

February 20, 1996

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

SUBJECT: NORTH ANNA UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: REVISIONS
TO APPENDIX B OF THE NORTH ANNA UNITS 1 AND 2 FACILITY OPERATING
LICENSES (TAC NOS. M92989 AND M92990)

Dear Mr. O'Hanlon:

The Commission has issued the enclosed Amendment Nos. 197 and 178 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 November 29, 1994.

The amendments revise Appendix B to the NA-1&2 Facility Operating Licenses,
non-radiological Environmental Protection Plan (EPP), to reflect current
obligations to the Commonwealth of Virginia, revise portions of the
transmission corridor rights-of-way erosion control program for clarification
and to be consistent with the state regulations, eliminate inconsistencies,
and delete obsolete material.

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 David B. Matthews for:

Leon B. Engle, Project Manager
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-338
and 50-339

Enclosures:

1. Amendment No. 197 to NPF-4
2. Amendment No. 178 to NPF-7
3. Safety Evaluation

cc w/enclosures: See next page

FILENAME - G:\NOANNA\NA92989X.AMD * see previous concurrence

| OFFICE | LA:PDII-1 | PM:PDII-1 | D:PDLR* | OGC* | D:PDII-1 |
|--------|------------|-----------|-----------|----------|-----------|
| NAME | Dunnington | LEngle | SNewberry | | DMatthews |
| DATE | 2/9/96 | 2/9/96 | 12/01/95 | 01/22/96 | 2/9/96 |
| COPY | Yes/No | Yes/No | Yes | Yes/No | Yes/No |

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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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Robert B. Strobe, M.D., M.P.H.
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Office of the Commissioner
Virginia Department of Health
P.O. Box 2448
Richmond, Virginia 23218

DATED: February 20, 1996

AMENDMENT NO. 197 TO FACILITY OPERATING LICENSE NO. NPF-4-NORTH ANNA UNIT 1
AMENDMENT NO. 178 TO FACILITY OPERATING LICENSE NO. NPF-7-NORTH ANNA UNIT 2

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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. 197
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 November 29, 1994, 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. 197, 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



David B. Matthews, 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: February 20, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 197

TO FACILITY OPERATING LICENSE NO. NPF-4

DOCKET NO. 50-338

Replace the following pages of the Appendix "B" 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.

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APPENDIX B

**TO FACILITY OPERATING LICENSE NO. NPF-4
NORTH ANNA POWER STATION, UNIT NO. 1**

**VIRGINIA ELECTRIC AND POWER COMPANY
DOCKET NO. 50-338**

ENVIRONMENTAL PROTECTION PLAN

**NORTH ANNA POWER STATION
ENVIRONMENTAL PROTECTION PLAN
(NON-RADIOLOGICAL)
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1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) provides for protection of the environment during the operational phase of the nuclear facility. The principal objectives of the EPP are as follows:

- (a) Verify that the plant is operated in an environmentally acceptable manner, as established by the Final Environmental Statement (FES) and other NRC environmental impact assessments.
- (b) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.
- (c) Keep NRC informed of the environmental effects of facility construction and operation and of actions taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's Virginia Pollutant Discharge Elimination System (VPDES) permit.

2.0 Environmental Protection Issues

In the Final Environmental Statement – Operating License (FES–OL) dated April 1973 the staff considered the environmental impacts associated with the operation of the North Anna Power Station. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

The monitoring programs and special studies raised by the FES–OL were completed during the initial years of facility operation. Continued monitoring is addressed by the requirements contained in the effective VPDES permit issued by the Commonwealth of Virginia, Department of Environmental Quality. Further aquatic issues are addressed by the June 24, 1986 Section 316(a) submittal and subsequent agreements reached with the Department of Environmental Quality (previously the State Water Control Board). The NRC relies on this agency for regulation of matters involving water quality and aquatic biota.

2.2 Terrestrial Issues

Specific terrestrial issues raised by the staff in the FES–OL were:

- (a) The need for controlled use of herbicides on transmission rights-of-way.
- (b) The need to control erosion resulting from modification activities, use of herbicides, and/or transmission line maintenance on transmission corridor rights-of-way.
- (c) Potential impacts on the terrestrial environment associated with use of the Waste Heat Treatment Facility.

NRC requirements with regard to the above terrestrial issues are specified in Subsection 4.2 of this EPP.

3.0 Consistency Requirements

3.1 Plant Design and Operation

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question, and do not involve a change in the Environmental Protection Plan. Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

Before engaging in additional construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity. When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the Director, Office of Nuclear Reactor Regulation. When such activity involves a change in the Environmental Protection Plan, such activity and change to the Environmental Protection Plan may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (a) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (b) a significant change in effluents or power level [in accordance with 10 CFR Part 51.60(b)(2)] or (c) a matter not previously reviewed and evaluated in the documents specified in (a) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include a written evaluation which provides bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of his Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the VPDES Permits and State Certifications

Violations of the VPDES Permit or the State certification (pursuant to Section 401 of the Clean Water Act) shall be reported to the NRC by submittal of copies of the reports required by the VPDES Permit or certification.

Changes and additions to the VPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

The NRC shall be notified of changes to the effective VPDES Permit proposed by the licensee by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The notification of a licensee-initiated change shall include a copy of the requested revision submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the VPDES permit at the same time the application is submitted to the permitting agency.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments which are required to achieve compliance with other Federal, State, or local environmental regulations are not subject to the requirements of Section 3.1.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and promptly reported to the NRC in accordance with 10 CFR 50.72(b)(2)(vi) followed by a written report as specified in Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, significant increase in nuisance organisms or conditions and unanticipated or emergency discharge of waste water or chemical substances.

4.2 Environmental Monitoring

4.2.1 Herbicide Application

The use of herbicides within the corridor rights-of-way as described and evaluated in the FES-OL dated April 1973 shall conform to the approved use of selected herbicides as registered by the Environmental Protection Agency and approved by State authorities and applied as directed by said authorities.

Records shall be maintained in the appropriate division office concerning herbicide use. Such records shall include the following information: commercial and chemical names of materials used; concentration of active material in formulations diluted for field use; diluting substances other than water; rates of application; method and frequency of application; location; and the date of application. Such records shall be maintained for a period of 5 years and be made readily available to the NRC upon request. There shall be no routine reporting requirement associated with this condition.

4.2.2 Erosion Control Inspection

Routine inspection of the station site and transmission corridor rights-of-way shall include examination for evidence of erosion. Abnormal erosion conditions within the corridor rights-of-way related to transmission activities and within the site boundaries shall be identified and recorded.

4.2.2.1 Erosion Control Inspection – Site

Field inspections of the site for evidence of erosion shall be conducted at approximately 12-month intervals. This requirement shall be applicable during the nuclear facility's operational phase and shall apply to the site as described and evaluated in the FES-OL dated April 1973.

A summary of the filed inspection program and procedures implemented to control abnormal erosion conditions associated with the nuclear facility site shall be reported in the Annual Environmental Operating Report as described in Subsection 5.4.1. Field logs indicating locations of erosion damage, measures taken to mitigate erosion problems, and estimation of the effectiveness of these mitigative measures shall be kept and made available for a period of five years. Results reported in accordance with Subsection 5.4.1 shall contain information encompassing, but not limited to, inspection date, estimated size of erosion problem area, type of stabilization program, and date of effective stabilization, as appropriate.

4.2.2.2 Erosion and Sediment Control Program – Corridor Rights-of-Way

Measures to identify and address issues concerning erosion and sediment control within the transmission line corridor rights-of-way shall be in accordance with the Erosion and Sediment Control Specification approved by the Virginia Soil and Water Conservation Board in accordance with Title 10.1, Chapter 5, Article 4, Section 10.1-563(D) of the Code of Virginia and applicable portions of the Erosion and Sediment Control Regulations, VR 625-02-00. The NRC relies on the Virginia Soil and Water Conservation Board for regulation of matters involving erosion and sediment control within the North Anna transmission line corridor rights-of-way.

Appropriate records shall be kept indicating the nature and effectiveness of corrective measures. The results of any field inspections and mitigative measures implemented to control abnormal erosion conditions associated with transmission line construction, modification, or maintenance activities or the use of herbicides shall be reported in the Annual Environmental Operating Report as described in Subsection 5.4.1.

4.2.3 Vegetation Studies

A vegetation monitoring program completed in 1981, determined that power station operation did not result in any adverse environmental impacts on the vegetation types and vegetation production in two plots adjacent to the Waste Heat Treatment Facility, two plots adjacent to Lake Anna, and one plot downstream near the Lake Anna Dam. Therefore, the non-radiological vegetation monitoring program was terminated after 1981.

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the Environmental Protection Plan. The audits shall be conducted in accordance with the approved Operational Quality Assurance Program.

5.2 Records Retention

Records and logs relative to the environmental aspects of plant operation shall be made and retained in a manner convenient for review and inspection. These records and logs shall be made available to NRC on request.

Records of modifications to plant structures, systems and components determined to potentially affect the continued protection of the environment shall be retained for the life of the plant. All other records, data and logs relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Request for change in the Environmental Protection Plan shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the Environmental Protection Plan.

5.4 Plant Reporting Requirements

5.4.1 Routine Reports

An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license.

The report shall include summaries and analyses of the results of the environmental protection activities required by Subsection 4.2 of this Environmental Protection Plan for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous nonradiological environmental monitoring reports, and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem.

The Annual Environmental Operating Report shall also include:

- (a) A list of EPP noncompliances and the corrective actions taken to remedy them.
- (b) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental issue.
- (c) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of a nonroutine event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective active taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.



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. 178
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 November 29, 1994, 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. 178, 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



David B. Matthews, 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: February 20, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 178

TO FACILITY OPERATING LICENSE NO. NPF-7

DOCKET NO. 50-339

Replace the following pages of the Appendix "B" 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.

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APPENDIX B

**TO FACILITY OPERATING LICENSE NO. NPF-7
NORTH ANNA POWER STATION, UNIT NO. 2**

**VIRGINIA ELECTRIC AND POWER COMPANY
DOCKET NO. 50-339**

ENVIRONMENTAL PROTECTION PLAN

**NORTH ANNA POWER STATION
ENVIRONMENTAL PROTECTION PLAN
(NON-RADIOLOGICAL)
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1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) provides for protection of the environment during the operational phase of the nuclear facility. The principal objectives of the EPP are as follows:

- (a) Verify that the plant is operated in an environmentally acceptable manner, as established by the Final Environmental Statement (FES) and other NRC environmental impact assessments.
- (b) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.
- (c) Keep NRC informed of the environmental effects of facility construction and operation and of actions taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's Virginia Pollutant Discharge Elimination System (VPDES) permit.

2.0 Environmental Protection Issues

In the Final Environmental Statement – Operating License (FES–OL) dated April 1973 the staff considered the environmental impacts associated with the operation of the North Anna Power Station. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

The monitoring programs and special studies raised by the FES–OL were completed during the initial years of facility operation. Continued monitoring is addressed by the requirements contained in the effective VPDES permit issued by the Commonwealth of Virginia, Department of Environmental Quality. Further aquatic issues are addressed by the June 24, 1986 Section 316(a) submittal and subsequent agreements reached with the Department of Environmental Quality (previously the State Water Control Board). The NRC relies on this agency for regulation of matters involving water quality and aquatic biota.

2.2 Terrestrial Issues

Specific terrestrial issues raised by the staff in the FES–OL were:

- (a) The need for controlled use of herbicides on transmission rights-of-way.
- (b) The need to control erosion resulting from modification activities, use of herbicides, and/or transmission line maintenance on transmission corridor rights-of-way.
- (c) Potential impacts on the terrestrial environment associated with use of the Waste Heat Treatment Facility.

NRC requirements with regard to the above terrestrial issues are specified in Subsection 4.2 of this EPP.

3.0 Consistency Requirements

3.1 Plant Design and Operation

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question, and do not involve a change in the Environmental Protection Plan. Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

Before engaging in additional construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity. When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the Director, Office of Nuclear Reactor Regulation. When such activity involves a change in the Environmental Protection Plan, such activity and change to the Environmental Protection Plan may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (a) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (b) a significant change in effluents or power level [in accordance with 10 CFR Part 51.60(b)(2)] or (c) a matter not previously reviewed and evaluated in the documents specified in (a) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include a written evaluation which provides bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of his Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the VPDES Permits and State Certifications

Violations of the VPDES Permit or the State certification (pursuant to Section 401 of the Clean Water Act) shall be reported to the NRC by submittal of copies of the reports required by the VPDES Permit or certification.

Changes and additions to the VPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

The NRC shall be notified of changes to the effective VPDES Permit proposed by the licensee by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The notification of a licensee-initiated change shall include a copy of the requested revision submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the VPDES permit at the same time the application is submitted to the permitting agency.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments which are required to achieve compliance with other Federal, State, or local environmental regulations are not subject to the requirements of Section 3.1.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and promptly reported to the NRC in accordance with 10 CFR 50.72(b)(2)(vi) followed by a written report as specified in Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, significant increase in nuisance organisms or conditions and unanticipated or emergency discharge of waste water or chemical substances.

4.2 Environmental Monitoring

4.2.1 Herbicide Application

The use of herbicides within the corridor rights-of-way as described and evaluated in the FES-OL dated April 1973 shall conform to the approved use of selected herbicides as registered by the Environmental Protection Agency and approved by State authorities and applied as directed by said authorities.

Records shall be maintained in the appropriate division office concerning herbicide use. Such records shall include the following information: commercial and chemical names of materials used; concentration of active material in formulations diluted for field use; diluting substances other than water; rates of application; method and frequency of application; location; and the date of application. Such records shall be maintained for a period of 5 years and be made readily available to the NRC upon request. There shall be no routine reporting requirement associated with this condition.

4.2.2 Erosion Control Inspection

Routine inspection of the station site and transmission corridor rights-of-way shall include examination for evidence of erosion. Abnormal erosion conditions within the corridor rights-of-way related to transmission activities and within the site boundaries shall be identified and recorded.

4.2.2.1 Erosion Control Inspection – Site

Field inspections of the site for evidence of erosion shall be conducted at approximately 12-month intervals. This requirement shall be applicable during the nuclear facility's operational phase and shall apply to the site as described and evaluated in the FES-OL dated April 1973.

A summary of the filed inspection program and procedures implemented to control abnormal erosion conditions associated with the nuclear facility site shall be reported in the Annual Environmental Operating Report as described in Subsection 5.4.1. Field logs indicating locations of erosion damage, measures taken to mitigate erosion problems, and estimation of the effectiveness of these mitigative measures shall be kept and made available for a period of five years. Results reported in accordance with Subsection 5.4.1 shall contain information encompassing, but not limited to, inspection date, estimated size of erosion problem area, type of stabilization program, and date of effective stabilization, as appropriate.

4.2.2.2 Erosion and Sediment Control Program – Corridor Rights-of-Way

Measures to identify and address issues concerning erosion and sediment control within the transmission line corridor rights-of-way shall be in accordance with the Erosion and Sediment Control Specification approved by the Virginia Soil and Water Conservation Board in accordance with Title 10.1, Chapter 5, Article 4, Section 10.1-563(D) of the Code of Virginia and applicable portions of the Erosion and Sediment Control Regulations, VR 625-02-00. The NRC relies on the Virginia Soil and Water Conservation Board for regulation of matters involving erosion and sediment control within the North Anna transmission line corridor rights-of-way.

Appropriate records shall be kept indicating the nature and effectiveness of corrective measures. The results of any field inspections and mitigative measures implemented to control abnormal erosion conditions associated with transmission line construction, modification, or maintenance activities or the use of herbicides shall be reported in the Annual Environmental Operating Report as described in Subsection 5.4.1.

4.2.3 Vegetation Studies

A vegetation monitoring program completed in 1981, determined that power station operation did not result in any adverse environmental impacts on the vegetation types and vegetation production in two plots adjacent to the Waste Heat Treatment Facility, two plots adjacent to Lake Anna, and one plot downstream near the Lake Anna Dam. Therefore, the non-radiological vegetation monitoring program was terminated after 1981.

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the Environmental Protection Plan. The audits shall be conducted in accordance with the approved Operational Quality Assurance Program.

5.2 Records Retention

Records and logs relative to the environmental aspects of plant operation shall be made and retained in a manner convenient for review and inspection. These records and logs shall be made available to NRC on request.

Records of modifications to plant structures, systems and components determined to potentially affect the continued protection of the environment shall be retained for the life of the plant. All other records, data and logs relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Request for change in the Environmental Protection Plan shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the Environmental Protection Plan.

5.4 Plant Reporting Requirements

5.4.1 Routine Reports

An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license.

The report shall include summaries and analyses of the results of the environmental protection activities required by Subsection 4.2 of this Environmental Protection Plan for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous nonradiological environmental monitoring reports, and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem.

The Annual Environmental Operating Report shall also include:

- (a) A list of EPP noncompliances and the corrective actions taken to remedy them.
- (b) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental issue.
- (c) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of a nonroutine event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 197 AND 178 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

Appendix B to the North Anna Unit 1 and Unit 2 (NA-1&2) Facility Operating Licenses describes the non-radiological Environmental Protection Plans (EPPs). The EPPs stipulate requirements applicable to monitoring and protecting the environment in the vicinity of the North Anna power station during construction and operation.

By letter dated November 29, 1994, Virginia Electric and Power Company (the licensee) submitted proposed changes to the NA-1&2 Facility Operating Licenses' EPPs. The proposed changes update the EPPs to reflect current obligations to the Commonwealth of Virginia, revise portions of the transmission corridor rights-of-way erosion control program for clarification and to be consistent with the state regulations, eliminate inconsistencies, and delete obsolete material. The EPPs currently provide commitments that are redundant with programs established in compliance with state regulations. The specific changes to the NA-1&2 EPPs are as follows:

1. The Table of Contents is revised as follows:
 - a. The title for Section 3.2 is changed to reflect that the National Pollutant Discharge Elimination System (NPDES) is the Virginia Pollutant Discharge Elimination System (VPDES) permit.
 - b. Subsections, titles, and page numbers are added for EPP subsections 4.2.1, 4.2.2, 4.2.2.1, 4.2.2.2, 4.2.3, 5.4.1, and 5.4.2.
 - c. The text for chapter titles is capitalized to enhance readability.
2. Chapter 1, Objectives of the Environmental Protection Plan, is revised to reflect that the construction phase has been completed, to define Final Environmental Statement (FES), and to replace the reference to the NPDES with a reference to the VPDES.

3. Chapter 2, Environmental Protection Issues, is revised to delete references to studies documenting the levels of intake entrainment and impingement [Section 316(b) demonstration requirements of the Clean Water Act] and to the aquatic monitoring programs which confirm adequate thermal mixing [Section 316(a) demonstration requirements of the Clean Water Act]. NPDES is replaced with VPDES and the reference to the "State Water Control Board" is changed to the "Department of Environmental Quality."
4. Chapter 3, Consistency Requirements, is revised to correct typographical errors and replace the references to NPDES permit with VPDES permit.
5. Chapter 4, Environmental Conditions, is revised as follows:
 - a. Reporting of unusual or important environmental events is updated to reflect current NRC reporting requirements.
 - b. Subsection 4.2.2.1 is added to clarify the EPP's requirements for erosion control at the site and to eliminate a records retention inconsistency.
 - c. Subsection 4.2.2.2 is added to clarify that the NRC will rely on the Virginia Soil and Water Conservation Board to regulate erosion and sediment control issues along North Anna's transmission corridor rights-of-way.
 - d. The discussion of vegetation studies is revised to reflect that these studies were completed in 1981.
6. Chapter 5, Administrative Procedures, is revised to indicate that audits of the EPP are conducted in accordance with the approved 10 CFR Part 50, Appendix B Program and to correct a minor grammatical error.

2.0 EVALUATION

The majority of the above changes are administrative in nature and either update the EPPs to reflect the licensee's current obligations to the Commonwealth of Virginia, correct inconsistencies, or eliminate obsolete requirements. The NA-1&2 EPPs have not been updated since 1983. Since that time, several changes concerning non-radiological environmental protection have occurred. Particularly, the Environmental Protection Agency (EPA) has delegated certain aspects of its authority to individual state regulatory agencies. The EPA has delegated the NPDES permitting to individual state authorities. For the Commonwealth of Virginia, the Department of Environmental Quality issues a VPDES permit. The current EPP references the State Water Control Board as the authority for issuing a NPDES permit. Therefore, the licensee is changing the EPPs to reflect the agency name change.

The changes associated with the four NA-1&2 transmission corridor rights-of-way affect the frequency of inspections for erosion damage within those areas. The current EPPs require that routine inspection of transmission lines "shall

be conducted at approximately 12-month intervals as a minimum." The licensee's proposed change to the EPPs identifies current requirements imposed by the Virginia Soil and Water Conservation Board, which is responsible for reviewing and approving utility erosion and sediment control specifications. This program is required to be implemented and revised annually. The proposed change to the EPPs retains the requirement to report results of inspections of transmission line corridor rights-of-way to the NRC annually and to retain documentation on erosion damage found, its location, most likely cause, corrective measures, and success of those measures.

However, the current EPPs are more restrictive than state regulations concerning routine inspections of the transmission line corridor rights-of-way. State regulations require "routine" inspections. The frequencies of inspecting the licensee's transmission and distribution network corridor rights-of-way are based upon the specific area, the erosion history, and the transmission line size. The licensee is proposing to change the annual inspection interval to once every three to five years to ensure uniformity with Virginia Power's other transmission corridor rights-of-way. The longer inspection interval applies only to inspections specifically for erosion and vegetation. Inspections of the transmission lines and towers will still be performed annually to ensure that these facilities are in good repair. The licensee has stated that "adopting such performance-based inspection methodology for the North Anna transmission line corridor rights-of-way is considered prudent in that it will provide a uniform standard for all of Virginia Power's transmission line corridors, will continue to ensure proper land management within the transmission line corridor rights-of-way, and will result in a cost benefit."

The studies for the effects of facility operation on aquatic and terrestrial biota as mentioned in each EPP as "will be performed" were completed on or before June 24, 1986. The aquatic and terrestrial environs around NA-1&2 are routinely monitored in accordance with the state-approved VPDES. However, the VPDES permit does not address Section 316(b) demonstration requirements. Therefore, the licensee is correcting the EPPs to reflect these facts.

The staff has reviewed the licensee's proposed changes to the EPPs and finds them acceptable. The majority of changes are administrative in nature and only serve to clarify the current EPPs. Specifically, references to NPDES permits are changed to reflect the correct permit title, VPDES. Vegetation and aquatic biota studies referred to in the EPPs have been satisfactorily completed. The discussion of the detailed subject matter in these studies is removed because it is extraneous information. A reference to 10 CFR 51.5(b)(2), which does not exist, is corrected to 10 CFR 51.60(b)(2). The explicit reporting requirements for unusual or important environmental events are replaced with the reporting requirement which the NRC has required pursuant to 10 CFR 50.72 (b)(2)(vi). Therefore, the reporting inconsistency is resolved. The description of the audit program to be utilized for auditing the EPP is replaced by referring to the Audit Program established in accordance with 10 CFR Part 50, Appendix B. Another inconsistency is eliminated by revising the 2-year records retention requirement for erosion control inspection field logs to 5 years. This makes the requirement consistent with EPP Section 5.2, Records Retention. References to the State

Water Control Board are updated to that agency's successor, the Department of Environmental Quality.

Additionally, the licensee's obligation to comply with Virginia regulations concerning erosion and sediment control within the transmission corridor rights-of-way are recognized to eliminate redundancy with previous EPP commitments. The Virginia Soil and Water Conservation Board is recognized as the regulatory authority concerning erosion within the transmission corridor rights-of-way. The Virginia Soil and Water Conservation Board reviews and approves erosion and sediment control specifications submitted by utilities on an annual basis. The licensee's proposed change to increase the inspection interval in this area is therefore acceptable.

3.0 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.

4.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35 an Environmental Assessment and Finding of No Significant Impact has been prepared and published in the Federal Register on February 16, 1996 (61 FR 6268). Accordingly, based upon the environmental assessment, the Commission has determined that the issuance of these amendments will not have a significant effect on the quality of the human environment.

5.0 CONCLUSION

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

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Date: February 20, 1996