November 22, 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: CONTROL ROD INSERTION LIMITS (TAC NOS. 74356 AND 74357)

The Commission has issued the enclosed Amendment Nos. 149 and 133 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 August 11, 1989.

The amendments incorporate changes in the NA-1&2 TS which govern control rod insertion limits. The changes allow greater operational flexibility with respect to control rod bank positioning as a means of minimizing localized rod control cluster assembly wear. Your requested changes to page 3/4 1-24 and 3/4 1-26 for NA-1, and 3/4 1-22 and 3/4 1-24 for NA-2 are no longer needed due to the issuance of Amendment Nos. 146 and 130, and therefore these changes are not included.

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,

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

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PDR ADOCK 05000338
P PDR

Enclosures:
1. Amendment No. 149 to NPF-4
2. Amendment No. 133 to NPF-7
3. Safety Evaluation

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cc w/enclosures:
See next page

SRXB
Phillips
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|---|---|---|---|---|---|
| NAME | :D. Miller | :L. Engle | :H. Berkow | :MZobler | :RJones |
| DATE | :11/14/91 | :11/14/91 | :11/18/91 | :11/19/91 | :11/14/91 |

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Virginia Electric & Power Company

North Anna Power Station
Units 1 and 2

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DATED: November 22, 1991

AMENDMENT NO. 149 TO FACILITY OPERATING LICENSE NO. NPF-4-NORTH ANNA UNIT 1
AMENDMENT NO. 133 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
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OGC-WF
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

DOCKET NO. 50-338

NORTH ANNA POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 149
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 August 11, 1989, 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. 149 , 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: November 22, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 149

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 |
|---|
| ~~1-3~~ |
| 1-5 |
| B 2-2 |
| 3/4 1-23 |
| 3/4 10-1 |
| B 3/4 1-4 |

ENGINEERED SAFETY FEATURE RESPONSE TIME

1.12 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

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

FULLY WITHDRAWN

1.13a The control bank FULLY WITHDRAWN position shall be within the interval of 225 to 229 steps withdrawn, inclusive. Definition of the FULLY WITHDRAWN position for each specific cycle shall be documented in the rod insertion limit operator curve.

GASEOUS RADWASTE TREATMENT SYSTEM

1.14 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

1.15 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

1.16 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 not include non-employees such as vending machine servicemen or postman 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

1.17 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Semi-annual Radioactive Effluent Release Reports required by Specifications 6.9.1.8 and 6.9.1.9.

OPERABLE - OPERABILITY

1.18 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

1.19 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

1.20 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

1.21 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

1.22 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, 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 Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of the radioactive waste.

PURGE - PURGING

1.23 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.

QUADRANT POWER TILT RATIO

1.24 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

1.25 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 2893 MWt.

REACTOR TRIP SYSTEM RESPONSE TIME

1.26 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 EVENT

1.27 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

SHUTDOWN MARGIN

1.28 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

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

SLAVE RELAY TEST

1.30 A SLAVE RELAY TEST shall be the energization of each slave relay and verification of OPERABILITY of each relay. The SLAVE RELAY TEST shall include a continuity check, as a minimum, of associated testable actuation devices.

SOURCE CHECK

1.31 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

1.32 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

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

UNIDENTIFIED LEAKAGE

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

UNRESTRICTED AREA

1.35 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

1.36 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

1.37 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.

## 2.1.1 REACTOR CORE

The restrictions of this safety limit prevent overheating of the fuel and possible cladding perforation which would result in the release of fission products to the reactor coolant. Overheating of the fuel cladding is prevented by restricting fuel operation to within the nucleate boiling regime where the heat transfer coefficient is large and the cladding surface temperature is slightly above the coolant saturation temperature.

Operation above the upper boundary of the nucleate boiling regime could result in excessive cladding temperatures because of the onset of departure from nucleate boiling (DNB) and the resultant sharp reduction in heat transfer coefficient. DNB is not a directly measurable parameter during operation and therefore THERMAL POWER and Reactor Coolant Temperature and Pressure have been related to DNB through a correlation. The DNB correlation has been developed to predict the DNB flux and the location of DNB for axially uniform and non-uniform heat flux distributions. The local DNB heat flux ratio, DNBR, defined as the ratio of the heat flux that would cause DNB at a particular core location to the local heat flux, is indicative of the margin to DNB.

The DNB design basis is as follows: there must be at least a 95 percent probability that the minimum DNBR of the limiting rod during Condition I and II events is greater than or equal to the DNBR limit of the DNB correlation being used (the WRB-1 correlation in this application). The correlation DNBR limit is established based on the entire applicable experimental data set such that there is a 95 percent probability with 95 percent confidence that DNB will not occur when the minimum DNBR is at the DNBR limit.

In meeting this design basis, uncertainties in plant operating parameters, nuclear and thermal parameters, and fuel fabrication parameters are considered statistically such that there is at least a 95% probability that the minimum DNBR for the limiting rod is greater than or equal to the DNBR limit. The uncertainties in the above plant parameters are used to determine the plant DNBR uncertainty. This DNBR uncertainty, combined with the correlation DNBR limit, establishes a design DNBR value which must be met in plant safety analyses using values of input parameters without uncertainties. As an additional criterion, meeting the DNBR limit also ensures that a least 99.9% of the core avoids the onset of DNB when the plant is at the DNBR limit.

The curves of Figures 2.1-1, 2.1-2, and 2.1-3 show the loci of points of THERMAL POWER, Reactor Coolant System pressure and average temperature for which the minimum DNBR is no less than the design limit DNBR, or the average enthalpy at the vessel exit is equal to the enthalpy of saturated liquid.

The curves are based on an enthalpy hot channel factor, $F^N_{\Delta H}$, of 1.49 and a reference cosine with a peak of 1.55 for axial power shape. An allowance is included for an increase in $F^N_{\Delta H}$ at reduced power based on the expression:

$$F^N_{\Delta H} = 1.49\ [1 + 0.3\ (1-P)]$$

where P is the fraction of RATED THERMAL POWER

These limiting heat flux conditions are higher than those calculated for the range of all control rods FULLY WITHDRAWN to the maximum allowable control rod insertion assuming the axial power imbalance is within the limits of the f(ΔI) function of the Overtemperature trip. When the axial power imbalance is not within the tolerance, the axial power imbalance effect on the Overtemperature ΔT trips will reduce the setpoints to provide protection consistent with core safety limits.

## 2.1.2 REACTOR COOLANT SYSTEM PRESSURE

The restriction of this Safety Limit protects the integrity of the Reactor Coolant System from overpressurization and thereby prevents the release of radionuclides contained in the reactor coolant from reaching the containment atmosphere.

The reactor pressure vessel and pressurizer are designed to Section III of the ASME Code for Nuclear Power Plant which permits a maximum transient pressure of 110% (2735 psig) of design pressure. The Reactor Coolant System piping, valves and fittings, were initially designed to ANSI B 31.1 1967 Edition and ANSI B 31.7 1969 Edition (Table 5.2.1-1 of FSAR) which permits a maximum transient pressure of 120% (2985 psig) of component design pressure. The Safety Limit of 2735 psig is therefore consistent with the design criteria and associated code requirements.

The entire Reactor Coolant System is hydrotested at 3107 psig, 125% of design pressure, to demonstrate integrity prior to initial operation.

## ROD DROP TIME

### LIMITING CONDITION FOR OPERATION

3.1.3.4 The individual full length (shutdown and control) rod drop time from the 229 STEP withdrawn position shall be $\leq$ 2.7 seconds from beginning of decay of stationary gripper coil voltage to dashpot entry with:

a. $T_{avg} \geq 500°F$, and

b. All reactor coolant pumps operating.

APPLICABILITY: MODES 1 and 2.

ACTION:

a. With the drop time of any full length rod determined to exceed the above limit, restore the rod drop time to within the above limit prior to proceeding to MODE 1 or 2.

b. With the rod drop times within limits but determined with 2 reactor coolant pumps operating, operation may proceed provided THERMAL POWER is restricted to:

   1. $\leq$ 66% of RATED THERMAL POWER when the reactor coolant stop valves in the nonoperating loop are open, or

   2. $\leq$ 71% of RATED THERMAL POWER when the reactor coolant stop valves in the nonoperating loop are closed.

### SURVEILLANCE REQUIREMENTS

4.1.3.4 The rod drop time of full length rods shall be demonstrated through measurement prior to reactor criticality:

a. For all rods following each removal of the reactor vessel head,

b. For specifically affected individual rods following any maintenance on or modification to the control rod drive system which could affect the drop time of those specific rods, and

c. At least once per 18 months.

## SHUTDOWN ROD INSERTION LIMIT

### LIMITING CONDITION FOR OPERATION

3.1.3.5 All shutdown rods shall be limited in physical insertion as specified in the CORE OPERATING LIMITS REPORT.

APPLICABILITY: MODES 1* and 2*#

ACTION:

With a maximum of one shutdown rod inserted beyond the insertion limit specified in the CORE OPERATING LIMITS REPORT, except for surveillance testing pursuant to Specification 4.1.3.1.2, within one hour either:

a. Restore the rod to within the insertion limit specified in the CORE OPERATING LIMITS REPORT, or

b. Declare the rod to be inoperable and apply Specification 3.1.3.1

### SURVEILLANCE REQUIREMENTS

4.1.3.5 Each shutdown rod shall be determined to be within the insertion limit specified in the CORE OPERATING LIMITS REPORT

a. Within 15 minutes prior to initial control rod bank withdrawal during an approach to reactor criticality, and

b. At least once per 12 hours thereafter.

*See Special Test Exceptions 3.10.2 and 3.10.3.
#With $K_{eff} \geq 1.0$

## 3/4.10 SPECIAL TEST EXCEPTIONS

### SHUTDOWN MARGIN

### LIMITING CONDITION FOR OPERATION

3.10.1 The SHUTDOWN MARGIN requirement of Specification 3.1.1.1 may be suspended for measurement of control rod worth and SHUTDOWN MARGIN provided the reactivity equivalent to at least the highest estimated control rod worth is available for trip insertion from OPERABLE control rod(s).

APPLICABILITY: MODE 2.

ACTION:

a. With any full length control rod not fully inserted and with less than the above reactivity equivalent available for trip insertion, initiate and continue boration at ≥ 10 gpm of at least 12,950 ppm boric acid solution or its equivalent until the SHUTDOWN MARGIN required by Specification 3.1.1.1 is restored.

b. With all full length control rods inserted and the reactor subcritical by less than the above reactivity equivalent, immediately initiate and continue boration at ≥ 10 gpm of at least 12,950 ppm boric acid solution or its equivalent until the SHUTDOWN MARGIN required by Specification 3.1.1.1 is restored.

### SURVEILLANCE REQUIREMENTS

4.10.1.1 The position of each full length rod either partially or FULLY WITHDRAWN shall be determined at least once per 2 hours.

4.10.1.2 Each full length rod that is not fully inserted shall be demonstrated capable of full insertion when tripped from at least 50% withdrawn position within 24 hours prior to reducing the SHUTDOWN MARGIN to less than the limits of Specification 3.1.1.1.

## SPECIAL TEST EXCEPTIONS

## GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS

### LIMITING CONDITION FOR OPERATION

3.10.2 The group height, insertion and power distribution limits of Specifications 3.1.3.1, 3.1.3.5, 3.1.3.6, and 3.2.4 may be suspended during the performance of PHYSICS TESTS provided:

a. The THERMAL POWER is maintained ≤ 85% of RATED THERMAL POWER, and

b. The limits of Specifications 3.2.2 and 3.2.3 are maintained and determined at the frequencies specified in Specification 4.10.2.2 below.

APPLICABILITY: MODE 1.

ACTION:

With any of the limits of Specifications 3.2.2 or 3.2.3 being exceeded while the requirements of Specifications 3.1.3.1, 3.1.3.5, 3.1.3.6, and 3.2.4 are suspended, either:

a. Reduce THERMAL POWER sufficient to satisfy the ACTION requirements of Specifications 3.2.2 and 3.2.3, or

b. Be in HOT STANDBY within 6 hours.

### SURVEILLANCE REQUIREMENTS

4.10.2.1 The THERMAL POWER shall be determined to be ≤ 85% of RATED THERMAL POWER at least once per hour during PHYSICS TESTS.

4.10.2.2 The Surveillance Requirements of Specifications 4.2.2 and 4.2.3 shall be performed at the following frequencies during PHYSICS TESTS:

a. Specification 4.2.2 - At least once per 12 hours.

b. Specification 4.2.3 - At least once per 12 hours.

3/4.1.2 BORATION SYSTEMS (Continued)

With the RCS average temperature above 200°F, a minimum of two separate and redundant boron injection systems are provided to ensure single functional capability in the event an assumed failure renders one of the systems inoperable. Allowable out-of-service periods ensure that minor component repair or corrective action may be completed without undue risk to overall facility safety from injection system failures during the repair period.

The boration capabioity of either system is sufficient to provide a SHUTDOWN MARGIN from expected operating conditions of 1.77% Δk/k after xenon decay and cooldown to 200°F. This expected boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires 6,000 gallons of 12,950 ppm borated water from the boric acid storage tanks or 54,200 gallons of 2300 ppm borated water from the refueling water storage tank.

The limitation for a maximum of one centrifugal charging pump to be OPERABLE and the Surveillance Requirement to verify all charging pumps except the required OPERABLE pump to be inoperable below 324°F provides assurance that a mass addition pressure transient can be relieved by the operation of a single PORV.

With the RCS temperature below 200°F, one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity change in the event the single injection system becomes inoperable.

The boron capability required below 200°F is sufficient to provide a SHUTDOWN MARGIN of 1.77% Δk/k after xenon decay and cooldown from 200°F to 140°F. This condition requires either 1378 gallons of 12,950 ppm borated water from the boric acid storage tanks or 3400 gallons of 2300 ppm borated water from the refueling water storage tank.

The contained water volume limits include allowance for water not available because of discharge line location and other physical characteristics. The OPERABILITY of one boron injection system during REFUELING insures that this system is available for reactivity control while in MODE 6.

3/4.1.2 BORATION SYSTEMS (Continued)

The limits on contained water volume and boron concentration of the RWST ensure a pH value of between 7.7 and 9.0 for the solution recirculated within the containment after a LOCA. This pH minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components.

At least one charging pump must remain operable at all times when the opposite unit is in MODE 1, 2, 3, or 4. This is required to maintain the charging pump cross-connect system operational.

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

The specifications of this section (1) ensure that acceptable power distribution limits are maintained, (2) ensure that the minimum SHUTDOWN MARGIN is maintained, and (3) limit the potential effects of rod misalignment on associated accident analyses. OPERABILITY of the movable control assemblies is established by observing rod motion and determining that rods are positioned within ± 12 steps (indicated position) of the respective demand step counter position. The OPERABILITY of the individual rod position indication system is established by appropriate periodic CHANNEL CHECKS, CHANNEL FUNCTIONAL TESTS, and CHANNEL CALIBRATIONS. OPERABILITY of the individual rod position indicators is required to determine control rod position and thereby ensure compliance with the control rod alignment and insertion limits. The OPERABLE condition for the individual rod position indicators is defined as being capable of indicating rod position within ± 12 steps of the associated demand position indicator. For power levels below 50 percent of RATED THERMAL POWER, the specifications of this section permit a maximum one hour in every 24 stabilization period (thermal "soak time") to allow stabilization of known thermal drift in the individual rod position indicator channels during which time the indicated rod position may vary from demand position indication by no more than ± 24 steps. This "1 in 24" feature is an upper limit on the frequency of thermal soak allowances and is available both for a continuous one hour period or one consisting of several discrete intervals. During this stabilization period, greater reliance is placed upon the demand position indicators to determine rod position. In addition, the ± 24 step/hour limit is not applicable when the control rod position is known to be greater than 12 steps from the rod group step counter demand position indication. Above 50 percent of RATED THERMAL POWER, rod motion is not expected to induce thermal transients of sufficient magnitude to exceed the individual rod position indicator instrument accuracy of ± 12 steps. Comparison of the demand position indicators to the bank insertion limits with verification of rod position by the individual rod position indicators (after thermal soak following rod motion below 50 percent of RATED THERMAL POWER) is sufficient verification that the control rods are above the insertion limits.

The control bank FULLY WITHDRAWN position can be varied within the interval of 225 to 229 steps withdrawn, inclusive. This interval permits periodic repositioning of the parked RCCAs to minimize wear, while having minimal impact on the normal reload core physics and safety evaluations. Changes of the RCCA FULLY WITHDRAWN position within this band are administratively controlled, using the rod insertion limit operator curve.

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. 133
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 August 11, 1989, 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. 133 , 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: November 22, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 133

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.

| Page |
|---|
| 1-3 |
| 1-5 |
| B 2-2 |
| 3/4 1-21 |
| 3/4 10-1 |
| B 3/4 1-4 |

ENGINEERED SAFETY FEATURE RESPONSE TIME

1.12 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

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

FULLY WITHDRAWN

1.13a The control bank FULLY WITHDRAWN position shall be within the interval of 225 to 229 steps withdrawn, inclusive. Definition of the FULLY WITHDRAWN position for each specific cycle shall be documented in the rod insertion limit operator curve.

GASEOUS RADWASTE TREATMENT SYSTEM

1.14 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

1.15 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

1.16 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 not include non-employees such as vending machine servicemen or postman 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

1.17 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Semi-annual Radioactive Effluent Release Reports required by Specifications 6.9.1.8 and 6.9.1.9.

OPERABLE - OPERABILITY

1.18 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

1.19 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

1.20 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

1.21 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

1.22 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, 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 Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of the radioactive waste.

PURGE - PURGING

1.23 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.

QUADRANT POWER TILT RATIO

1.24 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

1.25 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 2893 MWt.

REACTOR TRIP SYSTEM RESPONSE TIME

1.26 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 EVENT

1.27 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

SHUTDOWN MARGIN

1.28 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

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

SLAVE RELAY TEST

1.30 A SLAVE RELAY TEST shall be the energization of each slave relay and verification of OPERABILITY of each relay. The SLAVE RELAY TEST shall include a continuity check, as a minimum, of associated testable actuation devices.

SOURCE CHECK

1.31 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

1.32 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

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

UNIDENTIFIED LEAKAGE

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

UNRESTRICTED AREA

1.35 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

1.36 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

1.37 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.

## 2.1 SAFETY LIMITS

BASES

### 2.1.1 REACTOR CORE

The restrictions of this safety limit prevent overheating of the fuel and possible cladding perforation which would result in the release of fission products to the reactor coolant. Overheating of the fuel cladding is prevented by restricting fuel operation to within the nucleate boiling regime where the heat transfer coefficient is large and the cladding surface temperature is slightly above the coolant saturation temperature.

Operation above the upper boundary of the nucleate boiling regime could result in excessive cladding temperatures because of the onset of departure from nucleate boiling (DNB) and the resultant sharp reduction in heat transfer coefficient. DNB is not a directly measurable parameter during operation and therefore THERMAL POWER and Reactor Coolant Temperature and Pressure have been related to DNB through a correlation. The DNB correlation has been developed to predict the DNB flux and the location of DNB for axially uniform and non-uniform heat flux distributions. The local DNB heat flux ratio, DNBR, defined as the ratio of the heat flux that would cause DNB at a particular core location to the local heat flux, is indicative of the margin to DNB.

The DNB design basis is as follows: there must be at least a 95 percent probability that the minimum DNBR of the limiting rod during Condition I and II events is greater than or equal to the DNBR limit of the DNB correlation being used (the WRB-1 correlation in this application). The correlation DNBR limit is established based on the entire applicable experimental data set such that there is a 95 percent probability with 95 percent confidence that DNB will not occur when the minimum DNBR is at the DNBR limit.

In meeting this design basis, uncertainties in plant operating parameters, nuclear and thermal parameters, and fuel fabrication parameters are considered statistically such that there is at least a 95% probability that the minimum DNBR for the limiting rod is greater than or equal to the DNBR limit. The uncertainties in the above plant parameters are used to determine the plant DNBR uncertainty. This DNBR uncertainty, combined with the correlation DNBR limit, establishes a design DNBR value which must be met in plant safety analyses using values of input parameters without uncertainties. As an additional criterion, meeting the DNBR limit also ensures that at least 99.9% of the core avoids the onset of DNB when the plant is at the DNBR limit.

The curves of Figures 2.1-1, 2.1-2, and 2.1-3 show the loci of points of THERMAL POWER, Reactor Coolant System pressure and average temperature for which the minimum DNBR is no less than the design limit DNBR, or the average enthalpy at the vessel exit is equal to the enthalpy of saturated liquid.

The curves are based on an enthalpy hot channel factor, $F^N_{\Delta H}$, of 1.49 and a reference cosine with a peak of 1.55 for axial power shape. An allowance is included for an increase in $F^N_{\Delta H}$ at reduced power based on the expression:

$$F^N_{\Delta H} = 1.49\ [1+0.3\ (1-P)]$$

where P is the fraction of RATED THERMAL POWER

These limiting heat flux conditions are higher than those calculated for the range of all control rods FULLY WITHDRAWN to the maximum allowable control rod insertion assuming the axial power imbalance is within the limits of the f(delta I) function of the Overtemperature trip. When the axial power imbalance is not within the tolerance, the axial power imbalance effect on the Overtemperature ΔT trips will reduce the setpoints to provide protection consistent with core safety limits.

## 2.1.2 REACTOR COOLANT SYSTEM PRESSURE

The restriction of this Safety Limit protects the integrity of the Reactor Coolant System from overpressurization and thereby prevents the release of radionuclides contained in the reactor coolant from reaching the containment atmosphere.

The reactor pressure vessel and pressurizer are designed to Section III of the ASME Code for Nuclear Power Plant which permits a maximum transient pressure of 110% (2735 psig) of design pressure. The Reactor Coolant System piping, valves and fittings, were initially designed to ANSI B 31.1 1967 Edition and ANSI B 31.7 1969 Edition (Table 5.2.1-1 of FSAR) which permits a maximum transient pressure of 120% (2985 psig) of component design pressure. The Safety Limit of 2735 psig is therefore consistent with the design criteria and associated code requirements.

The entire Reactor Coolant System is hydrotested at 3107 psig, 125% of design pressure, to demonstrate integrity prior to initial operation.

## ROD DROP TIME

### LIMITING CONDITION FOR OPERATION

3.1.3.4 The individual full length (shutdown and control) rod drop time from the 229 STEP withdrawn position shall be less than or equal to 2.7 seconds from beginning of decay of stationary gripper coil voltage to dashpot entry with:

a. $T_{avg}$ greater than or equal to 500°F, and

b. All reactor coolant pumps operating.

APPLICABILITY: MODES 1 and 2.

ACTION:

a. With the drop time of any full length rod determined to exceed the above limit, restore the rod drop time to within the above limit prior to proceeding to MODE 1 or 2.

b. With the rod drop times within limits but determined with 2 reactor coolant pumps operating, operation may proceed provided THERMAL POWER is restricted to:

   1. Less than or equal to 66% of RATED THERMAL POWER when the reactor coolant stop valves in the nonoperating loop are open, or

   2. Less than or equal to 71% of RATED THERMAL POWER when the reactor coolant stop valves in the nonoperating loop are closed.

### SURVEILLANCE REQUIREMENTS

4.1.3.4 The rod drop time of full length rods shall be demonstrated through measurement prior to reactor criticality:

a. For all rods following each removal of the reactor vessel head,

b. For specifically affected individual rods following any maintenance on or modification to the control rod drive system which could affect the drop time of those specific rods, and

c. At least once per 18 months.

## SHUTDOWN ROD INSERTION LIMIT

### LIMITING CONDITION FOR OPERATION

3.1.3.5 All shutdown rods shall be limited in physical insertion as specified in the CORE OPERATING LIMITS REPORT.

APPLICABILITY: MODES 1* and 2*#

ACTION:

With a maximum of one shutdown rod inserted beyond the insertion limit specified in the CORE OPERATING LIMITS REPORT, except for surveillance testing pursuant to Specification 4.1.3.1.2, within one hour either:

a. Restore the rod to within the insertion limit specified in the CORE OPERATING LIMITS REPORT, or

b. Declare the rod to be inoperable and apply Specification 3.1.3.1

### SURVEILLANCE REQUIREMENTS

4.1.3.5 Each shutdown rod shall be determined to be within the insertion limit specified in the CORE OPERATING LIMITS REPORT

a. Within 15 minutes prior to initial control rod bank withdrawal during an approach to reactor criticality, and

b. At least once per 12 hours thereafter.

*See Special Test Exceptions 3.10.2 and 3.10.3.
#With $K_{eff}$ greater than or equal to 1.0

## 3/4.10 SPECIAL TEST EXCEPTIONS

### SHUTDOWN MARGIN

### LIMITING CONDITION FOR OPERATION

3.10.1 The SHUTDOWN MARGIN requirement of Specification 3.1.1.1 may be suspended for measurement of control rod worth and SHUTDOWN MARGIN provided the reactivity equivalent to at least the highest estimated control rod worth is available for trip insertion from OPERABLE control rod(s).

APPLICABILITY: MODE 2.

ACTION:

a. With any full length control rod not fully inserted and with less than the above reactivity equivalent available for trip insertion, initiate and continue boration at greater than or equal to 10 gpm of a solution containing at least 12,950 ppm boron or its equivalent until the SHUTDOWN MARGIN required by Specification 3.1.1.1 is restored.

b. With all full length control rods inserted and the reactor subcritical by less than the above reactivity equivalent, immediately initiate and continue boration at greater than or equal to 10 gpm of a solution containing at least 12,950 ppm boron or its equivalent until the SHUTDOWN MARGIN required by Specification 3.1.1.1 is restored.

### SURVEILLANCE REQUIREMENTS

4.10.1.1 The position of each control rod either partially or FULLY WITHDRAWN shall be determined at least once per 2 hours.

4.10.1.2 Each control rod that is not fully inserted shall be demonstrated capable of full insertion when tripped from at least 50% withdrawn position within 24 hours prior to reducing the SHUTDOWN MARGIN to less than the limits of Specification 3.1.1.1.

## SPECIAL TEST EXCEPTIONS

## GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS

### LIMITING CONDITION FOR OPERATION

3.10.2 The group height, insertion and power distribution limits of Specifications 3.1.3.1, 3.1.3.5, 3.1.3.6, and 3.2.4 may be suspended during the performance of PHYSICS TESTS provided:

a. The THERMAL POWER is maintained less than or equal to 85% of RATED THERMAL POWER, and

b. The limits of Specifications 3.2.2 and 3.2.3 are maintained and determined at the frequencies specified in Specification 4.10.2.2 below.

APPLICABILITY: MODE 1.

ACTION:

With any of the limits of Specifications 3.2.2 or 3.2.3 being exceeded while the requirements of Specifications 3.1.3.1, 3.1.3.5, 3.1.3.6, and 3.2.4 are suspended, either:

a. Reduce THERMAL POWER sufficient to satisfy the ACTION requirements of Specifications 3.2.2 and 3.2.3, or

b. Be in HOT STANDBY within 6 hours.

### SURVEILLANCE REQUIREMENTS

4.10.2.1 The THERMAL POWER shall be determined to be less than or equal to 85% of RATED THERMAL POWER at least once per hour during PHYSICS TESTS.

4.10.2.2 The Surveillance Requirements of the below listed Specifications shall be performed at least once per 12 hours during PHYSICS TESTS.

a. Specification 4.2.2.2 and 4.2.2.3.

b. Specification 4.2.3.1 and 4.2.3.2.

## 3/4.1.2 BORATION SYSTEMS

The boron injection system ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include 1) borated water sources, 2) charging pumps, 3) separate flow paths, 4) boric acid transfer pumps, 5) associated heat tracing systems, and 6) an emergency power supply from OPERABLE diesel generators.

With the RCS average temperature above 200°F, a minimum of two boron injection flow paths are required to ensure single functional capability in the event an assumed failure renders one of the flow paths inoperable. The boration capability of either flow path is sufficient to provide a SHUTDOWN MARGIN from expected operation conditions of 1.77% delta k/k after xenon decay and cooldown to 200°F. The maximum expected boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires 6000 gallons of 12,950 ppm borated water from the boric acid storage tanks or 54,200 gallons of 2300 ppm borated water from the refueling water storage tank.

With the RCS temperature below 200°F, one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity change in the event the single injection system becomes inoperable.

The limitation for a maximum of one centrifugal charging pump to be OPERABLE and the Surveillance Requirement to verify all charging pumps except the required OPERABLE pump to be inoperable below 340°F provides assurance that a mass addition pressure transient can be relieved by the operation of a single PORV.

The boron capability required below 200°F is sufficient to provide a SHUTDOWN MARGIN of 1.77 delta k/k after xenon decay and cooldown from 200°F to 140°F. This condition requires either 1378 gallons of 12,950 ppm borated water from the boric acid storage tanks or 3400 gallons of 2300 ppm borated water from the refueling water storage tank.

3/4.1.2 BORATION SYSTEMS (Continued)

The contained water volume limits include allowance for water not available because of discharge line location and other physical characteristics. The OPERABILITY of one boron injection system during REFUELING insures that this system is available for reactivity control while in MODE 6.

The limits on contained water volume and boron concentration of the RWST also ensure a pH value of between 7.7 and 9.0 for the solution recirculated within the containment after a LOCA. This pH minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components.

At least one charging pump must remain operable at all times when the opposite unit is in MODE 1, 2, 3, or 4. This is required to maintain the charging pump cross-connect system operational.

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

The specifications of this section (1) ensure that acceptable power distribution limits are maintained, (2) ensure that the minimum SHUTDOWN MARGIN is maintained, and (3) limit the potential effects of rod misalignment on associated accident analyses. OPERABILITY of the movable control assemblies is established by observing rod motion and determining that rods are positioned within ± 12 steps (indicated position) of the respective demand step counter position. The OPERABILITY of the individual rod position indication system is established by appropriate periodic CHANNEL CHECKS, CHANNEL FUNCTIONAL TESTS, and CHANNEL CALIBRATIONS. OPERABILITY of the individual rod position indicators is required to determine control rod position and thereby ensure compliance with the control rod alignment and insertion limits. The OPERABLE condition for the individual rod position indicators is defined as being capable of indicating rod position within ± 12 steps of the associated demand position indicator. For power levels below 50 percent of RATED THERMAL POWER, the specifications of this section permit a maximum one hour stabilization in every 24 period (thermal "soak time") to allow stabilization of known thermal drift in the individual rod position indicator channels during which time the indicated rod position may vary from demand position indication by no more than ± 24 steps. This "1 in 24" feature is an upper limit on the frequency of thermal soak allowances and is available for both a continuous one hour period or one consisting of several discrete intervals. During this stabilization period, greater reliance is placed upon the demand position indicators to determine rod position. In addition, the ± 24 step/hour limit is not applicable when the control rod position is known to be greater than 12 steps from the rod group step counter demand position indication. Above 50 percent of RATED THERMAL POWER, rod motion is not expected to induce thermal transients of sufficient magnitude to exceed the individual rod position indicator instrument accuracy of ± 12 steps. Comparison of the demand position indicators to the bank insertion limits with verification of rod position by the individual rod position indicators (after thermal soak following rod motion below 50 percent of RATED THERMAL POWER) is sufficient verification that the control rods are above the insertion limits.

The control bank FULLY WITHDRAWN position can be varied within the interval of 225 to 229 steps withdrawn, inclusive. This interval permits periodic repositioning of the parked RCCAs to minimize wear, while having minimal impact on the normal reload core physics and safety evaluations. Changes of the RCCA FULLY WITHDRAWN position within this band are administratively controlled, using the rod insertion limit operator curve.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 149 AND 133 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 August 11, 1989, the Virginia Electric and Power Company (the licensee) proposed changes to the Technical Specifications (TS) for the North Anna Power Station, Units No. 1 and No. 2 (NA-1&2). The proposed changes would revise the NA-1&2 TS which govern the control rod insertion limits. The changes would allow greater operational flexibility with respect to control rod bank positioning as a means of minimizing localized rod control cluster assembly (RCCA) wear. Similar changes for other nuclear facilities have already been approved by the NRC.

Westinghouse, under contract to the Electrical Power Research Institute (EPRI), investigated the impact of fretting wear on control rod lifetime (Report No. NP-4512, dated March 1986). Two methods of control rod wear were identified: (1) sliding wear along the entire length of rodlets, where the rodlets contacted the upper internal guide cards during rod insertion and withdrawal, and (2) fretting wear at each of the eight guide card locations due to flow induced rodlet vibration.

Based on hot cell data, it has been determined that the RCCA wear depth can reach the Westinghouse-recommended maximum as early as 74,000 hours of critical operation time. Repositioning the RCCA banks so that a fresh surface is contacting each guide card is estimated to extend the time at which the maximum recommended wear depth is reached by about 50 percent.

The NA-1&2 Core Operating Limits Report (COLR) currently defines the RCCA fully withdrawn position as 228 steps. The licensee is proposing repositioning the RCCA banks on a routine basis to minimize fretting wear and extend the RCCA operating lifetime. TS changes are therefore being requested to allow the NA-1&2 fully withdrawn position to vary between 225 and 229 steps, inclusive. The value applicable to a specific cycle would then be defined by the licensee on a case-by-case basis.

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## 2.0 DISCUSSION

To implement the proposed change in the fully withdrawn position, the control bank insertion limits must be modified. Currently, the NA-1&2 COLRs define the fully withdrawn position as 228 steps. These figures would be changed to show rod positions up to a maximum fully withdrawn position of 229 steps. The fully withdrawn position, which is to be used for a given cycle, would be defined prior to initiation of the nuclear design calculations for that cycle, and documented in the nuclear design report and reload Safety Evaluation. The cycle-specific fully withdrawn position would be provided to the operators in the rod insertion limit operator curve. That curve would also define the C-bank insertion limit endpoint corresponding to the fully withdrawn position. Aside from changing the fully withdrawn position, the insertion limits would not change. Therefore, these same curves would be applicable for fully withdrawn positions from 225 to 229 steps, with the only difference being the definition of the fully withdrawn position (i.e., the applicable upper bound on the y-axis).

Inserting the RCCAs a small number of additional steps from their current withdrawn position would result in a negligible change to core power distributions and peaking factors. This conclusion is supported by two facts: (1) there is very little power generated in the top portion of the core, and (2) when the rods are positioned at 225 steps, they are inserted to the top of, but not into, the active fuel region. (In the current fully withdrawn position, the RCCAs are positioned above the top of the active fuel stack).

The licensee has evaluated the impact of changing the RCCA fully withdrawn position. This assessment consisted of two portions: (1) the potential impact on the models and methods used for neutronic calculations, and (2) the impact on the core physics-related key analysis parameters for reload safety analysis.

Current design predictions and reload evaluations were performed using the NRC-approved PDQ07, FLAME, and NOMAD models (VEP-FRD-19A, "The PDQ 07 Discrete Model," Virginia Electric and Power Company, July 1981; VEP-FRD-24A, "The VEPCO FLAME Model," Virginia Electric and Power Company, July 1981; and VEP-NFE-1-A, "NOMAD Code and Model," Virginia Electric and Power Company, May 1985). It was determined that these models are suitable for modeling an all rods out (ARO) position between 225 and 229 steps, inclusive. The effects of the ARO changes in this range are easily compensated for, because the RCCAs would continue to be positioned above the top of the active core when they are in the fully withdrawn position.

A generic assessment of the impacts of changing the RCCA fully withdrawn position on safety analysis inputs was performed by the licensee, as discussed below. A cycle-specific analysis would also be performed as part of the reload safety evaluation process prior to implementation of a new ARO position. This analysis would confirm that, for the cycle in question, the amount of margin remaining for any affected key analysis parameter is sufficient to accommodate the effects of the ARO position change.

The generic evaluation indicated that a core reload would be impacted in the following areas: (1) integral rod worths, (2) power distributions, (3) reactivity redistribution, (4) boron concentrations, and (5) burnup distributions.

When the RCCAs are inserted further than the current 228 step "parked" position, the rod worths associated with that insertion are not available during a trip, which results in a decrease in excess shutdown margin and trip reactivity magnitude. For these parameters, the differences would be negligible in comparison with the excess margin which has been available in recent reload evaluations. The reduction in trip reactivity at hot full power would produce more limiting results for trip reactivity vs. position. However, for those transients affected by trip reactivity vs. position (e.g., the loss of flow accident), conservatisms exist in the key analysis parameters to accommodate the impact of the trip reactivity change with no change to the Updated Final Safety Analysis Report (UFSAR) results.

A three step rod insertion (to step 225) would result in slight changes to the axial and radial power distributions. These changes may result in slight increases in FdH and Fq. These differences would be taken into consideration during the reload design phase, using physics models capable of determining the impact on power distributions. The Fq and FdH values would remain within their respective limits.

Increased rod shadowing caused by the slight insertion of the rods would result in a slight increase in the end-of-cycle reactivity redistribution factor when changing from hot full power to hot zero power. This results in a decrease in shutdown margin and available trip reactivity. Again, sufficient margin is available to accommodate these slight changes.

Boron concentrations would be reduced slightly when the RCCAs are inserted further. This would actually provide a small amount of additional margin for inadvertent boron dilution and beginning-of-cycle temperature coefficients. The rod shadowing effects would also result in slight changes in core isotopics, resulting in an impact on temperature coefficients. These changes are expected to be minor, and margin exists in the key analysis parameters to accommodate the impact.

Changes in burnup distribution due to rod insertion would impact differential rod worth (rod withdrawal), trip reactivity vs. position, and power distributions. These differences would be small and can be readily absorbed in available margin, or can be accommodated by conservatisms in other key analysis parameters, with no adverse impact on the UFSAR results.

It was determined that the differences in these five areas would be minor. For key analysis parameters which became more limiting, either available margin exists or the difference would be properly accounted for with the physics models.

Withdrawing the RCCAs an additional step from their current withdrawn position would have a negligible impact on the core power distributions and peaking factors, because in both cases, the RCCAs are positioned above the top of the active fuel stack in the fully withdrawn position. Increasing the fully withdrawn position would also increase the rod drop time. However, it was determined that increasing the fully withdrawn position by one step would increase the control rod drop time by only about 0.01 sec. This time change is minimal, and of insufficient magnitude to affect the overall rod drop time used in any safety calculations. In addition, the NA-1&2 TS limit on maximum rod drop time would be unchanged. Control rod drop time measurements performed prior to the startup of each operating cycle would verify that the rod drop time from the maximum fully withdrawn position of 229 steps is less than the maximum 2.7 seconds allowed by the NA-1&2 TS.

A change in the rod drop distance might be expected to affect the trip rod position versus time curve. This curve is used to compare the calculated reload reactivity worth vs. position with the reactivity worth vs. time curve used in the safety analyses. The rod position versus time curve currently used for safety calculations (which is based on the maximum allowable rod drop time in the NA-1&2 TS) would be bounding for fully withdrawn positions less than or equal to the current 228-step ARO position. For a fully withdrawn position of 229 steps, the increase in the rod drop distance might be expected to have some small impact on the rod position versus time curve. However, sufficient margin exists in the reload reactivity worth versus position curves to offset the impact on the rod position versus time curve. Therefore, the reactivity worth versus time curve currently used in the UFSAR would remain bounding for fully withdrawn positions between 225 and 229 steps, inclusive.

The impact of the rod position change on future cycles would be addressed in the design analysis by incorporating the actual limits applicable to any given cycle into the reload design and safety evaluation for that cycle. Overall, the anticipated changes to the nuclear design predictions are minor. The models are expected to continue to provide predictions which are within acceptable criteria constraints.

## 3.0 EVALUATION

The extremely small impact on power distributions and core physics key analysis parameters resulting from the change in the fully withdrawn position can be accommodated within the existing NA-1&2 core design limits. None of the parameter changes exceed the available margin to the key parameter safety analysis limits. The current control rod drop times and other tripped rod characteristics assumed in the safety analyses would not be changed as a result of the RCCA fully withdrawn position change. Therefore, the current safety analyses will remain bounding. Also, a cycle-specific evaluation of compliance with UFSAR acceptance criteria would also be performed prior to implementation of the initial change to the RCCA fully withdrawn position. Future changes to the ARO position within the proposed allowable band would similarly be incorporated into the nuclear design and safety calculations for

the cycle, and so would be assessed for compliance with the UFSAR criteria as part of the NRC-approved normal reload design process; VEP-FRD-42 Revision 1A, "Reload Nuclear Design Methodology," Virginia Electric and Power Company, September 1986. Therefore, the NRC staff finds the proposed change to the NA-1&2 TS acceptable.

## 4.0 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.

## 5.0 ENVIRONMENTAL CONSIDERATION

These amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. 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 (54 FR 37055). 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.

## 6.0 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.

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Date: November 22, 1991