May 30, 1991

Docket Nos. 50-338
and 50-339

DISTRIBUTION
See attached sheet

Mr. W. L. Stewart
Senior Vice President - Nuclear
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

Dear Mr. Stewart:

SUBJECT: NORTH ANNA UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: VISUAL SNUBBER INSPECTION PROGRAM (TAC NOS. 80252 AND 80253)

The Commission has issued the enclosed Amendment Nos.144 and 128 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 January 31, 1991. The amendments are effective as of the above date of issuance and shall be implemented within 30 days.

These amendments revise the NA-1&2 TS for the visual snubber inspection program and are consistent with the guidance of the NRC Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990.

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. 144 to NPF-4
2. Amendment No. 128 to NPF-7
3. Safety Evaluation

cc w/enclosures:
See next page

CP-1

OFC	LA:PDII-2	PM:PDII-2	D:PDII-2	OGC	EMEB:NRR	EMEB:NRR
NAME	DMiller	LEngle:kdj	HBerkow		HShaw	JNorberg
DATE	5/13/91	5/13/91	5/14/91	5/16/91	5/13/91	5/13/91

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Document Name: NA 80252/3

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cc:
Mr. William C. Porter, Jr.
County Administrator
Louisa County
P.O. Box 160
Louisa, Virginia 23093

Michael W. Maupin, Esq.
Hunton and Williams
P. O. Box 1535
Richmond, Virginia 23212

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

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

Mr. E. Wayne Harrell
Vice President - Nuclear Operations
Virginia Electric and Power Co.
5000 Dominion Blvd.
Glen Allen, Virginia 23060

Mr. Patrick A. O'Hare
Office of the Attorney General
Supreme Court Building
101 North 8th Street
Richmond, Virginia 23219

Senior Resident Inspector
North Anna Power Station
U.S. Nuclear Regulatory Commission
Route 2, Box 78
Mineral, Virginia 23117

C. M. G. Buttery, M.D., M.P.H.
State Health Commissioner
Office of the Commissioner
Virginia Department of Health
P.O. Box 2448
Richmond, Virginia 23218

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30323

Mr. G. E. Kane, Manager
North Anna Power Station
P.O. Box 402
Mineral, Virginia 23117

Mr. J. P. O'Hanlon
Vice President - Nuclear Services
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

Mr. Martin Bowling
Manager - Nuclear Licensing
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

DATED: May 30, 1991

AMENDMENT NO.144 TO FACILITY OPERATING LICENSE NO. NPF-4-NORTH ANNA UNIT 1
AMENDMENT NO.128 TO FACILITY OPERATING LICENSE NO. NPF-7-NORTH ANNA UNIT 2

Docket File
NRC & Local PDRs
PDII-2 Reading
S. Varga, 14/E/4
G. Lainas, 14/H/3
H. Berkow
D. Miller
L. Engle
OGC-WF
D. Hagan, 3302 MNBB
E. Jordan, 3302 MNBB
B. Grimes, 9/A/2
G. Hill (6), P-137
Wanda Jones, P-130A
C. Grimes, 11/F/23
J. Raliegh, 14-F-14
H. Shaw, 7-E-23
J. Norberg, 7-D-2
ACRS (10)
GPA/PA
OC/LFMB
M. Sinkule, R-II
Others as required

cc: Plant Service list

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. 144
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 January 31, 1991, 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. 144 , 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 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Herbert N. Berkow

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 30, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 144

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
3/4 7-28
3/4 7-28a (new)
3/4 7-28b (new)
3/4 7-29

LIMITING CONDITION FOR OPERATION

3.7.9.2 As a minimum, one residual heat removal subsystem shall be OPERABLE.

APPLICABILITY: MODES 4 and 5.

ACTION:

With no Residual Heat Removal subsystem OPERABLE, immediately restore at least one RHR subsystem to OPERABLE status or maintain the Reactor Coolant System T_{avg} less than 350°F by use of alternate heat removal methods. The provisions of Specifications 3.0.3, 3.0.4 and 4.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.9.2 Each Residual Heat Removal subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirement of Specification 4.7.9.1, and

a. At least once per 31 days by;

   1. Cycling each testable, remote or automatically operated valve through at least one complete cycle, and

   2. Verifying the correct position of each manual valve not locked sealed or otherwise secured in position, and

   3. Verifying the correct position of each remote or automatically operated valve.

3/4.7.10 SNUBBERS

LIMITING CONDITIONS FOR OPERATION

3.7.10 All snubbers utilized on safety related systems shall be OPERABLE. For those snubbers utilized on non-safety related systems, each snubber shall be OPERABLE if a failure of that snubber or the failure of the non-safety related system would have an adverse effect on any safety related system.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION: With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.10.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.10 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

NOTE: As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

a. Visual Inspection

Snubbers are categorized as accessible or inaccessible during reactor operation. Each of the categories (accessible and inaccessible) may be inspected independently according to the schedule determined by the following table and the visual inspection interval for each type of snubber shall be determined based upon the criteria provided in that table.

4.7.10.a (continued)

SNUBBER VISUAL INSPECTION INTERVAL

	NUMBER OF UNACCEPTABLE SNUBBERS		
Population or Category (Notes 1 and 2)	Column A Extend Interval (Notes 3 and 4)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or more	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers are categorized, based on their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must decide upon that categorization and document that decision before any inspection and shall use that decision as the basis for determining the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. If the results of the interpolation is a fractional value, round off the results to the next lower integer to establish the applicable number of unacceptable snubbers for each column.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

4.7.10.a (continued)

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional, and (4) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up.

Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers, irrespective of type, that may be generically susceptible, and (2) the affected snubber shall be functionally tested in the as found condition and determined OPERABLE per Specification 4.7.10.d and 4.7.10.e.

4.7.10.b (continued)

All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next visual inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

When hydraulic snubbers which have uncovered fluid ports are tested for operability, the test shall be performed by starting with the piston at the as-found setting and extending the piston rod in the tension mode direction. Snubbers which have been determined to be inoperable as a result of unexpected transients, isolated damage, or other random events, and cannot be proven operable by functional testing for the same reasons, shall not be counted in determining the next visual inspection period when the provision in 4.7.10.c that failures are subject to an engineering evaluation of component structural integrity has been met and equipment has been restored to an operable state via repair and/or replacement as necessary.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample of small bore snubbers which follows the expression 35[1+c/2], where c=2 is the allowable number of small bore snubbers not meeting the acceptance criteria selected by the operator, shall be functionally tested either in-place or in a bench test. For each number of small bore snubbers above "c" which does not meet the functional test acceptance criteria for Specification 4.7.10.d or 4.7.10.e, an additional sample selected according to the expression $35(1+c/2)(2/(c+1))^2(a-c)$ shall be functionally tested, where "a" is a total number of small bore snubbers found inoperable during the functional testing of the representative sample.

Functional testing shall continue according to the expression $b[35(1+c/2)(2/(c+1))^2]$ where "b" is the number of snubbers found inoperable in the previous re-sample, until no additional inoperable snubbers are found within a sample or until all small bore snubbers have been functionally tested.

SURVEILLANCE REQUIREMENTS (Continued)

At least once per 18 months during shutdown, 10% of the large bore snubbers (snubbers greater than 50 kips) shall be functionally tested either in place, in a full snubber bench test, or in a snubber valve block bench test. For each large bore snubber that does not meet the functional test acceptance criteria of Specification 4.7.10.d, an engineering evaluation is required to determine the failure mode. If the failure is determined to be generic, an additional 10% of that type of snubber shall be functionally tested. If the failure is determined to be non-generic, an additional 10% of that type of snubber will be tested during the next functional test period.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle.

2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.).

3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers that are "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative samples.* Accessible and inaccessible snubbers may be used jointly or separately as the basis for the sampling plan.

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

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. 128
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 January 31, 1991, 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. 128 , 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 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Herbert N. Berkow

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 30, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 128

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.

Page
3/4 7-25
3/4 7-25a (new)
3/4 7-25b (new)
3/4 7-26

3/4.7.10 SNUBBERS

LIMITING CONDITIONS FOR OPERATION

3.7.10 All snubbers utilized on safety related systems shall be OPERABLE. For those snubbers utilized on non-safety related systems, each snubber shall be OPERABLE if a failure of that snubber or the failure of the non-safety related system would have an adverse effect on any safety related system.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION: With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.10.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.10 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

NOTE: As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

a. Visual Inspection

Snubbers are categorized as accessible or inaccessible during reactor operation. Each of the categories (accessible and inaccessible) may be inspected independently according to the schedule determined by the following table and the visual inspection interval for each type of snubber shall be determined based upon the criteria provided in that table.

4.7.10.a (continued)

SNUBBER VISUAL INSPECTION INTERVAL

	NUMBER OF UNACCEPTABLE SNUBBERS		
Population or Category (Notes 1 and 2)	Column A Extend Interval (Notes 3 and 4)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or more	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers are categorized, based on their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must decide upon that categorization and document that decision before any inspection and shall use that decision as the basis for determining the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. If the results of the interpolation is a fractional value, round off the results to the next lower integer to establish the applicable number of unacceptable snubbers for each column.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

SURVEILLANCE REQUIREMENTS (Continued)

4.7.10.a (continued)

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional, and (4) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up.

Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers, irrespective of type, that may be generically susceptible, and (2) the affected snubber shall be functionally tested in the as found condition and determined OPERABLE per Specification 4.7.10.d and 4.7.10.e.

SURVEILLANCE REQUIREMENTS (Continued)

4.7.10.b (continued)

All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next visual inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

When hydraulic snubbers which have uncovered fluid ports are tested for operability, the test shall be performed by starting with the piston at the as-found setting and extending the piston rod in the tension mode direction. Snubbers which have been determined to be inoperable as a result of unexpected transients, isolated damage, or other random events, and cannot be proven operable by functional testing for the same reasons, shall not be counted in determining the next visual inspection period when the provision in 4.7.10.c that failures are subject to an engineering evaluation of component structural integrity has been met and equipment has been restored to an operable state via repair and/or replacement as necessary.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample of small bore snubbers which follows the expression 35[1+c/2], where c=2 is the allowable number of small bore snubbers not meeting the acceptance criteria selected by the operator, shall be functionally tested either in-place or in a bench test. For each number of small bore snubbers above "c" which does not meet the functional test acceptance criteria for Specification 4.7.10.d or 4.7.10.e, an additional sample selected according to the expression $35(1+c/2)(2/(c+1))^2(a-c)$ shall be functionally tested, where "a" is a total number of small bore snubbers found inoperable during the functional testing of the representative sample.

Functional testing shall continue according to the expression $b[35(1+c/2)(2/(c+1))^2]$ where "b" is the number of snubbers found inoperable in the previous re-sample, until no additional inoperable snubbers are found within a sample or until all small bore snubbers have been functionally tested.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 144 AND 128 TO

FACILITY OPERATING LICENSE NOS. 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

1.0 INTRODUCTION

By letter dated January 31, 1991, the Virginia Electric and Power Company (the licensee) proposed a change to the Technical Specifications (TS) for the North Anna Power Station, Units No. 1 and No. 2 (NA-1&2). The proposed change would modify the visual snubber inspection program consistent with the guidance of NRC Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990.

2.0 DISCUSSION

In GL 90-09, the NRC identified that the existing TS specify a schedule for visual inspections of snubbers that is based on the number of inoperable snubbers found during the previous visual inspection and does not take into consideration the size of the snubber population.

The purpose of the visual inspection is the observation of the condition of installed snubbers to identify those that are damaged, degraded, or inoperable as caused by physical means, leakage, corrosion or environmental exposure. Functional testing is performed to assure that there is a 95% confidence level that 90% to 100% of the snubbers will operate within their specified performance limits. The visual inspection complements the functional testing and provides additional confidence in snubber operability.

Performing these inspections at the frequency determined by the existing TS requires a significant amount of resources and unnecessary radiological exposure. The same level of confidence in reliability can be obtained with a longer inspection interval by a proper grouping and statistical sampling program for the visual inspection of the snubbers.

The NRC has developed an alternate inspection schedule for visual inspections that maintains that confidence level and will generally allow the inspection during plant outages, reduce occupational radiation exposure and is consistent

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with the Commission's policy statement on TS Improvements. This new method for determining the snubber visual inspection intervals is based on the number of unacceptable snubbers found during the previous inspection, the total population or category size for each snubber type, and the previous inspection interval.

The licensee is proposing to incorporate the guidance and requirements of GL 90-09 for visual inspection of snubbers in the NA-1&2 TS. The wording of the proposed changes was derived from the model TS changes provided in Enclosure B of GL 90-09.

The GL lists three acceptance criteria for visual inspections. They are: (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. The licensee has chosen to retain an additional fourth acceptance criterion, which currently exists in the NA-1&2 TS, to require "in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up."

NA-1&2 completed the most recent refueling outages in March 1991 and November 1990, respectively. The snubber visual inspections conducted during the outages had established snubber groupings that were consistent with the requirements of the proposed TS. The inspections yielded no unacceptable snubbers for either unit. Because of these facts, the licensee requested that the criteria contained in the proposed TS be applied to the results of the recently completed inspections for determination of the surveillance intervals for the next inspections.

3.0 EVALUATION

The proposed change provides a visual inspection program consistent with the guidance of NRC GL 90-90, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990. Also, because a relatively short period of time has elapsed since the completion of the visual inspections and the results of the inspections, the staff finds it acceptable to apply the proposed TS criteria to the NA-1&2 inspection results in order to re-determine the surveillance intervals for the next visual inspections.

As there were no unacceptable snubbers found during the inspections, this will not result in extending a surveillance interval which otherwise would have been reduced and will achieve one of the principal goals of the issuance of GL 90-09, which is to reduce occupational radiological exposures while insuring the reliability of the safety-related snubbers.

Therefore, based on all of the above, the staff finds the proposed TS changes to be acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Virginia State official was notified of the proposed issuance of the amendments. The State official had no comment.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments change surveillance requirements. The NRC 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 issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding (56 FR 9388). Accordingly, these 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 these amendments.

5.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Leon B. Engle

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