



December 21, 2004

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

Serial No.: 04-738  
NL&OS/ETS: R0  
Docket Nos: 50-245/336  
50-423  
50-338/339  
50-280/281  
License Nos: DPR-21/65  
NPF-49  
NPF-4/7  
DPR-32/37

**DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**  
**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**  
**MILLSTONE POWER STATION UNITS 1, 2, AND 3**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**SURRY POWER STATION UNITS 1 AND 2**  
**APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO**  
**ELIMINATE REQUIREMENTS TO PROVIDE MONTHLY OPERATING**  
**REPORTS AND OCCUPATIONAL RADIATION EXPOSURE REPORTS**

Pursuant to 10 CFR 50.90, DNC and Dominion hereby request amendments to the Technical Specifications (TS) for Millstone Power Station Units 1, 2, and 3, Surry Power Station Units 1 and 2, and North Anna Power Station Units 1 and 2. The proposed amendment deletes the TS requirements to submit monthly operating reports and occupational radiation exposure reports. The proposed change is consistent with NRC-approved Revision 1 to Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report."

The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIIP). Attachment 1 provides a description of the proposed change and confirmation of applicability. Attachment 2 provides a mark-up of the existing TS pages indicating the proposed change and Attachment 3 provides the re-typed pages.

DNC and Dominion request approval of the proposed license amendment by June 2005, with the amendment being implemented within 90 days of approval.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the appropriate designated officials of Connecticut and Virginia.

If you should have any questions regarding this submittal, please contact Mr. Thomas Shaub at (804) 273-2763.

Very truly yours,



William R. Matthews  
Senior Vice President – Nuclear Operations  
Dominion Nuclear Connecticut, Inc.  
Virginia Electric And Power Company

Commitments made in this letter to be effective upon implementation of proposed license amendment:

1. Using an industry database provide operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," to the NRC by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC [i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)].
2. DNC is making a regulatory commitment to provide information to the NRC annually (e.g. with the annual submittal in accordance with 10 CFR 20.2206) to support the apportionment by the NRC of station doses and personnel to each type of reactor and to differentiate between operating and shutdown units. Specifically, DNC will provide the dose data required per 10 CFR 20.2206, the total person-rem for each unit and the number of personnel monitored at each unit as previously provided by the Regulatory Guide 1.16 report.

Attachments:

1. Discussion of Change
2. Marked-up Technical Specifications Pages
3. Revised Technical Specifications Pages

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**Attachment 1**

**Serial No. 04-738**

**North Anna Power Station Units 1 and 2  
Surry Power Station Units 1 and 2  
Millstone Power Station Units 1, 2 and 3**

**Proposed Technical Specification Changes For  
Removal of Monthly Operating Report and  
Occupational Radiation Exposure Report**

**Discussion of Change**

**Virginia Electric and Power Company (Dominion)  
Dominion Nuclear Connecticut, Inc. (DNC)**

## Discussion of Change

### 1.0 INTRODUCTION

The proposed License amendments delete the requirements in Technical Specifications (TS) for an annual report on occupational radiation exposures and a monthly report of operating statistics and shutdown experience. Amendments are being proposed by Virginia Electric and Power Company (Dominion) for North Anna and Surry Power Stations and Dominion Nuclear Connecticut, Inc. (DNC) for Millstone Power Station.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specification improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067), as part of the consolidated line item improvement process (CLIP).

### 2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

#### Millstone Unit 1

TS 5.7.1, Occupational Radiation Exposure Report Deleted

#### Millstone Unit 2

TS 6.9.1.5a, Occupational Radiation Exposure Report Deleted  
TS 6.9.1.5d, PORV and Safety Valve Challenges Deleted  
TS 6.9.1.7, Monthly Operating Reports Deleted

#### Millstone Unit 3

TS 6.9.1.2a, Occupational Radiation Exposure Report Deleted  
TS 6.9.1.2c, PORV and Safety Valve Challenges Deleted  
TS 6.9.1.5, Monthly Operating Reports Deleted

#### North Anna Units 1 and 2

TS 5.6.1, Occupational Radiation Exposure Report Deleted  
TS 5.6.4, Monthly Operating Reports Deleted

#### Surry Units 1 and 2

TS 6.6.A.2.a, Occupational Radiation Exposure Report Deleted  
TS 6.6.A.3, Monthly Operating Reports Deleted

As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, Surry and Millstone Units 2 and 3 are proposing to adopt a part of NRC-approved Revision 4 to TSTF-258, "Changes to Section 5.0, Administrative Controls." TS 6.6.3 for Surry Units 1 and 2 includes a requirement to include in the monthly operating reports any challenges to pressurizer power operated relief valves or pressurizer safety valves for pressurized water reactors and TS 6.9.1.5d and TS 6.9.1.2c for Millstone Units 2 and 3, respectively, require reporting any challenges to the power operated relief valves and safety valves annually. The NRC model safety evaluation addressed the removal of requirements to submit monthly operating reports in those cases where the TS includes a requirement to address challenges to relief and safety valves (i.e., if a licensee had not yet adopted the associated part of TSTF-258). The proposed changes for Surry Units 1 and 2 and Millstone Units 2 and 3 are consistent with the option described in the Notice of Availability published on June 23, 2004 (69 FR 35067) and the related documentation for both TSTF-369 and the limited portion of TSTF-258 included in this application.

As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, the removal of the TSs for the Monthly Operating Report and/or Occupational Radiation Exposure Report, resulted in various editorial and formatting changes such as the renumbering of TS sections. These changes reflect the renumbering of TS sections, but do not revise technical or administrative requirements.

In addition, Millstone Power Station has both boiling and pressurized water reactors and operating and shutdown reactors. As addressed in the Notice of Availability for TSTF-369, DNC has included in this application a regulatory commitment to support the NRC need to apportion doses reported under 10 CFR Part 20 to the different categories of reactors at the site for Millstone Power Station.

### **3.0 BACKGROUND**

The background for these applications is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

### **4.0 REGULATORY REQUIREMENTS AND GUIDANCE**

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

### **5.0 TECHNICAL ANALYSIS**

Dominion and DNC have reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. Dominion and DNC have concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff 1) are applicable to North Anna Units 1 and 2, Surry Units 1 and 2 and Millstone Units 1, 2 and 3, and 2) justify these amendments for the incorporation of these changes to the North Anna, Surry and Millstone Units' Technical Specifications.

## **6.0 REGULATORY ANALYSIS**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

### **6.1 Verification and Commitments**

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, Dominion and DNC are making the following regulatory commitments:

1. Dominion and DNC are making regulatory commitments for North Anna Units 1 and 2, Surry Units 1 and 2 and Millstone Units 2 and 3 to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports or CDE)).
2. North Anna and Surry Power Station have similar reactor types and the units are operating. Millstone Power Station has different reactor types and operating and shutdown reactors. Therefore, DNC is making a regulatory commitment to provide information to the NRC annually (e.g. with the annual submittal in accordance with 10 CFR 20.2206) to support the apportionment by the NRC of station doses and personnel to each type of reactor and to differentiate between operating and shutdown units. Specifically, DNC will provide the dose data required per 10 CFR 20.2206, the total person-rem for each unit and the number of personnel monitored at each unit as previously provided by the Regulatory Guide 1.16 report.

## **7.0 NO SIGNIFICANT HAZARDS CONSIDERATION**

Dominion and DNC have reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIIP. Dominion and DNC have concluded that the proposed determination presented in the notice is applicable to the North Anna, Surry and Millstone plants, and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

## **8.0 ENVIRONMENTAL EVALUATION**

Dominion and DNC have reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIIP. Dominion and DNC have concluded that the staff's findings presented in that evaluation are applicable to

North Anna Units 1 and 2, Surry Units 1 and 2 and Millstone Units 1, 2 and 3, and the evaluation is hereby incorporated by reference for this application.

## **9.0 PRECEDENT**

This application is being made in accordance with the CLIP. Dominion and DNC are not proposing variations or deviations from the TS changes described in TSTF-369 and the limited portion of TSTF-258 for Surry Units 1 and 2 and Millstone Units 2 and 3 or the NRC staff's model SE published on June 23, 2004 (69 FR 35067).

## **10.0 REFERENCES**

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).

**Attachment 2**

**Serial No. 04-738**

**Millstone Power Station Units 1, 2 and 3  
North Anna Power Station Units 1 and 2  
Surry Power Station Units 1 and 2**

**Proposed Technical Specification Changes For  
Removal of Monthly Operating Report and  
Occupational Radiation Exposure Report**

**Marked-up Pages**

**Virginia Electric and Power Company (Dominion)  
Dominion Nuclear Connecticut, Inc. (DNC)**

## **Millstone Unit 1**

5.0 ADMINISTRATIVE CONTROLS

5.7 Reporting Requirements

The following reports shall be submitted in accordance with 10CFR50.4.

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5.7.1 Occupational Radiation Exposure Report

NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR Part 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

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(continued)

## Millstone Unit 2

**ADMINISTRATIVE CONTROLS**

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ADMINISTRATIVE CONTROLS

ANNUAL REPORTS<sup>1</sup>

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted in accordance with 10 CFR 50.4

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6.9.1.5a. OCCUPATIONAL RADIATION EXPOSURE REPORT

- NOTE -

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station

A tabulation, on an annual basis of the number of station, utility and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 each year.

6.9.1.5b The complete results of steam generator tube inservice inspections performed during the report period (reference Specification 4.4.5.1.5.b). The report covering the previous calendar year shall be submitted prior to March 1 of each year.

6.9.1.5c. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit. The report covering the previous calendar year shall be submitted prior to March 1 of each year.

<sup>1</sup> A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

May 15, 2003

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ADMINISTRATIVE CONTROLS

~~6.9.1.5d Documentation of all failures (inability to lift or reclose within the tolerances allowed by the design basis) and challenges to the pressurizer PORVs or safety valves. The report covering the previous calendar year shall be submitted prior to March 1 of each year.~~

ANNUAL RADIOLOGICAL REPORTS

6.9.1.6a ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODOCM), and in 10 CFR Part 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the REMODOCM, as well as summarized and tabulated results of these analyses and measurements. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in the next annual report.

6.9.1.6b RADIOACTIVE EFFLUENT RELEASE REPORT

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the REMODOCM and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.I.

MONTHLY OPERATING REPORT

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6.9.1.7 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, one copy to the Regional

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## ADMINISTRATIVE CONTROLS

~~MONTHLY OPERATING REPORT (Con't)~~

~~Administrator, Region I, and one copy to the NRC Resident Inspector, no later than the 15th of each month following the calendar month covered by the report.~~

## CORE OPERATING LIMITS REPORT

6.9.1.8 a. Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle.

3/4.1.1.1	SHUTDOWN MARGIN (SDM)
3/4.1.1.4	Moderator Temperature Coefficient
3/4.1.3.6	Regulating CEA Insertion Limits
3/4.2.1	Linear Heat Rate
3/4.2.3	Total Integrated Radial Peaking Factor - $F_r^T$
3/4.2.6	DNB Margin

b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

- 1) EMF-96-029(P)(A) Volumes 1 and 2, "Reactor Analysis System for PWRs Volume 1 - Methodology Description, Volume 2 - Benchmarking Results," Siemens Power Corporation.
- 2) ANF-84-73 Appendix B (P)(A), "Advanced Nuclear Fuels Methodology for Pressurized Water Reactors: Analysis of Chapter 15 Events," Advanced Nuclear Fuels.
- 3) XN-NF-82-21(P)(A), "Application of Exxon Nuclear Company PWR Thermal Margin Methodology to Mixed Core Configurations," Exxon Nuclear Company.
- 4) XN-75-32(P)(A) Supplements 1 through 4, "Computational Procedure for Evaluating Fuel Rod Bowing," Exxon Nuclear Company.
- 5) EFN-2328(P)(A), "PWR Small Break LOCA Evaluation Model S-RELAP5 Based," Framatome ANP.
- 6) EMF-2087(P)(A), "SEM/PWR-98: ECCS Evaluation Model for PWR LBLOCA Applications," Siemens Power Corporation.
- 7) XN-NF-44(NP)(A), "A Generic Analysis of the Control rod Ejection Transient for Pressurized water reactors," Exxon Nuclear Company.

## **Millstone Unit 3**

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ADMINISTRATIVE CONTROLS

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS\*

6.9.1.2 Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted in accordance with 10 CFR 50.4.

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6.9.1.2a. OCCUPATIONAL RADIATION EXPOSURE REPORT

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrems and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totalling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

delete

6.9.1.2b. The results of specific activity analyses in which the reactor coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration ( $\mu\text{Ci/gm}$ ) and one other radioiodine isotope concentration ( $\mu\text{Ci/gm}$ ) as a function of time for the

\* A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the reactor coolant exceeded the radioiodine limit. The report covering the previous calendar year shall be submitted prior to March 1 of each year.

~~6.9.1.2c. Documentation of all challenges to the pressurizer power-operated relief valves (PORVs) and safety valves. The report covering the previous calendar year shall be submitted prior to March 1 of each year.~~

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6.9.1.3 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

----- NOTE -----

A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODOCM), and in 10 CFR Part 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the REMODOCM, as well as summarized and tabulated results of these analyses and measurements. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in the next annual report.

6.9.1.4 RADIOACTIVE EFFLUENT RELEASE REPORT

----- NOTE -----

A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the REMODOCM and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

ADMINISTRATIVE CONTROLS

MONTHLY OPERATING REPORTS

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~~6.9.1.5 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, one copy to the Regional Administrator Region I, and one copy to the NRC Resident Inspector, no later than the 15th of each month following the calendar month covered by the report.~~

delete

CORE OPERATING LIMITS REPORT

6.9.1.6 a Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:

1. Overtemperature  $\Delta T$  and Overpower  $\Delta T$  setpoint parameters for Specification 2.2.1,
2. Shutdown Margin for Specifications 3/4.1.1.1.1, 3/4.1.1.1.2, and 3/4.1.1.2,
3. Moderator Temperature Coefficient BOL and EOL limits and 300 ppm surveillance limit for Specification 3/4.1.1.3.



## **North Anna Units 1 and 2**

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrems and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions, e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

5.6.2 Annual Radiological Environmental Operating Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements commensurate with the format in the ODCM. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Annual Radioactive Effluent Release Report

-----NOTE-----  
A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.  
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The Annual Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

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5.6.4 Monthly Operating Reports

~~Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

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5.6.5 CORE OPERATING LIMITS REPORT (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

- 1. Safety Limits,
- 2. SHUTDOWN MARGIN,

(continued)