

June 26, 2002

Mr. David A. Christian  
Senior Vice President - Nuclear  
Virginia Electric and Power Company  
Innsbrook Technical Center  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2 - IMPROVED TECHNICAL SPECIFICATIONS: CORRECTION OF ADMINISTRATIVE ERROR (TAC NOS. MB5249 AND MB5250)

Dear Mr. Christian:

The purpose of this letter is to provide you with the corrected Improved Technical Specifications (ITS) page 3.3.1-17.

By letter dated April 5, 2002, the staff issued License Amendment Nos. 231 and 212 for the North Anna Power Station Units 1 and 2, respectively. This amendment converted the current Technical Specifications (CTS) to Improved Technical Specifications (ITS) based upon the instructions of NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1, dated April 1995. By letter dated May 28, 2002, Virginia Electric and Power Company identified an administrative error on ITS page 3.3.1-17, Table 3.3.1-1, "Reactor Trip System Instrumentation" involving the plant-specific reactor trip setpoint for Overpower Delta T.

CTS Table 2.2-1, "Reactor Trip Instrumentation Trip Setpoints Notation," provides the formula for calculating the trip setpoint for Overpower Delta T. Included in this formula is the variable  $T_3$ , which is defined as the time constant value of 10 seconds that is utilized in the rate lag controller for  $T_{avg}$ .  $T_3$  is used to determine the value of the function generated by the lag controller for the  $T_{avg}$  dynamic compensation. NUREG-1431, Rev. 1, Table 3.3.1-1, page 3.3-22, note 2 provides a formula to calculate the Overpower Delta T reactor trip setpoint. However, NUREG-1431, Rev. 1 uses the variable  $T_7$  to determine the value of the function generated by the lag controller for the  $T_{avg}$  dynamic compensation instead of the variable  $T_3$ .  $T_7$  was given a value of  $\geq 10$  seconds. NUREG-1431, Rev. 1 introduces a variable  $T_3$ , which is defined as  $\leq 2$  seconds, to adjust the value of the reactor coolant system temperature change. By letter dated May 28, 2002, you indicated when converting from CTS to ITS you had inadvertently adopted the inequality sign convention of  $T_3$  from NUREG-1431, Rev. 1 instead of the inequality sign convention of  $T_7$ . This error was confirmed by your application for ITS conversion dated December 11, 2000, which is identified as the origin of this error.

The correction of this error does not change the Safety Evaluation for the April 5, 2002, license amendment. In addition, this change was not addressed as a Beyond-Scope Change in the Notice of Consideration of Issuance of Amendments to Facility Operating Licenses and Opportunity for a Hearing published in the *Federal Register* on February 26, 2002 (67 FR 8827), nor did the notice otherwise specifically identify it. The licensee did request, in the ITS conversion, that the value of  $T_3$  be removed from the TS, and that a lower limit for  $T_3$  be specified in the Core Operating Limits Report (COLR). While the NRC staff reviewed the proposal to place the appropriate value in the COLR, rather than the TS, the staff did not review the associated inequality sign convention. Based on the foregoing, the staff is correcting this inadvertent error.

The corrected ITS page 3.3.1-17 is enclosed.

Sincerely,

*/RA/*

Stephen R. Monarque, Project Manager, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-338 and 50-339

Enclosure: ITS page 3.3.1-17

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