



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 19, 2011

Mr. David A. Heacock  
President and Chief Nuclear Officer  
Virginia Electric and Power Company  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 23060-6711

SUBJECT: NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2, CORRECTION LETTER REGARDING AMENDMENT NOS. 262 AND 243 TO ADOPT TECHNICAL SPECIFICATION TASK FORCE (TSTF)-425, REVISION 3, FOR THE RELOCATION OF SPECIFIC SURVEILLANCE FREQUENCY REQUIREMENTS TO A LICENSEE CONTROLLED PROGRAM

Dear Mr. Heacock:

On January 31, 2011, the U.S. Nuclear Regulatory Commission (NRC, the Commission) issued Amendment Nos. 262 and 243 to Renewed Facility Operating License Nos. NPF-4 and NPF-7 for the North Anna Power Station, Unit Nos. 1 and 2. The amendments revised the Technical Specifications (TSs) by relocating specific surveillance frequencies (SFs) to a surveillance frequency control program (SFCP), consistent with NRC-approved Industry Technical Specification Task Force (TSTF) Standard Technical Specifications change TSTF-425, Revision 3.

In a discussion with our staff on July 21, 2011, a representative of your staff identified a mistake in your license amendment request (LAR) submitted by letters dated March 30, and August 30, 2010, and January 18, 2011. The mistake was that when changing the SFs on page 3.4.12-3 of the TSs in accordance with TSTF-425, the Completion Time (CT) for TS 3.4.12, Condition G, at the top of the page, was also modified such that it would be governed by the SFCP. The NRC staff clearly considers this to be an error to be corrected. The NRC staff considers that the use of a letter for this type of change is allowed by the NRC's "Proposed Guidance for Correction of Technical Specification Typographical Errors," SECY-96-238, dated November 19, 1996 (the guidance in SECY-96-238 was approved in a Staff Requirements Memorandum dated December 17, 1996).

The surveillance requirements (SRs) and the limiting conditions for operation (LCO), with the attendant Conditions for the LCOs, are recognized as separate and discrete parts of the TSs in Title 10 of the *Code of Federal Regulations*, Part 50, Section 50.36, "Technical specifications." The NRC staff confirms that nothing within the scope of TSTF-425 is intended to address any changes in TS Completion Times.

The guidance in SECY 96-238 allows for use of an administrative letter to correct an error provided that 1) the error was introduced inadvertently in a particular license amendment; and 2) the erroneous change was not addressed in the notice to the public nor reviewed by the NRC staff. Dominion staff has identified orally and the NRC staff also independently determines that the error occurred in the LAR and in License Amendment Nos. 262 and 243. This satisfied the first

D. Heacock

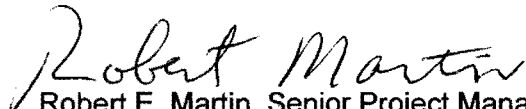
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requirement. Changes to TS Completion Times were not included within the scope of TSTF-425 documentation, were not identified in the notice on the amendment published in the *Federal Register* (75 FR 27833) and was not the subject of any specific part of the staff's safety evaluation that was issued with the license amendment. This satisfied the second requirement.

The CT to take the required action for TS 3.4.12, Condition G, with two required power operated relief valves inoperable was previously identified in the TS as being 12 hours. In consideration of the erroneous markup of this CT, the CT of 12 hours continued in effect with the issuance of Amendment Nos. 262 and 243 and is currently applicable.

The NRC staff has reviewed the licensee's request to correct the error on TS page 3.4.12-3 in accordance with the guidance in SECY 96-238. Based on our review, as set forth above, we have determined that the use of a letter to correct the typographical error is acceptable. Enclosed is the corrected TS page 3.4.12-3.

Sincerely,

  
Robert E. Martin, Senior Project Manager  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-338 and 50-339

Enclosure:  
Corrected TS 3.4.12

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ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>G. Two required PORVs inoperable.</p> <p><u>OR</u></p> <p>Required Action and associated Completion Time of Condition A, B, D, E, or F not met.</p> <p><u>OR</u></p> <p>LTOP System inoperable for any reason other than Condition A, B, C, D, E, or F.</p>	<p>G.1 Depressurize RCS and establish RCS vent of <math>\geq 2.07</math> square inches.</p>	<p>12 hours</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.12.1 Verify a maximum of one LHSI pump is capable of injecting into the RCS.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.4.12.2 Verify a maximum of one charging pump is capable of injecting into the RCS.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.4.12.3 -----NOTE----- Only required to be met if accumulator pressure is greater than PORV lift setting. ----- Verify each accumulator is isolated and power is removed from the accumulator isolation valve operator.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

requirement. Changes to TS Completion Times were not included within the scope of TSTF-425 documentation, were not identified in the notice on the amendment published in the *Federal Register* (75 FR 27833) and was not the subject of any specific part of the staff's safety evaluation that was issued with the license amendment. This satisfied the second requirement.

The CT to take the required action for TS 3.4.12, Condition G, with two required power operated relief valves inoperable was previously identified in the TS as being 12 hours. In consideration of the erroneous markup of this CT, the CT of 12 hours continued in effect with the issuance of Amendment Nos. 262 and 243 and is currently applicable.

The NRC staff has reviewed the licensee's request to correct the error on TS page 3.4.12-3 in accordance with the guidance in SECY 96-238. Based on our review, as set forth above, we have determined that the use of a letter to correct the typographical error is acceptable. Enclosed is the corrected TS page 3.4.12-3.

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*/RA/*

Robert E. Martin, Senior Project Manager  
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