April 22, 1994

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 COMPONENTS LISTS FROM TECHNICAL SPECIFICATIONS (TAC NOS. M87869 AND M87870)

The Commission has issued the enclosed Amendment Nos. 181 and 162 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 October 8, 1993.

The amendments revise the NA-1&2 TS by deleting tables listing certain components from the TS and relocating the lists to plant procedures in accordance with the guidance provided in NRC Generic Letter 91-08, "Removal of Component Lists from Technical Specifications."

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

Sincerely,
(Original Signed By)

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

9405050117 940422
PDR ADOCK 05000338
P PDR

Enclosures:
1. Amendment No. 181 to NPF-4
2. Amendment No. 162 to NPF-7
3. Safety Evaluation

cc w/enclosures: See next page

| OFC | :LA:PDII-2 | :PM:PDII-2 | :D:PDII-2 | :OGC | : subject to |
|---|---|---|---|---|---|
| NAME | :ETana | :LEngle | :HBerkow | :CMarco: | - changes |
| DATE | : 3/22/94 | : 3/22/94 | : 3/22/94 | : 4/11/94 | : |

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

North Anna Power Station
Units 1 and 2

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DATED: April 22, 1994

AMENDMENT NO. 181 TO FACILITY OPERATING LICENSE NO. NPF-4-NORTH ANNA UNIT 1
AMENDMENT NO. 162 TO FACILITY OPERATING LICENSE NO. NPF-7-NORTH ANNA UNIT 2

Docket File
NRC & Local PDRs
PDII-2 Reading
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OGC
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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. 181
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 October 8, 1993, 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.

9405050127 940422
PDR ADOCK 05000338
P PDR

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. 181 , 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 its 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: April 22, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 181

TO FACILITY OPERATING LICENSE NO. NPF-4

DOCKET NO. 50-338

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

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## 1.0 DEFINITIONS

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

### ACTION

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

### AXIAL FLUX DIFFERENCE

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

### CHANNEL CALIBRATION

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

### CHANNEL CHECK

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

### CHANNEL FUNCTIONAL TEST

1.5 A CHANNEL FUNCTIONAL TEST shall be:

a. Analog channels - the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions.

b. Bistable channels - the injection of a simulated signal into the sensor to verify OPERABILITY including alarm and/or trip functions.

### CONTAINMENT INTEGRITY

1.6 CONTAINMENT INTEGRITY shall exist when:

1.6.1 All penetrations required to be closed during accident conditions are either:

a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or

b. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.

1.6.2 All equipment hatches are closed and sealed.

1.6.3 Each air lock is OPERABLE pursuant to Specification 3.6.1.3.

1.6.4 The containment leakage rates are within the limits of Specification 3.6.1.2 and

1.6.5 The sealing mechanism associated with each penetration (e.g. welds, bellows or O-rings) is OPERABLE.

CONTROLLED LEAKAGE

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

CORE ALTERATION

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

CORE OPERATING LIMITS REPORT

1.9 The CORE OPERATING LIMITS REPORT is the unit-specific document that provides core operating limits for the current operating reload cycle. These cycle-specific core operating limits shall be determined for each reload cycle in accordance with Specification 6.9.1.7 Plant operation within these operating limits is addressed in individual specifications.

DOSE EQUIVALENT I-131

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

$\bar{E}$-AVERAGE DISINTEGRATION ENERGY

1.11 $\bar{E}$ shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives greater than 15 minutes, making up at least 95% of the total non-iodine activity in the coolant.

## 3/4.6 CONTAINMENT SYSTEMS

## 3/4.6.1 CONTAINMENT

## CONTAINMENT INTEGRITY

### LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3, and 4

ACTION

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

### SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

a. At least once per 31 days by verifiying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves, secured in their positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.

b. By verifying that each containment air lock is OPERABLE per Specification 3.6.1.3.

c. After each closing of the equipment hatch, by leak rate testing the equipment hatch seals, with gas at $P_a$, greater than or equal to 44.1 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Specification 4.6.1.2.b for all other Type B and C penetrations, the combined leakage rate is less than or equal to 0.60 $L_a$.

d. Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line.

*Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked sealed or otherwise sealed in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such surveillance need not be performed more often than once per 92 days.

## 3/4.6.3 CONTAINMENT ISOLATION VALVES

### LIMITING CONDITION FOR OPERATION

3.6.3.1 Each containment isolation valve shall be OPERABLE.*

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:

a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or

b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or

c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or

d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

The provisions of Specification 3.0.4 do not apply.

### SURVEILLANCE REQUIREMENTS

4.6.3.1.1 Each containment isolation valve shall be demonstrated OPERABLE:

a. At least once per 92 days by cycling each weight or spring loaded check valve testable during plant operation, through one complete cycle of full travel and verifying that each check valve remains closed when the differential pressure in the direction of flow is less than 1.2 psid and opens when the differential pressure in the direction of flow is greater than or equal to 1.2 psid but less than 5.0 psid.

* Locked or sealed closed valves may be opened on an intermittent basis under administrative control.

SURVEILLANCE REQUIREMENTS (Continued)

b. Prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of the applicable cycling test and verification of isolation time.

4.6.3.1.2 Each containment isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:

a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position.

b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position.

c. Verifying that on a Containment Purge and Exhaust isolation signal, each Purge and Exhaust valve actuates to its isolation position.

d. Cycling each weight or spring loaded check valve not testable during plant operation, through one complete cycle of full travel and verifying that each check valve remains closed when the differential pressure in the direction of flow is less than 1.2 psid and opens when the differential pressure in the direction of flow is greater than or equal to 1.2 psid but less than 5.0 psid.

4.6.3.1.3 The isolation time of each power operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

PAGES 3/4 6-17 THROUGH 3/4 6-32 HAVE BEEN DELETED

## 3/4.6.2.3 CHEMICAL ADDITION SYSTEM

The OPERABILITY of the chemical addition system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH minimum volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the accident analysis.

## 3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the times limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in communication with control room, at the valve controls, (2) instructing this operator to close the valve(s) in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valve(s) and that this action will prevent the release of radioactivity outside the containment.

## 3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with 1) zirconium-water reactions, 2) radiolytic decomposition of water 3) corrosion of metals within containment. These hydrogen control systems are consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA", March 1971.

## 3/4.6.5 SUBATMOSPHERIC PRESSURE CONTROL SYSTEM

### 3/4.6.5.1 STEAM JET AIR EJECTOR

The closure of the isolation valves in the suction of the steam jet air ejector ensures that 1) the containment internal pressure may be maintained within its operation limits by the mechanical vacuum pumps and 2) the containment atmosphere is isolated from the outside environment in the event of a LOCA. These valves are required to be closed for containment intergrity.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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. 162
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 October 8, 1993, 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. 162 , 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 its 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: April 22, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 162

TO FACILITY OPERATING LICENSE NO. NPF-7

DOCKET NO. 50-339

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

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Correction letter of 9-26-90

## 1.0 DEFINITIONS

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

### ACTION

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

### AXIAL FLUX DIFFERENCE

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

### CHANNEL CALIBRATION

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

### CHANNEL CHECK

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

### CHANNEL FUNCTIONAL TEST

1.5 A CHANNEL FUNCTIONAL TEST shall be:

a. Analog channels - the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions.

b. Bistable channels - the injection of a simulated signal into the sensor to verify OPERABILITY including alarm and/or trip functions.

### CONTAINMENT INTEGRITY

1.6 CONTAINMENT INTEGRITY shall exist when:

1.6.1 All penetrations required to be closed during accident conditions are either:

a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or

b. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.

1.6.2 All equipment hatches are closed and sealed.

1.6.3 Each air lock is OPERABLE pursuant to Specification 3.6.1.3.

1.6.4 The containment leakage rates are within the limits of Specification 3.6.1.2 and

1.6.5 The sealing mechanism associated with each penetration (e.g. welds, bellows or O-rings) is OPERABLE.

CONTROLLED LEAKAGE

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

CORE ALTERATION

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

CORE OPERATING LIMITS REPORT

1.9 The CORE OPERATING LIMITS REPORT is the unit-specific document that provides core operating limits for the current operating reload cycle. These cycle-specific core operating limits shall be determined for each reload cycle in accordance with Specification 6.9.1.7 Plant operation within these operating limits is addressed in individual specifications.

DOSE EQUIVALENT I-131

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

$\bar{E}$-AVERAGE DISINTEGRATION ENERGY

1.11 $\bar{E}$ shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives greater than 15 minutes, making up at least 95% of the total non-iodine activity in the coolant.

## 3/4.6 CONTAINMENT SYSTEMS

## 3/4.6.1 CONTAINMENT

## CONTAINMENT INTEGRITY

### LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3, and 4

### ACTION

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

### SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

a. At least once per 31 days by verifiying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves, secured in their positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.

b. By verifying that each containment air lock is OPERABLE per Specification 3.6.1.3.

c. After each closing of the equipment hatch, by leak rate testing the equipment hatch seals, with gas at $P_a$, greater than or equal to 44.1 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Specification 4.6.1.2.b for all other Type B and C penetrations, the combined leakage rate is less than or equal to 0.60 $L_a$.

d. Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line.

*Except valves, blind flanges and deactivated automatic valves which are located inside the containment and are locked sealed or otherwise sealed in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such surveillance need not be performed more often than once per 92 days.

## CHEMICAL ADDITION SYSTEM

### LIMITING CONDITION FOR OPERATION

3.6.2.3 The chemical addition system shall be OPERABLE with:

a. A chemical addition tank containing a volume of between 4800 and 5500 gallons of between 12 and 13 percent by weight NaOH solution, and

b. A chemical addition flow path capable of adding NaOH solution from the chemical addition tank to both containment quench spray system pumps via the RWST.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With the chemical addition system inoperable, restore the system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the chemical addition system to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours.

### SURVEILLANCE REQUIREMENTS

4.6.2.3 The chemical addition system shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed or otherwise secured in position, is in its correct position.

b. At least once per 6 months by:

1. Verifying the contained solution volume in the tank, and
2. Verifying the concentration of the NaOH solution by chemical analysis.

c. At least once per 18 months, during shutdown, by verifying that each automatic valve in the flow path actuates to its correct position on a Containment Pressure -- high-high test signal.

d. At least once per 5 years by verifying individual flow from the RWST and the chemical addition tank thru the drain lines in the cross connection between the respective tanks.

## 3/4.6.3 CONTAINMENT ISOLATION VALVES

### LIMITING CONDITION FOR OPERATION

3.6.3.1 Each containment isolation valve shall be OPERABLE.*

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:

a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or

b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or

c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or

d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

The provisions of Specification 3.0.4 do not apply.

### SURVEILLANCE REQUIREMENTS

4.6.3.1.1 Each containment isolation valve shall be demonstrated OPERABLE:

a. At least once per 92 days by cycling each weight or spring loaded check valve testable during plant operation, through one complete cycle of full travel and verifying that each check valve remains closed when the differential pressure in the direction of flow is less than 1.2 psid and opens when the differential pressure in the direction of flow is greater than or equal to 1.2 psid but less than 5.0 psid.

b. Prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of the applicable cycling test and verification of isolation time.

* Locked or sealed closed valves may be opened on an intermittent basis under administrative control.

SURVEILLANCE REQUIREMENTS (Continued)

4.6.3.1.2 Each containment isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:

a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position.

b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position.

c. Verifying that on a Containment Purge and Exhaust isolation signal, each Purge and Exhaust valve actuates to its isolation position.

d. Cycling each weight or spring loaded check valve not testable during plant operation, through one complete cycle of full travel and verifying that each check valve remains closed when the differential pressure in the direction of flow is less than 1.2 psid and opens when the differential pressure in the direction of flow is greater than or equal to 1.2 psid but less than 5.0 psid.

4.6.3.1.3 The isolation time of each power operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

PAGES 3/4 6-16 THROUGH 3/4 6-31 HAVE BEEN DELETED

## D.C. DISTRIBUTION - SHUTDOWN

### LIMITING CONDITION FOR OPERATION

3.8.2.4 As a minimum, the following D.C. electrical equipment and bus shall be energized and OPERABLE:

2 125-volt D.C. busses, 2-I or 2-III and 2-II or 2-IV

2 125-volt battery bank and charger associated with the above D.C. busses.

APPLICABILITY: MODES 5 and 6.

ACTION:

With less than the above complement of D.C. equipment and bus OPERABLE, establish CONTAINMENT INTEGRITY within 8 Hours.

### SURVEILLANCE REQUIREMENTS

4.8.2.4.1 The above required 125-volt D.C. bus shall be determined OPERABLE and energized at least once per 7 days by verifying correct breaker alignment and indicated power availability.

4.8.2.4.2 The above required 125-volt battery bank and charger shall be demonstrated OPERABLE per Surveillance Requirement 4.8.2.3.2.

## CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES

### LIMITING CONDITION FOR OPERATION

3.8.2.5 Primary and backup containment penetration conductor overcurrent protective devices associated with each containment electrical penetration circuit shall be OPERABLE. The scope of these protective devices excludes those circuits for which creditable fault currents would not exceed the electrical penetration design rating.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one or more of the containment penetration conductor overcurrent protective device (s) inoperable either:

a. Restore the protective device(s) to OPERABLE status or de-energize the circuit(s) by tripping the associated circuit breaker within 72 hours and verify the circuit breaker to be tripped at least once per 7 days thereafter; the provisions of Specification 3.0.4 are not applicable to overcurrent devices in circuits which have their circuit breakers tripped, or

b. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

### SURVEILLANCE REQUIREMENTS

4.8.2.5 All containment penetration conductor overcurrent protective devices shall be demonstrated OPERABLE:

a. At least once per 18 months:

1. By verifying that, on a rotating basis at least one 4.16 KV circuit breaker is OPERABLE by performing the following:

(a) A CHANNEL CALIBRATION of the associated protective relays, and

(b) An intergrated system functional test which includes simulating automatic actuation of the system and verifying that each relay and associated circuit breakers and control circuits function as designed.

SURVEILLANCE REQUIREMENTS (Continued)

2. By verifying the OPERABILITY of molded case circuit breakers, by selecting and functionally testing a representative sample of at least 10% of all the circuit breakers of that type. Circuit breakers selected for functional testing shall be selected on a rotating basis. The functional test shall consist of injecting a current input at the specified setpoint to each selected circuit breaker and verifying that each circuit breaker functions as designed. Circuit breakers found inoperable during functional testing shall be restored to OPERABLE status prior to resuming operation. For each circuit breaker found inoperable during these functional tests, an additional representative sample of at least 10% of all the circuit breakers of the inoperable type shall also be functonally tested until no more failures are found or all circuit breakers of that type have been functionally tested.

3. By verifying the OPERABILITY of fuses, by selecting and functionally testing a representative sample of each type of fuse on a rotating basis. Each representative sample of fuses shall include at least 10% of all fuses of that type. The functional test shall consist of a non-destructive resistance measurement test which demonstrates that the fuse meets its manufacturer's design criteria. Fuses found inoperable during these functional tests shall be replaced with OPERABLE fuses prior to resuming operation. For each fuse found inoperable during these functional tests, an additional representative sample of at least 10% of all fuses of that type shall be functionally tested until no more failures are found or all fuses of that type have been functionally tested.

b. At least once per 60 months by subjecting each circuit breaker to an inspection and preventive maintenance in accordance with procedures prepared in conjunction with its manufacturer's recommendations.

PAGES 3/4 8-19 and 3/4 8-20 HAVE BEEN DELETED

## MOTOR-OPERATED VALVES THERMAL OVERLOAD PROTECTION DEVICES

### LIMITING CONDITION FOR OPERATION

3.8.2.6 The thermal overload protection devices, integral with the motor starter, of each valve used in safety systems shall be OPERABLE.

APPLICABILITY: Whenever the motor operated valve is required to be OPERABLE.

ACTION:

With one or more of the thermal overload protection devices inoperable, declare the affected valve(s) inoperable and apply the appropriate ACTION Statement(s) for the affected valve(s).

### SURVEILLANCE REQUIREMENTS

4.8.2.6 The above required thermal overload protection devices shall be demonstrated OPERABLE at least once per 18 months by the performance of a CHANNEL CALIBRATION of a representative sample of at least 25% of all thermal overload devices, such that each device is calibrated at least once per 6 years.

PAGES 3/4 8-23 THROUGH 3/4 8-25 HAVE BEEN DELETED

## NORMALLY DE-ENERGIZED POWER CIRCUITS

### LIMITING CONDITION FOR OPERATION

3.8.2.7 All circuits that have containment penetrations and are not required during reactor operation shall be de-energized.

APPLICABILITY: MODES 1, 2, 3, 4.

ACTION:

With one or more of the circuits described above energized, de-energize the circuit(s) within 72 hours or be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

### SURVEILLANCE REQUIREMENTS

4.8.2.7 At least once per 31 days, verify that all the circuits described above are de-energized by noting the position of the appropriate circuit breakers.

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## 3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

### 3/4.6.2.1 and 3/4.6.2.2 CONTAINMENT QUENCH AND RECIRCULATION SPRAY SYSTEMS

The OPERABILITY of the containment spray systems ensures that containment depressurization and subsequent return to subatmospheric pressure will occur in the event of a LOCA. The pressure reduction and resultant termination of containment leakage are consistent with the assumptions used in the accident analyses.

### 3/4.6.2.3 CHEMICAL ADDITION SYSTEM

The OPERABILITY of the chemical addition system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH minimum volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the accident analysis.

## 3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the times limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in communication with control room, at the valve controls, (2) instructing this operator to close the valve(s) in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valve(s) and that this action will prevent the release of radioactivity outside the containment.

## 3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with 1) zirconium-water reactions, 2) radiolytic decomposition of water 3) corrosion of metals within containment. These hydrogen control systems are consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA", March 1971.

## 3/4.6.5 SUBATMOSPHERIC PRESSURE CONTROL SYSTEM

### 3/4.6.5.1 STEAM JET AIR EJECTOR

The closure of the isolation valves in the suction of the steam jet air ejector ensures that 1) the containment internal pressure may be maintained within its operation limits by the mechanical vacuum pumps and 2) the containment atmosphere is isolated from the outside environment in the event of a LOCA. These valves are required to be closed for containment intergrity.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS.181 AND 162 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 October 8, 1993, 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 proposed changes would delete tables listing certain components from the NA-1&2 TS and relocate these lists to plant procedures in accordance with the guidance provided in the Nuclear Regulatory Commission (NRC) Generic Letter (GL) 91-08, "Removal of Component Lists from Technical Specifications." The lists affected by this TS change request include NA-1&2 Containment Isolation Valves (Table 3.6-1), NA-2 Containment Penetration Conductor Overcurrent Protective Devices (Table 3.8-1), NA-2 Motor-Operated Valves Thermal Overload Protection and/or Bypass Devices (Table 3.8-2), and NA-2 Normally De-energized Power Circuits (Table 3.8-3). By relocating these lists to plant procedures, any identified discrepancies can be updated in a timely manner without prior NRC approval. The Limiting Conditions for Operation (LCO), the Action Statements, and the Surveillance Requirements would still apply to all the components in these lists.

Also included in the proposed changes are administrative changes which are made to enhance the accuracy and clarity of the NA-1&2 TS.

## 2.0 DISCUSSION:

GL 91-08, dated May 6, 1991, introduced an alternative to identifying every component by its plant identification number as it is currently listed in the tables of TS components. GL 91-08 provided the guidance and recommended wording for incorporation of TS component lists into plant procedures that are subject to the change control provisions for plant procedures in the administrative controls section of the TS. By relocating the component lists associated with the subject TS change request into plant procedures, the administrative change control provisions of the TS provide an adequate means to control future changes to these lists. This can be accomplished without the requirement for a change to the TS, as is required to update component

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lists in TS tables. Relocation of component lists affected by this TS change from the TS to plant procedures will not alter the existing TS LCOs, Action Statements, or Surveillance Requirements for the affected components.

TS Index Page IX (NA-1) and VIII (NA-2) 3/4.8.2 "ONSITE POWER DISTRIBUTION SYSTEMS" would be revised to reflect TS Amendment #155 for NA-1 and #137 for NA-2. These amendments were issued on April 21, 1992 and revised the A.C. and D.C. Distribution TS requirements. The index was not changed due to an oversight. Also, TS Index Page IX for NA-1 and NA-2 3/4.9.8 "RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION" would be revised to reflect TS Amendment #137 for NA-1 and #120 for NA-2. These amendments were issued on August 27, 1990, and revised the Residual Heat Removal and Coolant Circulation TS requirements. The index was not changed due to an oversight. Additionally, TS Index Page IX for NA-2 and NA-2 3/4.9.10 "WATER LEVEL - REACTOR VESSEL" would be revised to reflect TS Amendment #115 for NA-1 and #98 for NA-2. These amendments were issued on February 15, 1989, and revised the Reactor Vessel water level TS requirements. The index was not changed due to an oversight. Finally, TS Index Page VIII 3/4.8.2 "ONSITE POWER DISTRIBUTION SYSTEMS" for NA-2 would be revised to reflect the actual plant configuration. The motor-operated valves listed in TS 3.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" do not have and are not required to have bypass devices installed.

TS Definitions for "CONTAINMENT INTEGRITY" for NA-1&2 would be revised in accordance with GL 91-08. Specifically, the reference to valves listed in Table 3.6-1 of Specification 3.6.3.1 would be replaced with the phrase "for valves that are open under administrative control as permitted by Specification 3.6.3.1."

TS Surveillance Requirement 4.6.1.1.a "CONTAINMENT INTEGRITY" for NA-1&2 would be revised in accordance with GL 91-08. Specifically, the reference to valves listed in Table 3.6-1 of Specification 3.6.3.1 would be replaced with the phrase "for valves that are open under administrative control as permitted by Specification 3.6.3.1."

TS 3.6.3.1 "CONTAINMENT ISOLATION VALVES" for NA-1&2 would be revised in accordance with GL 91-08. Specifically, references to Table 3.6-1 would be deleted, a note indicating that "the provisions of Specification 3.0.4 do not apply" would be added, and a note stating that "locked or sealed closed valves may be opened on an intermittent basis under administrative control" is added to Specification 3/4.6.3. In addition, NA-1 Surveillance Requirements 4.6.3.1.1.a and 4.6.3.1.2.d would be revised to delete the "< and ≥" symbols and replaced with "less than" and "is greater than or equal to." Both Unit 1 and Unit 2 Surveillance Requirement 4.6.3.1.1.b deletes "above" for clarity as the "above" test is only for weight or spring-loaded check valves.

TS CONTAINMENT SYSTEMS BASES 3/4.6.3 for NA-1&2 would be revised in accordance with GL 91-08. Specifically, the following paragraph would be added to the appropriate bases sections: "The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative

control includes the following considerations: (1) stationing an operator, who is in constant communication with control room, at the valve controls, and (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment."

TS 3.8.2.5 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" for NA-2 would be revised in accordance with GL 91-08. Specifically, LCO 3.8.2.5 would be replaced with the LCO statements "Primary and backup containment penetration conductor overcurrent protective devices associated with each containment electrical penetration circuit shall be OPERABLE. The scope of these protective devices excludes those circuits for which credible fault currents would not exceed the electrical penetration design rating," and both the Action Statement for Specification 3.8.2.5 and Surveillance Requirement 4.8.2.5.a.1(b) are revised to delete references to Table 3.8-1.

TS 3.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" for NA-2 would be revised in accordance with GL 91-08 to delete references to Table 3.8.2. In addition, all references to the bypass devices would be deleted since none of the motor-operated valves listed in the current Table 3.8-2 are equipped with bypass devices. Deleting the reference to the bypass devices results in deleting Surveillance Requirement 4.8.2.6.a which is not required unless the bypass devices are installed.

TS 3.8.2.7 "NORMALLY DE-ENERGIZED POWER CIRCUITS" for NA-2 would be revised to delete Table 3.8-3 and references to that table in the LCO, Action, and Surveillance Requirements. In addition, the statement "when operating in Modes 1-4" would be deleted from Surveillance Requirement 4.8.2.7 as the Modes requiring the surveillance are already specified in the Applicability statement. This TS was added to NA-2 by Amendment #21, dated May 3, 1982, to list those loads whose electrical containment penetrations do not have secondary protection devices and could have creditable fault currents that could exceed the electrical penetration design rating. Although not listed in GL 91-08, this component list meets the intent of the GL for those lists that could be relocated to plant procedures.

3.0 <u>TS CHANGES</u>:

The proposed TS change would relocate the lists of containment isolation valves for NA-1&2, NA-2 containment penetration conductor overcurrent protective devices, NA-2 motor-operated valves (MOVs) thermal overload devices, and NA-2 normally deenergized loads from the TS to plant procedures which are controlled in accordance with the provisions of the administrative controls section of the applicable TS. Associated TS would be modified in accordance with GL 91-08, and administrative changes are made to enhance clarity and accuracy. Specifically, the NA-1&2 TS are revised as follows:

- NA-1 TS Index Page IX for Section 3/4.8.2 would be modified to delete subsections "A.C. Distribution - Shutdown" and "D.C.

Distribution - Shutdown" and replace with subsection "A.C. and D.C. Distribution - Shutdown" on page 3/4 8-7.

- NA-1&2 TS Index Page IX for Section 3/4.9.8 would be modified to add "(RHR)" after RESIDUAL HEAT REMOVAL and change the title of the two subsections to "Normal Water Level" and "Low Water Levels."

- NA-1&2 TS Index Page IX for Section 3/4.9.10 would be modified to add the two subsections "Fuel Assemblies" and "Control Rods."

- NA-2 TS Index Page VIII for Section 3/4.8.2 would be modified to delete subsections "A.C. Distribution - Shutdown" and D.C. Distribution - Shutdown" and replace with subsection "A.C. and D.C. Distribution - Shutdown" on page 3/4 8-12. The phrase "and/or Bypass" associated with "Motor Operated Valves Thermal Overload Protection Devices" would also be deleted.

- NA-1&2 Definition Page 1-2 item 1.6.1.b "CONTAINMENT INTEGRITY" would be modified to delete "except as provided in Table 3.6-1 of Specification 3.6.3.1" and add "except for valves that are open under administrative control as permitted by Specification 3.6.3.1."

- NA-1&2 TS Surveillance Requirement 4.6.1.1.a "CONTAINMENT INTEGRITY" would be modified to delete "except as provided in Table 3.6-1 of Specification 3.6.3.1" and add "except for valves that are open under administrative control as permitted by Specification 3.6.3.1."

- NA-1&2 TS Limiting Condition for Operation 3.6.3.1 "CONTAINMENT ISOLATION VALVES" would be modified to delete "The containment isolation valves specified in Table 3.6-1 shall be OPERABLE with isolation times as shown in Table 3.6.1" and add "Each containment isolation valve shall be OPERABLE.*"

- NA-1&2 TS Action Statement for LCO 3.6.3.1 "CONTAINMENT ISOLATION VALVES" would be modified to replace "With one or more of the isolation valve(s) specified in Table 3.6-1 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and either:" with the phrase "With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:" The sentence "The provisions of Specification 3.0.4 do not apply." would be also added at the end of the TS action statements.

- NA-1&2 TS Surveillance Requirement 4.6.3.1.1 "CONTAINMENT ISOLATION VALVES" would be modified to replace "The isolation valves specified in Table 3.6.1 shall be demonstrated OPERABLE:" with the sentence "Each containment isolation valve shall be demonstrated OPERABLE:."

- NA-1 TS Surveillance Requirement 4.6.3.1.1.a "CONTAINMENT ISOLATION VALVES" would be modified to delete the "<" symbol and replace that symbol with the phrase "less than." The "≥" symbol would be replaced with the phrase "is greater than or equal to."

- In NA-1&2 TS Surveillance Requirement 4.6.3.1.1. "CONTAINMENT ISOLATION VALVES," the note "*Locked or sealed closed valves may be opened on an intermittent basis under administrative control" would be added at the bottom of page 3/4 6-15 and page 3/4 6-14, respectively.

- In NA-1&2 TS Surveillance Requirement 4.6.3.1.1.b "CONTAINMENT ISOLATION VALVES," the word "above" would be deleted.

- In NA-1&2 TS Surveillance Requirement 4.6.3.1.2 "CONTAINMENT ISOLATION VALVES," the phrase "specified in Table 3.6-1" would be deleted.

- In NA-1 Surveillance Requirement 4.6.3.1.2.d "CONTAINMENT ISOLATION VALVES," the "<" symbol would be replaced with the phrase "less than," and the "≥" symbol would be replaced with the phrase "is greater than or equal to."

- In NA-1&2 TS Surveillance Requirement 4.6.3.1.3 "CONTAINMENT ISOLATION VALVES," the phrase "of Table 3.6-1" would be deleted.

- In NA-1&2 TS 3/4.6.3.1 "CONTAINMENT ISOLATION VALVES," pages 3/4 6-17 through 3/4 6-32 and pages 3/4 6-16 through 3/4 6-31, respectively, (Table 3.6-1, list of Containment Isolation Valves) would be deleted.

- NA-1&2 TS Bases Section 3/4.6.3 "CONTAINMENT ISOLATION VALVES" would be revised by adding the paragraph "The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with control room, at the valve controls, and (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment."

- NA-2 LCO 3.8.2.5 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" would be revised by replacing the sentence "All containment penetration conductor overcurrent protective devices shown in Table 3.8-1 shall be OPERABLE" with "Primary and backup containment penetration conductor overcurrent protective devices

associated with each containment electrical penetration circuit shall be OPERABLE. The scope of these protective devices excludes those circuits for which creditable fault currents would not exceed the electrical penetration design rating."

- NA-2 Action Statement for LCO 3.8.2.5 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" would be revised by deleting the phrase "shown in Table 3.8-1."

- NA-2 Surveillance Requirement 4.8.2.5 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" would be revised by deleting the phrase "shown in Table 3.8-1."

- NA-2 TS Surveillance Requirement 4.8.2.5.1.b "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" would be revised by deleting the phrase "and as specified in Table 3.8-1."

- NA-2 TS 3/4.8.2.5 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" would be revised by deleting pages 3/4 8-18 through 3/4 8-20 (Table 3.8-1, list of Containment Penetration Conductor Overcurrent Protective Devices).

- NA-2 3/4.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" would be revised by deleting the phrase "AND/OR BYPASS" at the top of page 3/4 8-21.

- NA-2 TS LCO 3.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" would be revised by replacing the sentence "The thermal overload protection and/or bypass devices, integral with the motor starter, of each valve listed in Table 3.8.2 shall be OPERABLE" with "The thermal overload protection devices, integral with the motor starter, of each valve used in safety systems shall be OPERABLE."

- NA-2 TS Action Statement for LCO 3.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" would be revised by deleting the phrase "and/or bypass devices."

- NA-2 Surveillance Requirement 4.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" would be revised to delete the requirement for proving the operability of (non-existent) bypass devices and replaced with "The above required thermal overload protection devices shall be demonstrated OPERABLE at least once per 18 months by the performance of a CHANNEL CALIBRATION of a representative sample of at least 25% of all thermal overload devices, such that each device is calibrated at least once per 6 years."

- NA-2 3/4.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" would be revised by deleting pages 3/4 8-22

through 3/4 8-25 (Table 3.8-2, list of Motor-Operated Valves - Thermal Overload Protection and/or Bypass Devices).

- o NA-2 TS LCO 3.8.2.7 "NORMALLY DE-ENERGIZED POWER CIRCUITS would be revised to replace the sentence "All circuits shown in Table 3.8.3 shall be de-energized:" with "All circuits that have containment penetrations and are not required during reactor operation shall be de-energized."

- o NA-2 TS Action Statement for LCO 3.8.2.7 "NORMALLY DE-ENERGIZED POWER CIRCUITS" would be reworded to read "With one or more of the circuits described above energized, de-energize the circuit(s) within 72 hours or be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours."

- o NA-2 TS Surveillance Requirement 4.8.2.7 "NORMALLY DE-ENERGIZED POWER CIRCUITS" would be reworded to read "At least once per 31 days, verify that all of the circuits described above are de-energized by noting the position of the appropriate circuit breakers."

- o NA-2 TS 3.8.2.7 "NORMALLY DE-ENERGIZED POWER CIRCUITS" would be revised to delete page 3/4 8-27 (Table 3.8-3, list of Normally De-energized Power Circuits).

4.0 EVALUATION:

The proposed TS change would relocate the lists of containment penetration conductor overcurrent protective devices (NA-1 TS 3.8.2.5, Table 3.8-1), safety-related MOV thermal overload devices (NA-2 TS 3.8.2.6, Table 3.8-2) and normally de-energized containment loads (NA-1 TS 3.8.2.7, Table 3.8-3) and containment isolation valves (NA-1&2 TS 3.6.3.1, Table 3.6-1) to plant procedures. By relocating these lists to plant procedures any identified discrepancies can be updated in a timely manner without prior NRC approval under the provisions of 10 CFR 50.59. The LCO, the Action Statements, and the Surveillance Requirements of the TS would still apply to the components in these tables. The difference would be that, rather than being specifically listed in TS tables, the lists of these components would be identified and maintained in plant procedures in accordance with the administrative control section of the applicable TS. The staff has also concluded that 10 CFR 50.36 does not require inclusion of these components in the TS because, within the operability determination for these component lists, the surveillance requirements still must be satisfied.

In addition, deleting the reference to the thermal overload bypass devices in NA-2 TS 3.8.2.6 reflects the actual plant configuration since none of the referenced MOVs have or are required to have the bypass devices.

These changes are consistent with the guidance provided in Generic Letter 93-08 and the TS requirement of 10 CFR 50.36. Therefore, the staff finds the proposed changes to be acceptable.

## 5.0 STATE CONSULTATION

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

## 6.0 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 these amendments involve no significant hazards consideration and there has been no public comment on such finding (58 FR 57860). 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 the amendments.

## 7.0 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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