

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 25, 2006

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

Serial No. 06-674
NL&OS/GSS R0
Docket Nos. 50-338
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License Nos. NPF-4
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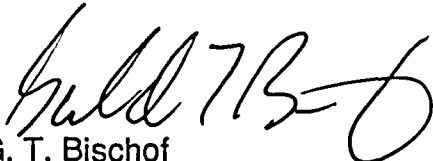
VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
NORTH ANNA POWER STATION UNITS 1 AND 2
ANNUAL SUBMITTAL OF TECHNICAL SPECIFICATION BASES CHANGES
PURSUANT TO TECHNICAL SPECIFICATION 5.5.13.d

Pursuant to Technical Specifications 5.5.13.d, "Technical Specification (TS) Bases Control Program," Dominion hereby submits the changes to the Bases of the Technical Specifications implemented since October 2005.

Each Bases change to the Technical Specifications was reviewed and approved by the Station Nuclear Safety and Operating Committee. It was determined that these changes did not require a change to the Technical Specifications or license, or involve a change to the UFSAR or Bases that required NRC prior approval pursuant to 10 CFR 50.59. A summary of each Bases change implemented since October 2005 is provided in Attachment 1. Attachment 2 is a compact disc of the entire TS Bases through Revision 26 for your information.

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

Sincerely,



G. T. Bischof
Vice President – Nuclear Engineering

Attachments

1. Summary of Bases Changes
2. Current Bases through Revision 26 to Technical Specification Bases (CD)

Commitments made in this letter: None

A001

cc: U. S. Nuclear Regulatory Commission
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ATTACHMENT 1

Serial No. 06-674

**SUMMARY OF BASES CHANGES
FROM OCTOBER 2005 TO OCTOBER 2006**

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

Summary of Bases Changes

Revise Definition of Bank Fully Inserted for TS Bases 3.1.9 (Bases – TS 3.1.9 Background)

This Bases change revised the Bases for TS 3.1.9 to permit the performance of the rod swap measurements with the test banks inserted to 2 steps withdrawn rather than 0 steps withdrawn (fully inserted). The change is based upon an engineering evaluation for performing rod swap measurements. The term “fully inserted” redefined to be from 0 to 2 steps withdrawn for measurements using the rod swap technique.

Clarification of RCS Vent Requirements (Bases – TS 3.4.12 Background – RCS Vent Requirements)

This Bases change clarified the Bases for TS 3.4.12, "RCS Vent Requirements" to state that a PORV Block Valve is maintained in the open position and verified open through administrative controls in lieu of being blocked open in order to establish an RCS vent path to prevent overpressurization. The PORV Block Valve is a motor operated valve maintained in the open position and, as such, is not required to be subject to an active failure that would close the valve (e.g., spurious operation).

Clarification of Single Failure Protection for TS 3.7.3 (Bases – TS 3.7.3 LCO, Background, and Action E.1)

This Bases change revised the Bases for TS 3.7.3 LCO, Background and Action E.1 to clarify the system configuration for single failure protection of the Main Feedwater System Motor Operator Valves. The change clarified what constitutes a flow path to ensure single failure protection.

Clarification of Underground Fuel Oil Storage Tank Requirements (Bases – TS 3.8.3, Actions A.1, A.2, A.3, and A.4)

This Bases change deleted reference to the ASME Code, Section XI requirements when performing an inspection of the underground fuel oil storage tanks as referenced in the Bases for TS 3.8.3, “Diesel Fuel Oil and Starting Air.” The Bases for TS 3.8.3 states that “Every ten years a fuel oil storage tank must be inspected for integrity under the requirements of ASME Code, Section XI.” Based upon the results of an engineering evaluation, it was determined that Section XI requirements are not applicable to the inspection of the underground fuel oil storage tanks.

Revised Frequency for TADOT of P-4 Interlock Surveillance Frequency (Bases – TS 3.3.2 Applicable Safety Analysis, LCO and Applicability for Item 8.a, “Engineered Safety Feature Actuation System Interlocks-Reactor Trip, P-4, SR 3.3.2.7 and SR 3.3.2.10)

These changes revised the surveillance requirement frequency and the associated Bases of the TADOT of the Reactor Trip P-4 ESFAS Interlock from “Once per reactor trip breaker cycle” to “18 months,” and expanded upon the design bases of the ESFAS P-4 interlock. The changes are consistent with WOG Standard Technical Specification Change Traveler TSTF-444-T, Rev 1 associated with the P-4 interlock.

The Bases changes noted above were submitted to the NRC on March 1, 2005 and incorporated into the Bases upon NRC approval of the associated Technical Specification changes (Amendments 244 for Unit 1 and 225 for Unit 2 issued on October 24, 2005).