

May 9, 1988

Docket Nos. 50-338
and 50-339

Mr. D. S. Cruden
Vice President - Nuclear
Virginia Electric and Power Company
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Dear Mr. Cruden:

SUBJECT: NORTH ANNA UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: DIESEL-DRIVEN
FIRE PUMP SURVEILLANCE REQUIREMENTS (TAC NOS. 67598 AND 67599)

The Commission has issued the enclosed Amendment Nos. 101 and 88 to Facility Operating License Nos. NPF-4 and NPF-7 for the North Anna Power Station, Units No. 1 and No. 2 (NA-1&2). The amendments revise the Technical Specifications (TS) in response to your letter dated March 3, 1988.

The amendments revise the NA-1&2 TS 3.4.7.14 regarding the operational status of NA-1&2 and the 18-month surveillance requirement for the diesel-driven fire pump. The changes will allow operation of both units when conducting the surveillance by requiring the establishment and demonstration of operability of the backup fire suppression system when the diesel-driven fire pump is inoperable for performance of the 18-month inspection.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by

Leon B. Engle, Project Manager
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 101 to NPF-4
2. Amendment No. 88 to NPF-7
3. Safety Evaluation

cc w/enclosures:
See next page

*SEE PREVIOUS CONCURRENCE

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Mr. D. S. Cruden
Virginia Electric & Power Company

North Anna Power Station
Units 1 and 2

cc:

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

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

DOCKET NO. 50-339

NORTH ANNA POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 101
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, et al., (the licensee) dated March 3, 1988, 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.

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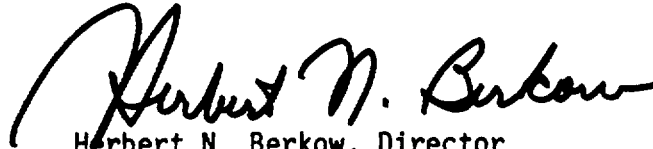
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.D.(2) of Facility Operating License No. NPF-4 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 101, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance and shall be implemented within 14 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 9, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 101

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.

Page

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PLANT SYSTEMS

3/4.7.14 FIRE SUPPRESSION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.14.1 The fire suppression water system shall be OPERABLE with:

- a. Two high pressure pumps, each with a capacity of 2500 gpm, with their discharge aligned to the fire suppression header,
- b. Separate water supplies from the North Anna Reservoir and the Service Water Reservoir, and
- c. An OPERABLE flow path capable of taking suction from the North Anna Reservoir and the Service Water Reservoir and transferring the water through distribution piping with OPERABLE sectionalizing control or isolation valves to the yard hydrant curb valves and the valve at each hose standpipe as required to be OPERABLE per Specification 3.7.14.5.

APPLICABILITY: At all times.

ACTION:

- a. With one pump and/or one water supply inoperable, restore the inoperable equipment to OPERABLE status within 7 days or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the plans and procedures to be used to provide for the loss of redundancy in this system. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.
- b. With only the diesel driven fire pump inoperable for performance of the diesel engine inspection required by Specification 4.7.14.1.2.c, establish and demonstrate operability of a backup fire suppression system within 24 hours. If the diesel driven fire pump is not restored to OPERABLE status within 7 days, ACTION "a" applies.
- c. With the fire suppression water system otherwise inoperable:
 1. Establish a backup fire suppression water system within 24 hours, and
 2. Submit a Special Report in accordance with Specification 6.9.2:
 - a) By telephone within 24 hours,
 - b) Confirmed by telegraph, mailgram or facsimile transmission no later than the first working day following the event, and

PLANT SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

- c. In writing within 14 days following the event, outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.7.14.1.1 The fire suppression water system shall be demonstrated OPERABLE:

- a. By verifying the contained water supply volumes pursuant to Specification 4.7.5.1.
- b. At least once per 31 days on a STAGGERED TEST BASIS by starting each pump and operating it for at least 15 minutes on recirculation flow.
- c. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path is in its correct position.
- d. By performance of a system flush as necessary to maintain the system water chemistry within acceptable limits.
- e. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- f. At least once per 18 months by performing a system functional test which includes simulated automatic actuation of the system throughout its operating sequence, and:
 1. Verifying that each automatic valve in the flow path actuates to its correct position,
 2. Verifying that each pump develops at least 2500 gpm at a system head of \geq 250 feet for 1-FP-P-1 and 187 feet for 1-FP-P-2.
 3. Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel, and
 4. Verifying that each high pressure pump starts (sequentially) to maintain the fire suppression water system pressure \geq 80 psig in the main fire loop.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- g. At least once per 3 years by performing a flow test of the system in accordance with Chapter 5, Section 11 of the Fire Protection Handbook, 14th Edition, published by the National Fire Protection Association.

4.7.14.1.2 The fire pump diesel engine shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying:
 - 1. The fuel storage tank contains at least 220 gallons of fuel, and
 - 2. The diesel starts from ambient conditions and operates for at least 30 minutes on recirculation flow.
- b. At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank is within acceptable limits specified in Table 1 of ASTM D975-74 when checked for viscosity, water and sediment.
- c. At least once per 18 months by subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for the class of service. The actions required by ACTION "b" of Specification 3.7.14.1 shall be followed in performing this inspection.

4.7.14.1.3 The fire pump diesel starting 24-volt battery bank and charger shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying that:
 - 1. The electrolyte level of each battery is above the plates, and
 - 2. The overall battery voltage is \geq 24 volts.
- b. At least once per 92 days by verifying that the specific gravity is appropriate for continued service of the battery.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months by verifying that:
 - 1. The batteries and battery racks show no visual indication of physical damage or abnormal deterioration, and
 - 2. The battery-to-battery and terminal connections are clean, tight, free of corrosion and coated with anti-corrosion material.



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

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

DOCKET NO. 50-338

NORTH ANNA POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 88
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 et al., (the licensee) dated March 3, 1988, 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.

2. 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. 88 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance and shall be implemented within 14 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 9, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 88

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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PLANT SYSTEMS

3/4.7.14 FIRE SUPPRESSION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.14.1 The fire suppression water system shall be OPERABLE with:

- a. Two high pressure pumps, each with a capacity of 2500 gpm, with their discharge aligned to the fire suppression header,
- b. Separate water supplies from the North Anna Reservoir and the Service Water Reservoir, and
- c. An OPERABLE flow path capable of taking suction from the North Anna Reservoir and the Service Water Reservoir and transferring the water through distribution piping with OPERABLE sectionalizing control or isolation valves to the yard hydrant curb valves and the valve at each hose standpipe as required to be OPERABLE per Specification 3.7.14.5.

APPLICABILITY: At all times.

ACTION:

- a. With one pump and/or one water supply inoperable, restore the inoperable equipment to OPERABLE status within 7 days or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the plans and procedures to be used to provide for the loss of redundancy in this system. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.
- b. With only the diesel driven fire pump inoperable for performance of the diesel engine inspection required by Specification 4.7.14.1.2.c, establish and demonstrate operability of a backup fire suppression system within 24 hours. If the diesel driven fire pump is not restored to OPERABLE status within 7 days, ACTION "a" applies.
- c. With the fire suppression water system otherwise inoperable:
 1. Establish a backup fire suppression water system within 24 hours, and
 2. Submit a Special Report in accordance with Specification 6.9.2:
 - a) By telephone within 24 hours,
 - b) Confirmed by telegraph, mailgram or facsimile transmission no later than the first working day following the event, and

PLANT SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

- c. In writing within 14 days following the event, outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.7.14.1.1 The fire suppression water system shall be demonstrated OPERABLE:*

- a. By verifying the contained water supply volumes pursuant to Specification 4.7.5.1.
- b. At least once per 31 days on a STAGGERED TEST BASIS by starting each electric motor driven pump and operating it for at least 15 minutes on recirculation flow.
- c. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path is in its correct position.
- d. By performance of a system flush as necessary to maintain the system water chemistry within acceptable limits.
- e. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- f. At least once per 18 months by performing a system functional test which includes simulated automatic actuation of the system throughout its operating sequence, and:
 1. Verifying that each automatic valve in the flow path actuates to its correct position,
 2. Verifying that each pump develops at least 2500 gpm at a system head of greater than or equal to 250 feet for 1-FP-P-1 and greater than or equal to 187 feet for 1-FP-P-2.
 3. Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel, and
 4. Verifying that each high pressure pump starts (sequentially) to maintain the fire suppression water system pressure greater than or equal to 80 psig in the main fire loop.

*The fire suppression system is common to North Anna Unit 1. The surveillances need only be performed once per defined interval to demonstrate operability for both units.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- g. At least once per 3 years by performing a flow test of the system in accordance with Chapter 5, Section 11 of the Fire Protection Handbook, 14th Edition, published by the National Fire Protection Association.

4.7.14.1.2 The fire pump diesel engine shall be demonstrated OPERABLE:*

- a. At least once per 31 days by verifying:
 - 1. The fuel storage tank contains at least 220 gallons of fuel, and
 - 2. The diesel starts from ambient conditions and operates for at least 30 minutes on recirculation flow.
- b. At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank is within acceptable limits specified in Table 1 of ASTM D975-74 when checked for viscosity, water, and sediment.
- c. At least once per 18 months by subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for the class of service. The actions required by ACTION "b" of Specification 3.7.14.1 shall be followed in performing this inspection.

4.7.14.1.3 The fire pump diesel starting 24-volt battery bank and charger shall be demonstrated OPERABLE:*

- a. At least once per 7 days by verifying that:
 - 1. The electrolyte level of each battery is above the plates, and
 - 2. The overall battery voltage is ≥ 24 volts.
- b. At least once per 92 days by verifying that the specific gravity is appropriate for continued service of the battery.

*The fire suppression system is common to North Anna Unit 1. The surveillances need only be performed once per defined interval to demonstrate operability for both units.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months by verifying that:
 - 1. The batteries and battery racks show no visual indication of physical damage or abnormal deterioration, and
 - 2. The battery-to-battery and terminal connections are clean, tight, free of corrosion and coated with anti-corrosion material.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 101 AND 88 TO

FACILITY OPERATING LICENSE NO. NPF-4 AND NPF-7

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

NORTH ANNA POWER STATION, UNITS NO. 1 AND NO. 2

DOCKET NOS. 50-338 AND 50-339

INTRODUCTION

By letter dated March 3, 1988, the Virginia Electric and Power Company (the licensee) requested changes to the North Anna Power Station, Units No. 1 and No. 2 (NA-1&2) Technical Specifications (TS). The proposed changes would revise the Limiting Condition for Operation (LCO) for TS 3/4.7.14 regarding the operation and surveillance requirements for the NA-1&2 diesel-driven fire pump. The proposed changes are specified below:

- a. A new action statement "b" would be added to TS 3.7.14.1 which requires the establishment and demonstration of the operability of the backup fire suppression system when the diesel-driven fire pump is not available for use during the 18-month inspection (TS 4.7.14.1.2.c).
- b. Surveillance requirement 4.7.14.1.2.c would be changed by deleting the phrase "during shutdown," and adding a reference to the new action statement "b" as specified above.
- c. A footnote would be added to surveillance requirements 4.7.14.1.1, 4.7.14.1.2, and 4.7.14.1.3 for Unit 2 which provides clarification that the fire suppression system is common to Unit 1 and therefore the surveillance need only be performed once per defined interval.
- d. Correct a typographical error in action statement "a".

DISCUSSION

The fire suppression system for NA-1&2 includes two high pressure fire water pumps, one motor-driven and the other diesel engine-driven. This suppression system is shared by both units. Currently, TS 4.7.14.1.2.c requires that an inspection of the diesel engine be performed at least once per 18 months, during shutdown, in accordance with procedures prepared in conjunction with the engine manufacturer's recommendations. The proposed changes would continue to require an inspection at least once per 18 months, but would

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eliminate the restriction that the inspection be performed "during shutdown." Instead, the proposed changes would allow the 18-month inspection to be carried out with both units operating, but would require that a backup fire suppression water system be established and demonstrated operable within 24 hours from removing the diesel engine-driven fire pump from service for the purpose of performing this inspection. In the event that the diesel engine is not returned to operable status within 7 days, the proposed change imposes the requirement to submit a Special Report as called for by TS 3.7.14.1 Action "a."

The proposed changes were requested in order to eliminate the ambiguity of the "during shutdown" clause which is not specific as to whether one or both units must be shutdown, and allow flexibility with respect to the timing of the 18-month inspection while retaining the degree of fire suppression system redundancy appropriate for the operational status of the units. Although the 18-month inspection of the fire pump diesel engine will normally be performed during a unit outage, the flexibility afforded by the proposed changes would eliminate the need to (1) extend the surveillance interval beyond that allowed by the TS, or (2) shut down one or both units in the event of unforeseen changes to the outage schedules for both units.

The licensee has interpreted the clause "during shutdown" to mean that only one unit is required to be shutdown during the performance of the 18-month diesel engine inspection. This interpretation was based on the licensee's understanding that the purpose of the shutdown clause was to reduce the safety risk associated with a fire, while the diesel fire pump was unavailable for the NRC-approved fire suppression system design. That is, the increased risk associated with removing the diesel-driven fire pump from service for the purpose of performing a comprehensive inspection was balanced by the decrease in risk associated with having one unit in a shutdown condition. Furthermore, when the diesel-driven fire pump was removed from service for the purpose of performing the 18-month inspection, Action Statement "a" of TS 3.7.14.1 was applied. This Action Statement required that the inoperable equipment (in this case, the diesel-driven fire pump) be restored to operable status within 7 days or that the licensee would submit a Special Report to the NRC within the next 30 days outlining the plans and procedures to be used to provide the loss of redundancy in this system. To date, the 18-month diesel engine inspection has been routinely completed and the fire pump returned to service within 7 days.

With the proposed changes, the increased risk associated with removing the diesel-driven fire pump from service to perform the 18-month inspection while both units are operating would be offset by requiring the restoration of the same degree of redundancy that exists when both the motor- and diesel-driven fire pumps are operable. This would be accomplished by having the motor-driven fire pump and a backup fire suppression system (which includes pumps) operable. Also, a Special Report to the Commission would be required if the diesel-driven fire pump is not restored to operable status within 7 days. The proposed changes would allow the diesel-driven fire pump to be removed from service for the 18-month surveillance only if the motor-driven fire pump is operable. With the diesel-driven pump removed from service for the 18-month inspection, Action Statement "c" of LCO 3.7.14.1 would apply in the event that the motor-driven fire pump became inoperable.

Footnotes are being added to the surveillance requirements for NA-2 Specifications 4.7.14.1.1, 4.7.14.1.2, and 4.7.14.1.3 to clarify that the surveillances need only to be performed once per interval to satisfy both units' surveillance requirements, since the fire suppression system is common to both units. Presently, both units' specifications include the same requirements. Finally, a typographical error is being corrected in Action "a" of 3.7.14.1 for both units.

EVALUATION

As discussed above, the proposed changes will maintain an equivalent balance of risk associated with removing the diesel-driven fire pump from service that is maintained by the current NA-1&2 TS. Therefore, the consequences of previously evaluated accidents will remain unchanged since the proposed changes will result in an equivalent degree of fire suppression system capability as is currently required by the NA-1&2 TS. In addition, the proposed changes establish a degree of fire suppression system redundancy and therefore, capability for the operational status of NA-1&2 during the periods when the diesel-driven fire pump is removed from service for a specific inspection. Finally, the current margin of safety (as defined by the current TS requirements) is to have at least one unit shutdown and an electric motor-driven fire pump operable while performing the 18-month fire pump diesel engine inspection. The staff finds that the proposed changes would maintain an equivalent margin of safety with both units operable and by requiring that both the motor-driven fire pump and the backup fire suppression system be in an operable status whenever the 18-month diesel engine inspection is performed. Therefore, the staff finds the proposed changes do not involve any significant reduction in the margin of nuclear safety associated with a fire at NA-1&2. Therefore, based on all of the above, the staff finds the proposed changes to be acceptable.

ENVIRONMENTAL CONSIDERATION

These amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes to a surveillance requirement. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously published a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(9). Pursuant to 10 CFR §51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

CONCLUSION

The staff has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) 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.

Date: May 9, 1988

Principal Contributor:

Leon Engle