

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 30, 2006

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

Serial No. 06-320A
NL&OS/ETS R0
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

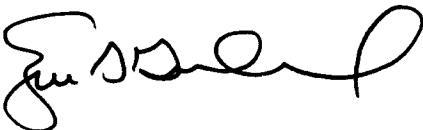
VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATIONS CHANGE
DIESEL FUEL OIL TESTING PROGRAM

In a May 8, 2006 letter (Serial No. 06-320) Virginia Electric and Power Company (Dominion) requested amendments, in the form of a change to the Technical Specifications (TS) to Facility Operating License Numbers NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively. The proposed change relocates the ASTM standard being used to test the total particulate concentration of the stored fuel oil to a licensee controlled program consistent with the intent of Technical Specifications Task Force (TSTF) Traveler 374-A, Rev 0, "Revision to TS 5.5.13 and Associated Bases for Diesel Fuel Oil." The testing standard will be incorporated into the TS Bases upon NRC's approval of the proposed amendment.

Subsequent to this submittal, it was noted that Attachments 2 and 3 had been inadvertently omitted during transmittal of the May 8, 2006 letter. This letter supercedes the May 8, 2006 letter in its entirety. Please use this letter to complete your review of this proposed Technical Specification change.

If you have any questions or require additional information, please contact Mr. Thomas Shaub at (804) 273-2763.

Very truly yours,



Eugene S. Grecheck
Vice President – Nuclear Support Services

Attachments

1. Discussion of Change
2. Mark-up of Unit 1 and Unit 2 Technical Specifications Change
3. Proposed Unit 1 and Unit 2 Technical Specifications Change

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission
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COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President – Nuclear Support Services, of Virginia Electric and Power Company. He has affirmed before me that he 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 his knowledge and belief.

Acknowledged before me this 30TH day of May, 2006.
My Commission Expires: May 31, 2006.

Vicki L. Hule
Notary Public

(SEAL)

Attachment 1
Discussion of Change

North Anna Power Station
Units 1 and 2
Virginia Electric and Power Company
(Dominion)

DISCUSSION OF CHANGE

Introduction

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company (Dominion) requests a change to Technical Specifications 5.5.12, "Diesel Fuel Oil Testing Program" to relocate the specific American Society for Testing and Materials (ASTM) standard used for particulate contamination testing of the stored fuel oil to a licensee-controlled document. The change is consistent with Technical Specification Task Force Improved Standard Technical Specifications Change Traveler (TSTF-374-A, Rev 0), "Revision to TS 5.5.13 and associated TS Bases for Diesel Fuel Oil." The testing standard will be incorporated into the TS Bases upon the NRC's approval of the proposed amendment and maintained in accordance with the Bases Control Program.

Design/Licensing Bases

The initial conditions of a Design Basis Accident and transient analysis assume Engineered Safety Function (ESF) systems are operable. The diesel generators are designed to provide capacity, capability, redundancy, and reliability to ensure the availability of necessary power to ESF systems so that nuclear fuel, Reactor Coolant System, and containment design limits are not exceeded. For proper operation of the diesel generators, it is necessary to ensure the proper quality and properties of the fuel oil. The diesel generator fuel oil properties governed by the Diesel Fuel Oil Testing Program (TS 5.5.12) are the water and sediment content, the kinematic viscosity, specific gravity or API gravity, and particulate level.

Discussion

Program Section 5.5.12 was added to the Technical Specifications during the conversion to the Improved Technical Specifications. The purpose of Section 5.5.12 was to establish a diesel fuel oil testing program that set specific limits and testing requirements for both new and stored diesel fuel oil. The program included sampling and testing requirements with acceptance criteria, in accordance with applicable ASTM Standards that support EDG operability. If these requirements and acceptance criteria are exceeded, they can cause a degradation of the EDG's capability.

The proposed change will adopt the intent of Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler (TSTF-374-A, Rev 0), "Revision to TS 5.5.13 (TS 5.5.12 at North Anna) and Associated Bases for Diesel Fuel Oil." The change will revise TS 5.5.12.c to relocate the ASTM Standard reference from the Technical Specification Administrative Section to a licensee-controlled document (Technical Specification Bases Section 3.8.3). The test frequency of 92 days will remain the same. This frequency is based upon the ITS submittal, whereby Justification for Deviation (Item 11) modified TS 5.5.12.c to add the word "stored" fuel oil and maintain the frequency for the EDG fuel oil testing at every 92 days. This frequency was based upon plant operating practice of conducting the surveillance every 92 days,

test history indicating that the interval was appropriate, and the fact that there were no Technical Specification requirements to perform this test.

In addition, North Anna elected not to adopt the performance of a “clear and bright” appearance with proper color test required by TS 5.5.12.a.3. In lieu of the “clear and bright” test, North Anna elected to require a water and sediment test ($\leq 0.05\%$) as part of determining acceptability of new fuel oil prior to its addition to the storage tanks. As stated in our Justification for Deviation (Item 10), the water and sediment test was adopted because the diesel oil used at North Anna is dyed. Therefore, this portion of TSTF-374-A Rev 1 will not be implemented with this change.

The Bases of Technical Specification (SR 3.8.3.2) states that particulate concentration should be determined in accordance with ASTM D2276–83. This method involves a gravimetric determination of total particulate concentration in the fuel oil and has a limit of 10 mg/l. The current frequency for conducting this test is every 92 days, which takes into consideration fuel oil degradation trends that indicate that particulate concentration is unlikely to change significantly between surveillances. The testing frequency of 92 days will remain the same.

The proposed change to TS 5.5.12.c will provide the flexibility of using 10 CFR 50.59 to implement required testing of both new fuel oil and stored fuel oil, including sampling and testing requirements, in accordance with applicable ASTM standards, whenever there are changes in EPA regulations for fuel oil or newer editions of the ASTM standards. Currently the use of a different ASTM Standard than specified in TS 5.5.12.c or a newer edition of the ASTM Standard is not permitted without an Amendment to the TS. NUREG-1431 Rev 1 previously relocated all references to ASTM Standards to licensee controlled documents, with the exception of TS 5.5.12.c.

Precedent

The proposed change is consistent with those presented and approved by the NRC with the approval of TSTF-374-A, Rev 0 in letter dated January 13, 2005.

Proposed Change

The proposed change revises TS 5.5.12 as follows:

TS 5.5.12.c currently states,

“Total particulate concentration of the stored fuel oil is ≤ 10 mg/l when tested every 92 days in accordance with ASTM D-2276, Method A-2 or A-3; and”

TS 5.5.12.c will be revised to state:

“Total particulate concentration of the stored fuel oil is ≤ 10 mg/l when tested every 92 days; and”

Environmental Review

10 CFR 51.22(c)(9) provides criteria for the identification of licensing and regulatory action eligible for categorical exclusion for performing an environmental assessment. A proposed amendment to an operating license for a facility does not require an environmental assessment if operation of the facility in accordance with the proposed Amendment would not (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and (3) result in a significant increase in individual or cumulative occupational radiation exposure.

The proposed change to relocate references to ASTM Standards to a licensee controlled document has been reviewed and determined that it meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(c)(9), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the proposed license amendment. The basis for this determination is as follows:

1. The amendment involves no significant hazards consideration.

As described in the significant hazards consideration evaluation, the proposed change does not involve a significant hazards consideration.

2. There is no significant change in the type or significant increase in the amounts of any effluents that may be released offsite.

The proposed change does not involve the installation of any new equipment, or the modification of any equipment that may affect the types or amounts of effluents that may be released offsite. Therefore, there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

3. There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed change does not involve plant physical changes, or introduce any new mode of operation. Therefore, there is no significant increase in individual or cumulative occupational radiation exposure.

Significant Hazards Consideration Determination

Dominion has reviewed the criteria as set forth in 10 CFR 50.92 as they relate to the proposed change and determined that the change does not represent a significant hazards consideration. This is consistent with the conclusion determined by Technical Specification Task Force Improved Standard Technical Specifications Change Traveler (TSTF)-374-A, Rev 0. The proposed change revises the TS 5.5.12, "Diesel Fuel Oil Testing Program," to remove the specific reference to ASTM Standards. The following is provided to support this conclusion:

1. Do changes involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change relocates the specific ASTM reference from the Administrative Controls Section of Technical Specifications (TS) to a licensee-controlled document. Relocating the specific ASTM Standard reference from the TS to a licensee controlled document will not affect nor degrade the ability of the EDGs to perform their specified safety function. Fuel oil quality will continue to meet the current ASTM requirements for particulate concentration.

The proposed change is administrative in nature and does not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, and configuration of the facility or the manner in which the plant is operated and maintained. The proposed change does not alter or prevent the ability of structures, systems or components from performing their intended function to mitigate the consequences on an initiating event with the assumed acceptance limits. The proposed change does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated. Further, the proposed change does not increase the types and amounts of radioactive effluent that may be released offsite, nor significantly increase individual or cumulative occupational/public radiation exposure.

Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do changes create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change relocates the specific ASTM reference from the Administrative Controls Section of Technical Specifications to a licensee-controlled document.

The change does not involve a physical alteration of the plant or a change in the methods governing normal plant conditions. In addition, the change does not impose any new or different requirements or eliminate any existing requirements. The change does not alter assumptions made in the safety analysis and licensing

basis. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Do changes involve a significant reduction in the margin of safety?

The proposed change relocates the specific ASTM reference from the Administrative Controls Section of TS to a licensee-controlled document. The detail associated with the specific ASTM standard reference is not required to be in the TS to provide adequate protection of the public health and safety, since the TS still retain the requirement for compliance with the applicable ASTM standard.

The level of safety of facility operation is unaffected by the proposed change since there is no change in the intent of the TS requirements of assuring fuel oil is of the appropriate quality for EDG use. The proposed change provides the flexibility needed to maintain state-of-the-art technology in fuel oil sampling and analysis methodology.

The proposed change does not reduce a margin of safety since it has no impact on any transient or safety.

Conclusion

The proposed Technical Specification change will continue to assure that the quality of the diesel fuel will be maintained at standards that provide high reliability of diesel availability.

References

The following references support the proposed Technical Specification change and the evaluation of this change.

1. NUREG 1431, Rev 1, Improved "Standard Technical Specifications Westinghouse Plants," Improved Technical Specifications 3.8.3, "Diesel Fuel Oil and Starting Air" with supporting Bases, and 5.5.12, "Diesel Fuel Oil Testing Program."
2. Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-374-A, Rev 0, "Revision to TS 5.5.13 and Associated TS Bases for Diesel Fuel Oil."
3. NRC Letter dated January 13, 2005 from NRC to the Members of the Technical Specification Task Force (NRC's Approval and Safety Evaluation Report for TSTF-374).
4. UFSAR Chapter 9.5.4, "EDG Fuel Oil Storage and Transfer System."

Attachment 2

Mark-up of Unit 1 and Unit 2 Technical Specifications Change

**North Anna Power Station
Units 1 and 2
Virginia Electric and Power Company
(Dominion)**

5.5 Programs and Manuals

5.5.12 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 1. an API gravity or an absolute specific gravity within limits,
 2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
 3. water and sediment $\leq 0.05\%$.
- b. Within 31 days following addition of the new fuel oil to storage tanks verify that the properties of the new fuel oil, other than those addressed in a. above, are within limits for ASTM 2D fuel oil;
- c. Total particulate concentration of the stored fuel oil is ≤ 10 mg/l when tested every 92 days ~~in accordance with ASTM D 2276, Method A-2 or A-3;~~ and
- d. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program testing Frequencies.

5.5.13 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
 1. a change in the TS incorporated in the license; or

(continued)

Attachment 3

Proposed Unit 1 and Unit 2 Technical Specifications Change

**North Anna Power Station
Units 1 and 2
Virginia Electric and Power Company
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5.5 Programs and Manuals

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- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 1. an API gravity or an absolute specific gravity within limits,
 2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
 3. water and sediment $\leq 0.05\%$.
- b. Within 31 days following addition of the new fuel oil to storage tanks verify that the properties of the new fuel oil, other than those addressed in a. above, are within limits for ASTM 2D fuel oil;
- c. Total particulate concentration of the stored fuel oil is ≤ 10 mg/l when tested every 92 days; and
- d. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program testing Frequencies.

5.5.13 Technical Specifications (TS) Bases Control Program

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- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
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 1. a change in the TS incorporated in the license; or

(continued)