

July 5, 1990

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: REMOVAL
OF 3.25 LIMIT ON EXTENDING SURVEILLANCE INTERVALS (TAC NOS. 76750
AND 76751)

The Commission has issued the enclosed Amendment Nos. 129 and 113 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 Speci-
fications (TS) in response to your letter dated March 23, 1990.

The amendments remove the 3.25 limit on extending surveillance intervals
specified in the current NA-1&2 TS 4.0.2. In addition, a 24-hour period is
allowed to complete a missed surveillance requirement before entering into an
applicable action statement as specified in NA-1&2 TS 4.0.3. The specific
changes are in conformance with the guidelines specified in Generic Letters
87-09 and 89-14.

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

Enclosures:

1. Amendment No. 129 to NPF-4
2. Amendment No. 113 to NPF-7
3. Safety Evaluation

cc w/enclosures:
See next page

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DATED: July 5, 1990

AMENDMENT NO. 129 TO FACILITY OPERATING LICENSE NO. NPF-4-NORTH ANNA UNIT 1
AMENDMENT NO. 113 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

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D. Miller

L. Engle

J. Gitter

H. Silver

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D. Hagan, 3302 MNBB

E. Jordan, 3302 MNBB

B. Grimes, 9/A/2

G. Hill (8), P-137

Wanda Jones, P-130A

J. Calvo, 11/F/23

ACRS (10)

GPA/PA

OC/LFMB

PD Plant-specific file [Gray File]

M. Sinkule, R-II

Others as required

cc: Plant Service list

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Mr. W. L. Stewart
Virginia Electric & Power Company

North Anna Power Station
Units 1 and 2

cc:

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Mineral, Virginia 23117



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. 129
License No. NPF-4

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company et al., (the licensee) dated March 23, 1990, 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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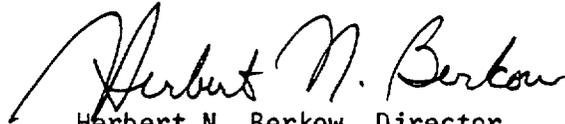
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.D.(2) of Facility Operating License No. NPF-4 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 129, 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, 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: July 5, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 129

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 0-2

B 3/4 0-3

B 3/4 0-3a (new)

B 3/4 0-4

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

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

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

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

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

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications. This specification is not applicable in MODES 5 or 6.

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

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

APPLICABILITY

SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.
- 4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval.
- 4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.
- 4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.
- 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:
- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).

APPLICABILITY

BASES (Continued)

ACTION statements for each of the applicable LCOs. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to be consistent with the ACTION statement for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components, and devices in the other division must be OPERABLE, or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source OPERABLE). In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components, and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, shutdown is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

4.0.3 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the operability requirements for a Limiting

APPLICABILITY

BASES (Continued)

Condition for Operation. Under the provisions of this specification, systems and components are assumed to be operable when surveillance requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are operable when they are found or known to be inoperable although still meeting the surveillance requirements. This specification also clarifies that the action statement requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the action statement requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the surveillance requirement within the allowable outage time limits of the action statement requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the operability requirements of a Limiting Condition for Operation. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10CFR50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the action statement requirements are less than 24 hours or a shutdown is required to comply with action statement requirements, e.g., Specification 3.0.3, a 24 hour allowance is provided to permit a delay in implementing the action statement requirements. This provides an adequate time limit to complete surveillance requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with action statement requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. If a surveillance is not completed within the 24 hour allowance, the time limits of the action statement requirements are applicable at the time. When a surveillance is performed within the 24 hour allowance and the surveillance requirements are not met, the time limits of the action statement requirements are applicable at the time that the surveillance is terminated.

Surveillance requirements do not have to be performed on inoperable equipment because the action statement requirements define the remedial measures that apply. However, the surveillance requirements have to be met to demonstrate that inoperable equipment has been restored to operable status.

APPLICABILITY

BASES

4.0.4 This specification ensures that the surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an OPERATIONAL MODE or other applicable condition. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant startup or following extended plant outages, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.

4.0.5 This specification ensures that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by the 10 CFR 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these Technical Specifications.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout these Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. For example, the requirements of Specification 4.0.4 to perform surveillance activities prior to entry into an OPERATIONAL MODE or other specified applicability condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps to be tested up to one week after return to normal operation. And for example, the Technical Specification definition of OPERABLE does not grant a grace period before a device that is not capable of performing its specified function is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.



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. 113
License No. NPF-7

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company, et al., (the licensee) dated March 23, 1990, 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.

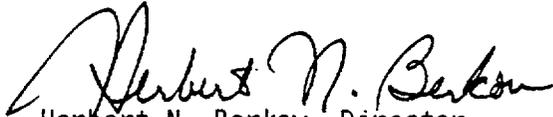
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-7 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 113, 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, 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: July 5, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 113

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

3/4 0-2

B 3/4 0-3

B 3/4 0-3a (new)

B 3/4 0-4

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

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

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

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications. This specification is not applicable in MODES 5 or 6.

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications.

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

APPLICABILITY

SURVEILLANCE REQUIREMENTS

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

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.

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

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

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

APPLICABILITY

BASES (Continued)

consistent with the ACTION statement for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components, and devices in the other division must be OPERABLE, or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source OPERABLE). In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components, and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, shutdown is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

4.0.3 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the operability

APPLICABILITY

BASES (Continued)

requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be operable when surveillance requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are operable when they are found or known to be inoperable although still meeting the surveillance requirements. This specification also clarifies that the action statement requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the action statement requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the surveillance requirement within the allowable outage time limits of the action statement requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the operability requirements of a Limiting Condition for Operation. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10CFR50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the action statement requirements are less than 24 hours or a shutdown is required to comply with action statement requirements, e.g., Specification 3.0.3, a 24 hour allowance is provided to permit a delay in implementing the action statement requirements. This provides an adequate time limit to complete surveillance requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with action statement requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. If a surveillance is not completed within the 24 hour allowance, the time limits of the action statement requirements are applicable at the time. When a surveillance is performed within the 24 hour allowance and the surveillance requirements are not met, the time limits of the action statement requirements are applicable at the time that the surveillance is terminated.

Surveillance requirements do not have to be performed on inoperable equipment because the action statement requirements define the remedial measures that apply. However, the surveillance requirements have to be met to demonstrate that inoperable equipment has been restored to operable status.

APPLICABILITY

BASES

4.0.4 This specification ensures that the surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an OPERATIONAL MODE or other applicable condition. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant startup or following extended plant outages, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.

4.0.5 This specification ensures that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these Technical Specifications.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout these Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. For example, the requirements of Specification 4.0.4 to perform surveillance activities prior to entry into an OPERATIONAL MODE or other specified applicability condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps to be tested up to one week after return to normal operation. And for example, the Technical Specification definition of OPERABLE does not grant a grace period before a device that is not capable of performing its specified function is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 129 AND 113 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

INTRODUCTION

By letter dated March 23, 1990, 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).

Specifically, the changes would remove the 3.25 limit on extending surveillance intervals required by TS 4.0.2 for NA-1&2 as recommended by NRC Generic Letter 89-14. In addition, the changes would extend TS 4.0.3 to allow a 24-hour period to complete a missed surveillance requirement before entering into the applicable action statement in accordance with NRC Generic Letter 87-09.

DISCUSSION

The NA-1&2 TS 4.0.2 permits surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillance activities to be postponed when plant conditions are not suitable for conducting the surveillance, for example, under transient conditions or other ongoing surveillance or maintenance activities. TS 4.0.2 also limits extending surveillances so that the combined time interval for any three consecutive surveillance intervals does not exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent. As currently expressed, this specification is consistent with the Standard TS for Westinghouse Pressurized Water Reactors, NUREG-0452, Revision 4.

On August 21, 1989, the NRC issued Generic Letter (GL) 89-14, which provides guidance to licensees for proposing a license amendment to implement removal of the 3.25 limitation for three consecutive surveillance intervals. As stated in the GL, the NRC considers this to be a line-item improvement to the TS. The revised specification will remove an unnecessary restriction on extending surveillance requirements and will result in a benefit to safety when plant conditions are not conducive to the safe conduct of surveillance requirements. The removal of the 3.25 limit will provide greater flexibility in the use of the provision for extending surveillance intervals, reduce the administrative burden associated with its use, and have a positive effect on safety.

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Revised TS 4.0.3 would permit delaying the requirement of an action statement for up to 24 hours to permit the completion of a missed surveillance when the allowable outage time limits of the action statement are less than 24 hours or require a shutdown. As discussed in GL 87-09, it is overly conservative to assume that systems or components are immediately inoperable because a surveillance requirement has not been performed. Generally, the opposite is in fact the case. The vast majority of surveillances confirm that the tested system or component is within requirements and operable. When a surveillance is missed, it is this positive verification of operability that has not been confirmed by the performance of the required surveillance. Because the allowable outage time limits of some action statements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements may apply, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. GL 87-09 states that, based on these considerations, 24 hours is an acceptable time limit for completing a missed surveillance when the allowable outage times of the action statements are less than this time limit or when shutdown action statements apply. The GL concludes that the 24-hour time limit adequately balances the risks associated with potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with action statements before the surveillance can be completed.

These proposed TS changes are consistent with the guidance provided in NRC GL 89-14 and NRC GL 87-09. Approval of the change request will produce the following benefits:

1. Facilitate scheduling of surveillance activities and allow surveillances to be postponed when plant conditions are not conducive to the safe conduct of the surveillance.
2. Reduce the potential for unnecessary forced shutdowns to perform surveillance activities.
3. Eliminate the administrative and logistical burdens associated with tracking the use of the 25 percent allowance to ensure compliance with 3.25 limit.

EVALUATION

GL 87-09 stated that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. Therefore, delay of up to 24 hours to permit completion of a missed surveillance would be allowed. The GL also states that the 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with plant upset and challenge to safety systems when the alternative is shut down.

For the changes intended to achieve consistency with the recommendations of GL 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," the NRC staff has previously evaluated these changes in the GL and determined that the modifications will result in improved TS.

GL 89-14 states that removal of the 3.25 limitation for three consecutive surveillance intervals will remove an unnecessary restriction on extending surveillance requirements and will result in a benefit to safety when plant conditions are not conducive to the safe conduct of surveillance requirements.

The proposed changes are in accordance with the guidance provided in GLs 87-09 and 89-14. Therefore, based on all of the above, we find the proposed changes to be acceptable.

Finally, the staff noted an administrative error in the licensee's proposed changes to the Bases pages. The change to TS 4.0.3 on page B 3/4 0-3 involved additional paragraphs which required the addition of a new page (B 3/4 0-3a). However, page B 3/4 0-4, which was not included in the licensee's submittal, still contained language from the unchanged TS 4.0.3. Therefore, for consistency the staff has included page B 3/4 0-4 in these amendments with the incorrect language from TS 4.0.3 deleted.

ENVIRONMENTAL CONSIDERATION

These amendments involve a change to a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. We have 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 these amendments involve no significant hazards consideration and there has been no public comment on such finding. 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.

CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Date: July 5, 1990

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