

SAFETY EVALUATION REPORT

Docket No. 72-16
Virginia Electric and Power Company
Materials License No. SNM-2507
Amendment No. 3

SUMMARY

By letter dated September 15, 2004, Virginia Electric and Power Company (Dominion) requested an amendment, in the form of revisions to the Technical Specifications (TS) to Materials License SNM-2507, for the North Anna Independent Spent Fuel Storage Installation (ISFSI). The proposed changes will revise Section 5.0, "Administrative Controls", of the current TS. The staff has completed its review and, based on the statements and representations in the application, finds that the proposed changes are acceptable.

General Information

In a September 15, 2004, letter, Virginia Electric and Power Company requested that the U.S. Nuclear Regulatory Commission (NRC) update the TS for the North Anna ISFSI. The request proposed changing the reference location where the plant-specific titles and TS titles are correlated, and relocating the facility staff qualification requirements to the Quality Assurance (QA) Program. This request required that the staff perform a review of the QA Program and verify that there are no safety impacts associated with the proposed changes.

Quality Assurance Review

The staff's review determined the acceptability of the proposed changes to Section 5.0, Administrative Controls of the TS for the North Anna ISFSI Materials License SNM-2507. The evaluation was performed by assessing the proposed changes against the requirements of 10 Code of Federal Regulations (CFR), Part 71, Subpart H and 10 CFR Part 72, Subpart G. NRC guidance (see References section) provided direction for evaluating the proposed changes to the current TS against 18 subject areas.

Staff reviewed the effects of the proposed changes on the following subjects:

- Organization
- Quality Assurance Program
- Design Control
- Procurement Document Control
- Instructions, Procedures, and Drawings
- Document Control
- Control of Purchased Material, Equipment, and Services
- Identification and Control of Items
- Control of Special Processes
- Inspection
- Test Control
- Control of Measuring and Test Equipment

Handling, Storage, and Shipping
Inspection, Test, and Operating Status
Nonconforming Materials, Parts, or Components
Corrective Action
Quality Records
Audits

Evaluation Findings

The proposed changes revise the Administrative Controls Section of the TS and the references to the QA Program and to the plant implementing procedures. No changes were proposed to the management reporting structure or the staff training requirements. The proposed changes do not involve unreviewed safety questions and do not impact plant safety.

The QA Program describes requirements, procedures, and controls that, when properly implemented, comply with requirements of 10 CFR Part 71 and 10 CFR Part 72. The structure of the organization and assignment of responsibility for each activity ensure that designated parties will perform procedures satisfactorily and maintain specified quality requirements.

The program's conformance to established requirements will be verified by qualified personnel and groups not directly responsible for the activity being performed. These personnel and groups report through a management hierarchy that grants the necessary authority and organizational freedom and provides sufficient independence from economic and scheduling influences.

Environmental Review

Pursuant to Title 10 Code of Federal Regulations Part 51, an Environmental Assessment is not required for this action as it is Categorically Excluded under the requirements of 10 CFR 51.22(c)(11).

Conclusion

The QA Program description is well-documented and provides adequate control over activities affecting quality, structures, systems, and other components important to safety. Based on the review of the proposed changes, the staff has determined that the proposed changes meet the requirements of Subpart H of 10 CFR Part 71 and Subpart G of 10 CFR Part 72. While this evaluation has determined that the QA Program is acceptable, continued proper implementation of the QA Program plan will be assessed during future NRC inspections.

Conditions for Cask Use - Technical Specifications

The materials license, Appendix A will be revised as follows:

Technical Specification 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). The TS is being changed to state that these titles will be maintained in the Quality Assurance program.

Technical Specification 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.

The staff has reviewed these changes, as discussed in the SER, and found them to be acceptable.

Issued with Special Nuclear Materials License No. SNM-2507, Amendment No. 3, on December 5, 2005.

References

1. NUREG-1567, "Standard Review Plan for Spent Fuel Dry Storage Facilities."
2. Regulatory Guide 7.10, Revision 1, "Establishing Quality Assurance Programs for Packaging used in the Transport of Radioactive Material Packaging."
3. U.S. Code of Federal Regulations, Title 10, Part 71, "Packaging and Transportation of Radioactive Material."
4. U.S. Code of Federal Regulations, Title 10, Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High Level Radioactive Waste, and Reactor-Related Greater than Class C Waste."