

April 13, 1998

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

SUBJECT: NORTH ANNA UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: RELOCATION OF RECORD RETENTION REQUIREMENTS, IN ACCORDANCE WITH ADMINISTRATIVE LETTER 95-06, FOR NORTH ANNA POWER STATION, UNITS 1 AND 2 (TAC NOS. M97424 AND M97425)

Dear Mr. O'Hanlon:

The Commission has issued the enclosed Amendment No.208 to Facility Operating License No. NPF-4 and Amendment No. 189 to Facility Operating License No. NPF-7 for the North Anna Power Station, Unit Nos. 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TS) in response to your application transmitted by letter dated November 26, 1996.

These amendments would revise the TS to eliminate the records retention requirements from Section 6.10 of the TS since these requirements have already been relocated to the Operational Quality Assurance program, Chapter 17, in revision 32 of the Updated Final Safety Analysis Report.

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

This completes our effort on this issue and we are, therefore, closing out TAC Nos. M97424 and M97425.

Sincerely,
Original signed by:
Nageswaran Kalyanam, Project Manager
Project Directorate II-1
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

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PDR ADOCK 05000338
P PDR

Docket Nos. 50-338 and 50-339

Enclosures:

1. Amendment No. 208 to NPF-4
2. Amendment No. 189 to NPF-7
3. Safety Evaluation

cc w/enclosures:

See next page

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*See previous concurrence

OFFICE	PM:PDII-1	LA:PDII-1	HQMB	AD:PDII-1	OGC*
NAME	NKalyanam <i>WJ</i>	Dunnington <i>ED</i>	SBlack <i>SB</i>	PTKuo <i>PTK</i>	CMarco
DATE	3/31/98	3/31/98	4/10/98	4/13/98	7/23/97
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Mr. J. P. O'Hanlon
Virginia Electric & Power Company

North Anna Power Station
Units 1 and 2

cc:

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LETTER DATED: April 13, 1998

AMENDMENT NO. 208 TO FACILITY OPERATING LICENSE NO. NPF-4 - NORTH ANNA UNIT 1
AMENDMENT NO. 189 TO FACILITY OPERATING LICENSE NO. NPF-7 - NORTH ANNA UNIT 2

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11/2/91



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

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-338

NORTH ANNA POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 208
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 (the licensee) dated November 26, 1996, 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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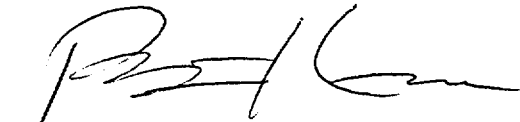
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. NPF-4 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 208, 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



P. T. Kuo, Acting Project Director
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 13, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 208

TO FACILITY OPERATING LICENSE NO. NPF-4

DOCKET NO. 50-338

Revise 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.

Remove Pages

6-22

6-23

Insert Pages

6-22

6-23

ADMINISTRATIVE CONTROLS

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6.10 RECORD RETENTION

Section 6.10, "Record Retention," has been relocated to the Operational Quality Assurance Program.

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

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-339

NORTH ANNA POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 189
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 (the licensee) dated November 26, 1996, 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 3.B of Facility Operating License No. NPF-7 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 189, 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



P. T. Kuo, Acting Project Director
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 13, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 189

TO FACILITY OPERATING LICENSE NO. NPF-7

DOCKET NO. 50-339

Revise 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.

Remove Pages

Insert Pages

6-22

6-22

6-23

6-23

6-24

6-24

ADMINISTRATIVE CONTROLS

6.10 RECORD RETENTION

Section 6.10, "Record Retention," has been relocated to the Operational Quality Assurance Program.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.1601 of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit.* Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Health Physicist.

* Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry in high radiation areas.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 208 TO FACILITY OPERATING LICENSE NO. NPF-4
AND AMENDMENT NO. 189 TO FACILITY OPERATING LICENSE NO. NPF-7

VIRGINIA ELECTRIC AND POWER COMPANY

NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-338 AND 50-339

1.0 INTRODUCTION

By letter dated November 26, 1996, Virginia Electric and Power Company submitted a request for changes to the North Anna Units 1 and 2 Technical Specifications (TS). The proposed amendments would eliminate the records retention requirements for the Administrative Section of the TS in accordance with NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

Guidance on the proposed changes was developed by NRC and provided in the Standard Technical Specifications for Westinghouse Plants, NUREG-1431.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state TS to be included as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including: (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in the plant TS.

The Commission has provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 Federal Register (FR) 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies §182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TS to licensee-controlled documents, consistent with the standard enunciated in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal

Board indicated that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety." Consistent with this approach, the Final Policy Statement identified four criteria to be used in determining whether particular safety functions are required to be included in the TS, as follows: (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety. The Commission recently adopted amendments to 10 CFR 50.36, pursuant to which the rule was revised to codify and incorporate these criteria. See Final Rule, "Technical Specifications," 60 FR 36593 (July 19, 1995). As a result, TS requirements which fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the TS, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other, licensee-controlled documents.

The Commission's policy statement provides that those existing TS LCOs which do not satisfy these four specified criteria may be relocated to the Updated Final Safety Analysis Report (UFSAR), such that future changes could be made to these provisions pursuant to 10 CFR 50.59. Other requirements may be relocated to more appropriate documents (e.g., Security Plan, Quality Assurance Plan (QAP), or Emergency Plan) and controlled by the applicable regulatory requirement. Similarly, while the required content of TS administrative controls is specified in 10 CFR 50.36(c)(5), particular details of administrative controls may be relocated to licensee-controlled documents where §50.54, §50.59, or other regulations provide adequate regulatory control.

While the criteria specifically apply to LCOs, in adopting the revision to the rule the Commission indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TS and to eliminate redundancy to other regulations, (60 FR 36957). Addressing administrative controls 10 CFR 50.36 states that they "are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The specific content of the administrative controls section of the TS is, therefore, that information that the Commission deems necessary to assure operation of the facility in a safe manner that is not already adequately covered by other regulations. Accordingly, the staff has

determined that requirements that are not specifically required under §50.36(c)(5) and which are not otherwise necessary to assure operation of the facility in a safe manner be removed from administrative controls.

3.0 EVALUATION

By letter dated November 26, 1996, the licensee proposed changes that would delete the North Anna TS requirements for record retention such that they would be located only in the Operational Quality Assurance (QA) Program. By letter dated March 3, 1998, the licensee provided Revision 32 of the UFSAR which contained revisions in the records retention provisions. The changes were reviewed in accordance with the guidance provided in, or planned for, the applicable standard technical specifications, NUREG-1431. In addition, these changes were reviewed in accordance with the guidance provided in NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance" issued on December 12, 1995 and NUREG-0800, "Standard Review Plan." Currently the record retention requirements exist in Section 6.10 of the TS and in revision 32 of the UFSAR, Chapter 17, the Operational Quality Assurance Program. This amendment is to authorize the licensee to have the record retention requirements in only one place, Chapter 17 of the UFSAR, and delete them from the Technical Specifications.

3.1 Record Retention

The licensee proposed that the requirements for record retention in TS 6.10 be deleted from the TS requirements, because they are adequately addressed by the QA Program (10 CFR Part 50, Appendix B, Criteria XVII).

Facility operations are performed in accordance with approved written procedures. Areas controlled by procedures include normal startup, operation and shutdown, abnormal conditions and emergencies, refueling, safety-related maintenance, surveillance and testing, and radiation control. Facility records document appropriate station operations and activities. Retention of these records provides document retrievability for review for compliance with requirements and regulations. Post-compliance review of records does not directly assure operation of the facility in a safe manner, as activities described in these documents have already been performed. In addition, numerous other regulations such as 10 CFR Part 20, Subpart L, and 10 CFR 50.71 require the retention of certain records related to operation of the nuclear plant.

The staff reviewed a letter dated March 3, 1998, where the licensee submitted Revision 32 to the UFSAR for North Anna Power Station. Table 17.2-3 of the Operational QA Program delineates records retention periods. The staff confirmed that current TS records retention requirements contained in section 6.10 are

generally contained in Table 17.2-3. The differences between the TS provisions and the QA program aspects were evaluated by the staff as discussed below.

TS 6.10.1.a states that "Records and logs of facility operations...." will be retained for 5 years. Table 17.2-3 states that "Records of plant operation...." will be retained for 5 years. As section 17.2.17 of the QA program states that operating logs are QA records relating to the operating status of the station, the staff concludes that TS 6.10.1.a is equivalent to the QA program content.

The Unit 1 TS 6.10.2.m and Unit 2 TS 6.10.2.n discuss the records retention provisions for meetings of the System Nuclear Safety and Operating Committee. This committee is not explicitly identified in Table 17.2-3, which lists only the current safety review committees, namely the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee. However, the licensee is committed to NRC Regulatory Guide 1.88, "Collection, Storage and Maintenance of Nuclear Power Quality Assurance Records" which endorses ANSI N45.2.9. ANSI N45.2.9, Table A provides a listing of records retention provisions which states that records of meetings involving the plant nuclear safety committee (onsite committee) and the company nuclear review board (offsite committee) will be designated lifetime retention records. As the licensee has not taken exception to ANSI N45.2.9, Table A, a QA program commitment remains to retain the System Nuclear Safety and Operating Committee records as lifetime records. To remove any ambiguities, the staff has been informed that the licensee has approved a revision to Table 17.2-3 to make a general statement that onsite and offsite safety committee records will be retained as lifetime records.

Thus, the provisions in the QA program implement the Commission's regulations pertaining to the maintenance of records related to activities affecting quality. The required controls related to record retention specified in various regulations and the provision incorporated into the QAP are considered to be redundant to the requirements currently in TS. The staff has determined that record retention requirements are adequately addressed by existing regulations and the related QAP commitments. Based upon the existence of the record retention provisions in the QAP, it is not necessary to include redundant or additional requirements in the TS administrative controls.

The staff concludes that the regulatory requirements under 10 CFR 50, Appendix B provide sufficient control of the plant records, and sufficient regulatory controls exist for future changes to the program pursuant to 10 CFR 50.54(a), such that removing these provisions from the TS is acceptable.

In conclusion, the above requirements relating to administrative controls are not required to be in the TS under 10 C.F.R. §50.36 or §182a of the Atomic Energy Act, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. In addition,

the staff finds that the resulting QA program records retention controls satisfy Appendix B to 10 CFR 50, 10 CFR 50.36(c)(2)(ii) and sufficient regulatory change controls exist under 10 CFR 50.54(a), or other applicable regulations to assure continued protection of the public health and safety. Accordingly, the staff has concluded that these requirements may be removed from the TS.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

These amendments change the recordkeeping, reporting, or administrative procedures or requirements. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Nageswaran Kalyanam

Date: April 13, 1998