

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 29, 2001

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No.: 01- 358A
DCH R0
Docket Nos.: 50-338
50-339
License Nos.: NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
NORTH ANNA POWER STATION UNITS 1 AND 2
PROPOSED IMPROVED TECHNICAL SPECIFICATIONS
REQUEST FOR ADDITIONAL INFORMATION
SECTION 5.0: DISCUSSION OF CHANGE LA.6
(TAC Nos. MB 0799 and MB 0800)

This letter transmits our response to the NRC's request for additional information (RAI) regarding the North Anna Power Station (NAPS) Units 1 and 2 proposed Improved Technical Specifications (ITS). The North Anna ITS license amendment request was submitted to the NRC in a December 11, 2000 letter (Serial No. 00-606). The NRC requested additional information regarding removal of the requirements for the Management Safety Review Committee (MSRC), Station Nuclear Safety and Operating Committee (SNSOC), and Station Nuclear Safety (SNS) from the current Technical Specifications to the QA Topical Report. This change was justified by Discussion of Change LA.6 in ITS Section 5.0. This information was requested in a NRC letter dated June 1, 2001 (TAC Nos. MB0799 and MB0800). This letter transmits supplemental information as part of the RAI response by letter dated August 27, 2001 (Serial No. 01-358).

Attached is the NRC's RAI, our supplemental response to the RAI, and copies of the affected QA Topical Report pages.

If you have any further questions or require additional information, please contact us.

Very truly yours,



Leslie N. Hartz
Vice President - Nuclear Engineering

Attachment

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cc: U.S. Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Suite 23T85
Atlanta, Georgia 30303-8931

Mr. Tommy Le
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 12 H4
Rockville, MD 20852-2738

Mr. M. J. Morgan
NRC Senior Resident Inspector
North Anna Power Station

Commissioner (w/o attachments)
Bureau of Radiological Health
1500 East Main Street
Suite 240
Richmond, VA 23218

Mr. J. E. Reasor, Jr. (w/o attachments)
Old Dominion Electric Cooperative
Innsbrook Corporate Center
4201 Dominion Blvd.
Suite 300
Glen Allen, Virginia 23060

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Leslie N. Hartz, who is Vice President - Nuclear Engineering, of Virginia Electric and Power Company. She has affirmed before me that she is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of her knowledge and belief.

Acknowledged before me this 29th day of November, 2001.

My Commission Expires: March 31, 2004.



Notary Public

(SEAL)

Attachment

**Proposed QA Topical Report change
Response to Request for Additional Information
Section 5.0: Discussion of Change LA.6**

**Virginia Electric and Power Company
(Dominion)**

North Anna Power Station Units 1 and 2

North Anna Power Station
Units 1 and 2
Improved TS Review Comments – NRC QA Branch
ITS Chapter 5.0, Administrative Controls

5.0 Administrative Controls

5.0-01

NRC RAI: Comment: A revised (or marked up) Quality Assurance (QA) Topical Report, incorporating the proposed relocation of administrative Current Technical Specifications (CTS), should be submitted for review in conjunction with the proposed technical specification changes.

Response: The company will take the action proposed in the Comment. The marked up pages for the QA Topical Report change are provided for review.

LIST OF FIGURES (APPENDIX A)

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NORTH ANNA POWER STATION
 NUCLEAR SAFETY REVIEW
 (APPENDIX C)

SECTION	TITLE
A	MANAGEMENT SAFETY REVIEW COMMITTEE (MSRC)
B	STATION NUCLEAR SAFETY AND OPERATING COMMITTEE (SNSOC)
C	STATION NUCLEAR SAFETY (SNS)

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1. Management Safety Review Committee (MSRC)

The MSRC is the body which performs the offsite safety review function. It reports to the Senior Vice President - Nuclear Operations and Chief Nuclear Officer and provides an independent review in the areas of station operations, maintenance, reactivity management, engineering, chemistry & radiochemistry, radiological safety, quality assurance practices, and emergency preparedness. The Technical Specifications of each station further define the function, composition, alternates, consultants, meeting frequency, quorum, reviews, audits, authority and records of this committee.

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One of the functions of the MSRC is to oversee the Safety Evaluation Program to ensure that it is effective in identifying unreviewed safety questions. The MSRC accomplishes this function by reviewing a sample of approved safety evaluations to ensure that unreviewed safety questions are being properly identified and by conducting periodic assessments of the Safety Evaluation Program (References 4 and 5).

The review of a sample of safety evaluations uses a graded and safety significant approach to select safety evaluations for review. All safety evaluations are screened upon receipt, and the following criteria are used to select a sample for MSRC review:

- Safety evaluations for certain types of activities will receive a 100% review by the MSRC. These include, for example, safety evaluations for Technical Specification changes, justifications for continued operation and special tests.
- All safety evaluations for changes that have a high potential for impacting nuclear safety or regulatory requirements will be reviewed by the MSRC.
- A representative sample of safety evaluations will be reviewed from the remaining safety evaluations prepared. These safety evaluations will be selected to ensure a representative sample of safety evaluations of each type of activity has been reviewed in an amount consistent with program objectives. Provisions are also in place to adjust the sample sizes of the safety evaluations based on MSRC and assessment findings.

2. Nuclear Oversight Board (NOB)

The NOB functions to provide independent review and oversight of nuclear activities at the senior management level and in an advisory capacity to the Senior Vice President - Nuclear Operations and Chief Nuclear Officer. The NOB reviews nuclear management practices, policy issues, regulatory and performance trends

Insert #1:

for Surry Power Station and Appendix C for North Anna Power Station

and organizational factors relating to nuclear activities, and provides program oversight through management reports, document reviews, group discussions, and individual experience. Membership consists of senior nuclear utility executives and other members appointed on the basis of industry knowledge and/or expertise.

B. Vice President Nuclear Operations

The Vice President Nuclear Operations is the Corporate individual responsible to the Senior Vice President - Nuclear Operations and Chief Nuclear Officer for the operation of the Nuclear Stations and ISFSIs. He has overall responsibility for implementing the quality assurance program for the operational phase of the Nuclear Stations and ISFSIs.

1. Site Vice President

Responsible to the Vice President Nuclear Operations for the overall safe and efficient operation of the station and ISFSI, and for the implementation of quality assurance requirements in the areas specified by the operational quality assurance program. The Site Vice President has supervisory control over all Virginia Electric and Power Company personnel within the station organization and administrative control over all other Company and non-Company individuals within the nuclear site's boundary. The Site Vice President is the local representative of Company management and is empowered to implement all Company policy with regard to operations of the facility, support of Company public relations policy, and employee relations policies. The Site Vice President is also responsible for coordinating station functions with offsite (Company and non-Company) agencies and services, and ensuring station personnel are adequately trained in accordance with the Emergency Plan. The Site Vice President fulfills the position of Plant Manager identified in the ISFSI Technical Specifications.

In the absence of the Site Vice President, these duties will be assumed by the Director Station O&M (Operations and Maintenance) unless otherwise designated in writing.

a. Station Nuclear Safety and Operating Committee

Serves in an advisory capacity to the Site Vice President. ~~The technical specifications of each station define the responsibilities of this committee.~~ The Station Nuclear Safety and Operating Committee is separate from operational quality assurance activities in that its authority and responsibilities are not established by the Operational Quality Assurance Program. However, since the prime responsibility of this committee is to provide a continuing review of the operational and safety aspects of the station, it does perform a quality assurance function. [▲]

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Appendix C defines the function, composition, alternates, meeting frequency, quorum, responsibilities, authority, and records for this committee for the North Anna Power Station. Surry Power Station Technical Specifications contain the requirements for this committee at the Surry Power Station.

The Supervisor Nuclear Shift Operations must possess a valid Senior Reactor Operator (SRO) license, and may only be relieved by an individual who possesses a valid SRO license. This position fulfills the function of the “operations manager” as described in ANS 3.1 (12/79 Draft).

b.2 Manager Nuclear Maintenance

The Manager Nuclear Maintenance reports directly to the Director Station O&M and is responsible for directing and coordinating the maintenance activities at the station and ISFSI. He is responsible for: 1) ensuring that station and ISFSI facilities and equipment are maintained in accordance with regulatory requirements and station procedures, 2) the development and implementation of uniform policies and procedures for installation, maintenance, and repair of station and ISFSI equipment and systems, 3) ensuring maintenance tasks will be performed in a timely and efficient manner, 4) participating as a member of the SNSOC.

The Supervisors Nuclear Maintenance (Electrical and Mechanical), Supervisor Instrumentation & Control, as well as the Maintenance Coordinator report to the Manager Nuclear Maintenance.

b.3 Manager Nuclear Outage & Planning

The Manager Nuclear Outage & Planning reports directly to the Director Station O&M. He is responsible for the overall planning and scheduling of maintenance and maintenance-related work activities such that safe and reliable plant operation is optimized. The Manager Nuclear Outage & Planning is also responsible for detailed maintenance planning to support scheduled outages being completed as needed. He is also responsible for the execution of outages, maintenance of plant equipment history, and monitoring of station performance.

c. Director Station S&L (Safety and Licensing)

Responsible to the Site Vice President for directing and coordinating nuclear safety issues at the station and ISFSI. The Director Station S&L is the Chairman of the Station Nuclear Safety and Operating Committee (SNSOC) and conducts periodic meetings to ensure compliance with station technical specifications, manage licensing activities within the station, interface with Corporate management on operating experience and licensing issues, manage station procedures, administer the station environmental compliance program, and manage station safety and loss prevention. The Director Station S&L is independent of cost and scheduling concerns associated with operations,

maintenance, and modification activities. He is responsible for maintaining information on industry operating experience, being cognizant of licensing and regulatory issues, administering the Commitment Tracking System (CTS), administering the nuclear safety assessment and Shift Technical Advisor (STA) programs, coordinating the station quality inspection program, and coordinating activities related to non-radiological environmental protection.

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d. Manager Site Services

Responsible to the Site Vice President for directing all aspects of assigned projects including coordination of activities with station management, engineering, and construction.

e. Manager Radiological Protection

Responsible to the Site Vice President for administering the Radiological Protection Program at the station and ISFSI. Responsibilities include: 1) monitor the radiological effluent programs and personnel radiation protection programs, 2) maintain records of radiological exposures for all persons working or visiting within the station's restricted area, 3) ensure regular surveys of the station, 4) maintain records of background radiation levels, and 5) check all radioactive material releases and shipments from station and maintain appropriate records. The Radiological Protection group is responsible for determining the radiation levels of all work areas, and posting, as needed, areas where sources of radiation exist. Additionally, the Manager Radiological Protection is also responsible for managing the primary and secondary plant chemistry programs.

The Manager Radiological Protection directs the activities of his group to minimize the exposure of station personnel to excessive doses of radiation and to prevent the spread of radioactive contamination. All activities in these areas are coordinated with other station groups to ensure full awareness of problems through implementation of the station ALARA program.

The Supervisor Health Physics Operations, Supervisor Health Physics Technical Services, and Supervisor Nuclear Chemistry, report to the Manager Radiological Protection.

The Manager Radiological Protection also participates as a member of the SNSOC.

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(See Appendix C for the Station Nuclear Safety organization for the North Anna Power Station)

NAPS UFSAR
SPS UFSAR

APPENDIX C
NORTH ANNA POWER STATION
NUCLEAR SAFETY REVIEW

A. Management Safety Review Committee (MSRC) Structure and Responsibilities

1. Function

The MSRC shall function to provide independent review of designated activities in the areas of:

- a. Station Operations
- b. Maintenance
- c. Reactivity Management
- d. Engineering
- e. Chemistry and Radiochemistry
- f. Radiological Safety
- g. Quality Assurance Practices
- h. Emergency Preparedness

2. Composition

The MSRC shall be composed of the MSRC Chairman and a minimum of four MSRC members. The Chairman and all members of the MSRC shall have qualifications that meet the requirements of Section 4.7 of ANSI/ANS 3.1-1979 Rev. 1 (Draft).

3. Alternates

All alternate members shall be appointed in writing by the MSRC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in MSRC activities at any one time.

4. Consultants

Consultants should be utilized as determined by the MSRC Chairman to provide expert advice to the MSRC.

5. Meeting Frequency

The MSRC shall meet at least once per calendar quarter.

6. Quorum

The minimum quorum of the MSRC necessary for the performance of the MSRC review and audit functions shall consist of the Chairman or his designated alternate and at least 50% of the MSRC members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

7. Review

In addition to the reviews discussed in 17.2.1.2.A.1 the MSRC shall be responsible for the review of:

- a. Proposed changes to procedures, equipment or systems that require a license amendment pursuant to 10 CFR 50.59 (c).
- b. Proposed tests or experiments that require a license amendment pursuant to 10 CFR 50.59 (c).
- c. Proposed changes to the Technical Specifications or the Operating License.
- d. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- e. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.
- f. Events requiring written notification to the Commission.
- g. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
- h. A representative sample of reports and meeting minutes of the Station Nuclear Safety and Operating Committee (SNSOC).

8. Audits

Audits of facility activities shall be performed under the cognizance of the MSRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the entire facility staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50.
- e. Any other area of facility operation considered appropriate by the MSRC or the Vice President – Nuclear Operations.
- f. The Fire Protection Program and implementing procedures.
- g. An independent fire protection and loss prevention inspection and audit shall be performed utilizing an outside qualified fire consultant.
- h. The Offsite Dose Calculation Manual and implementing procedures.

9. Authority

The MSRC shall report to and advise the Senior Vice President – Nuclear Operations and Chief Nuclear Officer on those areas of responsibility specified in Sections A.7 and A.8.

10. Records

Records of MSRC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each MSRC meeting shall be prepared, approved and forwarded to the Senior Vice President – Nuclear Operations and Chief Nuclear Officer within 14 days of each meeting.
- b. Reports of reviews with safety significant findings encompassed by Section A.7 above, shall be prepared, approved and forwarded to the Senior Vice President – Nuclear Operations and Chief Nuclear Officer within 14 days following completion of the review.
- c. Audit reports encompassed by Section A.8 above, shall be prepared, approved and forwarded to the Senior Vice President – Nuclear Operations and Chief Nuclear Officer and to the management positions responsible for the areas within 30 days after completion of the audit by the auditing organization.

B. Station Nuclear Safety and Operating Committee (SNSOC) Structure and Responsibilities

1. Function

The SNSOC shall function to advise the Site Vice President on all matters related to nuclear safety.

2. Composition

The SNSOC shall be composed of the:

Chairman: Director, Station Safety and Licensing

Vice Chairman and Member: Director, Station Operations and Maintenance

Member: Manager – Nuclear Operations

Member: Manager – Maintenance

Member: Manager – Radiological Protection

Member: Manager – Nuclear Site Engineering

3. Alternates

All alternate members shall be appointed in writing by the SNSOC Chairman to serve on a temporary basis; however, no more than one alternate shall participate as a voting member in SNSOC activities at any one time.

4. Meeting Frequency

The SNSOC shall meet at least once per calendar month and as convened by the SNSOC Chairman or his designated alternate.

5. Quorum

A quorum of the SNSOC shall consist of the Chairman or Vice Chairman and two members including alternates.

6. Responsibilities

The SNSOC shall be responsible for:

- a. Review of 1) all new procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, 2) all procedure changes that require a regulatory evaluation, 3) all programs required by Technical Specification 5.5 and changes thereto, and 4) any other procedures and changes thereto as determined by the Site Vice President to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- d. Review of proposed changes to Appendix "A" Technical Specifications and Appendix "B" Environmental Protection Plan. Recommended changes shall be submitted to the Site Vice President.
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President – Nuclear Operations and to the Management Safety Review Committee (MSRC).
- f. Review all Reportable Events and Special Reports.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the SNSOC or Site Vice President.
- i. Review of every unplanned onsite release of radioactive material to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President – Nuclear Operations and to the MSRC.
- j. Review of changes to the Offsite Dose Calculation Manual.
- k. Review of the Fire Protection Program and implementing procedures and shall submit recommended changes to the Site Vice President.

7. Authority

The SNSOC shall:

- a. Provide written approval or disapproval of items considered under Section 6.a through 6.c above. SNSOC approval shall be certified in writing by the Director, Station Safety and Licensing or the Director, Station Operations and Maintenance.
- b. Render determinations in writing with regard to whether or not each item considered under Section 6.a through 6.e above constitutes a need to request a License Amendment.
- c. Provide written notification within 24 hours to the Vice President – Nuclear Operations and to the MSRC of disagreement between the SNSOC and the Site Vice President; however, the Site Vice President shall have responsibility for resolution of such disagreement.

8. Records

The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the Site Vice President, Vice President – Nuclear Operations, and the MSRC.

C. Station Nuclear Safety (SNS) Structure and Responsibilities:

a. Function

SNS shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources which may indicate areas for improving plant safety.

b. Composition

SNS shall be composed of at least five dedicated, full-time engineers located onsite.

c. Responsibilities

SNS shall be responsible for maintaining surveillance of plant activities to provide independent verification, not including responsibility for sign off functions, that these activities are performed correctly and that human errors are reduced as much as practical.

SNS shall disseminate relevant operational experience.

d. Authority

SNS shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Director, Station Safety and Licensing.