

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261
September 15, 2004

Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 04-273
NL&OS/SWT R0"
Docket No. 72-16
License No. SNM-2507

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI)
PROPOSED TECHNICAL SPECIFICATION CHANGE
ADMINISTRATIVE CONTROLS CHANGES

Pursuant to 10 CFR 72.56, Virginia Electric and Power Company (Dominion), requests amendments, in the form of revisions to the Technical Specifications to License Number SNM-2507 for the North Anna Independent Spent Fuel Storage Installation (ISFSI). The proposed changes are administrative in nature and will change Section 5.0, Administrative Controls, of the current Technical Specifications (TS). The revision will change the reference location where the plant-specific titles and TS titles are correlated and relocate to the Quality Assurance Program facility staff qualification requirements. A discussion of the proposed Technical Specifications changes is provided in Attachment 1. The proposed Technical Specifications changes are provided as a mark-up in Attachment 2 and a typed version in Attachment 3.

The proposed changes to the North Anna ISFSI TS are also applicable to the North Anna Power Station TS. Dominion is submitting the proposed North Anna Power Station TS changes under separate cover letter (Serial No. 04-325) dated September 15, 2004. As the changes are applicable to multiple dockets and are similar to administrative changes proposed for North Anna Power Station, Dominion requests that the NRC review of the attached license amendment request be coordinated with the power station amendment request and Topical Report review, in order to facilitate an efficient and consistent review.

The proposed Technical Specifications changes have been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee. It has been determined that the proposed Technical Specifications changes do not involve a safety concern. The basis for our determination that the changes do not involve a safety concern is provided in Attachment 1.

Should you have any questions or require additional information, please contact Sheri Tew at (804) 741-2368.

Very truly yours,



Leslie N. Hartz
Vice President Nuclear Engineering

Commitments made in this letter:

1. There are no commitments made in this letter.

Attachments:

- 1 Discussion of Changes
- 2 Mark-Up of Technical Specifications
- 3 Proposed Technical Specifications

cc: **Mr. J. R. Strosnider, Director**
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

U.S. Nuclear Regulatory Commission
Region II
Atlanta Federal Center
61 Forsyth Street, SW
Suite 23T85
Atlanta, Georgia 30303

Ms. M. J. Ross-Lee
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission, Mail Stop 06-F-18
Washington, D.C. 20555

Mr. M. T. Widmann
NRC Senior Resident Inspector
North Anna Power Station

Commissioner
Department of Radiological Health
Room 104A
1500 East Main Street
Richmond, VA 23219

Attachment 1
Discussion of Changes

Dominion
North Anna Power Station ISFSI

DISCUSSION OF CHANGES

Introduction

Pursuant to 10 CFR 72.56, Virginia Electric and Power Company (Dominion), requests amendments, in the form of revisions to the Technical Specifications to License Number SNM-2507 for the North Anna Independent Spent Fuel Storage Installation (ISFSI). The proposed changes are administrative in nature and will change Section 5.0, Administrative Controls, of the current Technical Specifications (TS). The revision will change the reference location where the plant-specific titles and TS titles are correlated and relocate to the Quality Assurance Program facility staff qualification requirements.

Background

Consistent with 10 CFR 50 Appendix B requirements, the Nuclear organization and associated position responsibilities are delineated in the Quality Assurance Program (Current UFSAR Chapter 17.2.1, Organization). In addition, the current Technical Specifications Section 5.0, Administrative Controls, delineates organization responsibilities. These changes will remove qualification requirements for facility staff from TS since they are also contained in the QA Program (Topical Report). In addition, these changes reflect the relocation of the cross-reference between TS functional titles and plant-specific titles from the UFSAR/Quality Assurance Plan to administrative documents.

Description of Proposed TS Revisions

Attachment 2 contains a mark-up of the specific changes. A discussion of the specific changes is provided below.

- TS 5.2.1.a. The current TS states that the plant-specific titles of personnel fulfilling the responsibilities of the positions delineated in the TS shall be documented in the SAR or QA Program (Topical Report). This TS is being changed to state that these titles will be maintained in appropriate administrative documents.

- TS 5.3.1 The QA Program specifies the training requirements to be met for the facility staff and therefore they are deleted from the current TS. Specifically, reference to ANSI 3.1 (12/79 Draft) and Regulatory Guide 1.8 will be deleted.

Safety Implications of the Proposed Change

The proposed changes are administrative in nature and without impact on plant safety. The changes will revise the location where the plant-specific titles and TS titles are correlated and relocate to the Quality Assurance Program facility staff qualification requirements. The management reporting structure has not changed and therefore the response to an accident situation has not changed. There are no changes to the facility staff training requirements. There are no changes to the multiple barriers between the fuel and the environment. There are no changes to the decay heat removal from the fuel. There are no changes to the required subcritical margin during normal, off-normal and accident conditions. There are no changes to the radiation shielding to limit exposures to both operators and the general public. There are no changes to the retrievability of the fuel under normal, off-normal and accident conditions. Therefore, the proposed changes to the Administrative Controls sections of the Technical Specifications do not create a safety concern.

Conclusion

The Station Nuclear Safety and Operating Committee (SNSOC) and the Management Safety Review Committee (MSRC) have reviewed this proposed amendment and concur that operation with the proposed changes does not involve a safety concern and will not result in an undue risk to the health and safety of the public.

6.0 References

- 6.1 North Anna QA Program (Topical Report), UFSAR Chapter 17.2.1, Organization.
- 6.2 10 CFR 50 Appendix B

Attachment 2

Mark-up of Technical Specifications

**Dominion
North Anna Power Station ISFSI**

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for facility operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the ISFSI.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Safety Analysis Report or the Virginia Electric and Power Company Operational Quality Assurance Program Topical Report, maintained in appropriate administrative documents;
- b. The plant manager shall be responsible for overall safe operation of the facility and shall have control over those onsite activities necessary for safe operation and maintenance of the facility;
- c. The responsible corporate executive shall have corporate responsibility for overall facility nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the facility to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

Shall be documented in the Quality Assurance Program.

5.0 ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications ~~of ANS 3.1 (12/79 Draft) for comparable positions except that the Superintendent - Radiological Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. Additional exceptions are specified in the Virginia Electric and Power Company Operational Quality Assurance Program (Topical Report).~~

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Attachment 3

Proposed Technical Specifications

Dominion

North Anna Power Station ISFSI

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for facility operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the ISFSI.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Program. The plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be maintained in appropriate administrative documents;
 - b. The plant manager shall be responsible for overall safe operation of the facility and shall have control over those onsite activities necessary for safe operation and maintenance of the facility;
 - c. The responsible corporate executive shall have corporate responsibility for overall facility nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the facility to ensure nuclear safety; and
 - d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.
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5.0 ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications as specified in the Quality Assurance Program. |

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