRC, September 1982 NUREG-0472
- 13. Submittal of North Anna Power Station, Units 1 and 2 "Requirements of Section VB of Appendix I, 10CFR Part 50" June 4, 1976
- 14. Amendments to Operating License for North Anna, Units 1 and 2 "Proposed Technical Specifications, Change No. 17" March 5, 1979
- 15. C. M. Stallings (VEPCO) Letter to H. Denton (USNRC) with ODCM attached July 3, 1979
- 16. "General Contents of the Offsite Dose Calculation Manual," Rev. 1 NRC, 1979
- 17. "Radiological Effluent Technical Specification Implementation, Comparison of Plant and Model RETS" Franklin Research Center, Draft dated April 26, 1982
- 18. "Radiological Effluent Technical Specification Implementation, Technical Review of Plant Offsite Dose Calculation Manual" Franklin Research Center, Draft dated April 26, 1982
- 19. "Trip Report of Site Visit to North Anna Units 1 and 2," prepared by A. Cassell/S. Pandey (FRC, sent to C. Willis/F. Congel/W. Meinke (NRC) July 6, 1982)
- 20. "VEPCO-North Anna, Units 1 and 2, RETS and ODCM," Final Draft Copy with Attachment 3, "Justification for Deviations," authored by E. R. Smith September 16, 1982
- 21. Informal Technical Communication from S. Pandey/A. Cassell (FRC) to F. Congel/C. Willis/W. Meinke (USNRC) "RETS Review Questions" October 13, 1982

22. "ODCM Review of North Anna, Units 1 and 2, Final Submittal with Eight Points Requiring Clarification" Informal Technical Communication from A. Cassell/S. Pandey (FRC) to F. Congel/C. Willis/W. Meinke (USNRC) October 20, 1982

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- 23. Telephone Conference between J. Liberstein/A. Stafford L./Thomasson/ G. Shukla (VEPCO), and A. Cassell/S. Y. Chen (FRC), to resolve questions on clarification of ODCM, submitted to NRC under Reference No. 23, dated November 9, 1982
- 24. D. L. Stewart (VEPCO) Letter of Transmittal to NRC Subject: Request for Amendment Change, "Amendment to Operating Licensee NPF-7, North Anna Power Station Units 1 and 2, Proposed Technical Specification Changes" December 17, 1982
- 25. C. Willis (NRC) Letter to S. Pandey (FRC) Subject: Criteria for Process Control Program January 7, 1983
- 26. Telephone Conversation between NRC Staff and VEPCO, as summarized by W. Meinke (NRC) Subject: Resolution of Fifteen Discrepancies in RETS Draft of September 16, 1982, for North Anna Power Station Units 1 and 2 November 1, 1982
- 27. "Comparison of Specification NUREG-0472, Radiological Effluent Technical Specifications for PWRs, vs. Licensee Final Submittal, dated December 17, 1982, of Radiological Effluent Technical Specifications for North Anna Power Station Units 1 and 2" Franklin Research Center, January 27, 1983
- 28. C. Willis (NRC) Letter to S. Pandey (FRC) Subject: Changes to RETS requirements following meeting with Atomic Industrial Forum (AIF) November 20, 1981
- 29. C. Willis (NRC) Letter to S. Pandey (FRC) Subject: Control of explosive gas mixture in PWRs December 18, 1981
- 30. C. Willis and F. Congel (NRC) "Status of NRC Radiological Effluent Technical Specification Activities" Presented at the AIF Conference on NEPA and Nuclear Regulations, Washington, D.C. October 4-7, 1981
- 31. C. Willis (NRC) Memo to P. C. Wagner (NRC) "Plan for Implementation of RETS for Operating Reactors" November 4, 1981

- 32. W. P. Gammill (NRC) Memo to P. C. Wagner (NRC) "Current Position on Radiological Effluent Technical Specifications (RETS) Including Explosive Gas Controls" October 7, 1981
- 33. "An Acceptable Radiological Environmental Monitoring Program" Radiological Assessment Branch Technical Position, Revision 1 November 1979
- 34. Methods for Demonstrating LWR Compliance with the EPA Uranium Fuel Cycle Standard (40CFR190) NRC, February 1980 NUREG-0543
- 35. Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10CFR50, Appendix I NRC, October 1977 Regulatory Guide 1.109, Rev. 1

UNITED STATES NUCLEAR REGULATORY COMMISSION DOCKET NOS. 50-338 AND 50-339 VIRGINIA ELECTRIC AND POWER COMPANY NOTICE OF ISSUANCE OF AMENDMENTS TO FACILITY OPERATING LICENSES

7590-01

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment Nos. 48 and 31 to Facility Operating License Nos. NPF-4 and NPF-7 issued to the Virginia Electric and Power Company (the licensee) for operation of the North Anna Power Station, Units No. 1 and No. 2 (the facility) located in Louisa County, Virginia. The amendments are effective as of the date of issuance and must be fully implemented no later than January 1, 1984.

The amendments revise the Technical Specifications (1) to implement the requirements of Appendix I to 10 CFR Part 50, (2) to establish new limiting conditions for operation for the quarterly and annual average release rates, and (3) to revise environmental monitoring programs to assure conformance with Commission regulations.

The application for the amendments complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in these license amendments. Prior public notice of these amendments was not required since these amendments do not involve a significant hazards consideration.

7590-01

The Commission has determined that the issuance of the amendments will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with issuance of these amendments.

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For further details with respect to this action, see (1) the application for amendments dated December 17, 1982 as supplemented March 3, 1983; (2) Amendment Nos. 48 and 31 to Facility Operating License Nos. NPF-4 and NPF-7 and (3) the Commission's related Safety Evaluation. These items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D. C. 20555 and at the Board of Supervisors Office, Louisa County Courthouse, Louisa, Virginia 23093 and at the Alderman Library, Manuscripts Department, University of Virginia, Charlottesville, Virginia 22901. A copy of items (2) and (3) may be obtained upon request to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Licensing.

Dated at Bethesda, Maryland this 5th day of May, 1983.

FOR THE NUCLEAR REGULATORY COMMISSION

Kall. M. Traimel

Charles M. Trammell, Acting Chief Operating Reactors Branch #3 Division of Licensing