VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

10 CFR 50.90

May 11, 2012

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

Serial No. 12-331
NAPS/JHL
Docket No. 50-339
License No. NPF-7

**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**
**NORTH ANNA POWER STATION UNIT 2**
**PROPOSED LICENSE AMENDMENT REQUEST - TEMPORARY CHANGE TO ALLOW TWO INOPERABLE DEMAND POSITION INDICATORS PER CONTROL BANK**

Pursuant to 10 CFR 50.90, Dominion requests an amendment, in the form of a change to the Technical Specifications (TS) to Facility Operating License Number NPF-7 for North Anna Power Station Unit 2. Technical Specifications (TS) Limiting Condition for Operation (LCO) Section 3.1.7, "Rod Position Indication," provides the operability requirements, Allowed Conditions, Required Actions, Completion Times and Surveillance Requirements associated with the Rod Position Indication System. TS LCO Section 3.1.7, Condition D, provides the Required Actions and Completion Times for one demand position indicator inoperable per bank for one or more banks. However, there is no Condition provided for two demand position indicators inoperable per bank for one or more banks. This proposed temporary change will allow two demand position indicators in one or more banks to be inoperable for 4 hours to allow maintenance on the Rod Control System during the remainder of North Anna Unit 2 Cycle 22 should the two demand position indicators in the same bank become inoperable. A similar change was approved by the NRC staff for the H. B. Robinson Steam Electric Plant, Unit No. 2 on January 29, 2008 with the issuance of Amendment No. 217.

A discussion of the proposed change is provided in Attachment 1. We have evaluated the proposed Technical Specifications change and have determined that it does not involve a significant hazards consideration as defined in 10 CFR 50.92. The basis for that determination is provided in Attachment 1. We have also determined that operation with the proposed change will not result in any significant increase in the amount of effluents that may be released offsite and no significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed changes. The basis for that determination is also provided in Attachment 1. The marked-up and typed pages are included in Attachments 2 and 3, respectively.

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NRR

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

Very truly yours,

J. Alan Price
Vice President – Nuclear Engineering

Commitments made in this letter: None

Attachments:
1. Discussion of Change
2. Marked-up Technical Specifications Pages
3. Proposed Technical Specification Pages

COMMONWEALTH OF VIRGINIA )
)
COUNTY OF HENRICO )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by J. Alan Price, who is Vice President – Nuclear Engineering 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 11th day of May, 2012.

My Commission Expires: April 30, 2015

Notary Public

cc: U.S. Nuclear Regulatory Commission
Marquis One Tower
245 Peachtree Center Avenue, NE
Suite 1200
Atlanta, Georgia 30303-1257

Mr. J. E. Reasor, Jr.
Old Dominion Electric Cooperative
Innsbrook Corporate Center
4201 Dominion Blvd.
Suite 300
Glen Allen, Virginia 23060

State Health Commissioner
Virginia Department of Health
James Madison Building - 7th floor
109 Governor Street
Suite 730
Richmond, Virginia 23219

NRC Senior Resident Inspector
North Anna Power Station

Dr. V. Sreenivas
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop O8 G-9A
11555 Rockville Pike
Rockville, Maryland 20852-2738

Ms. K. R. Cotton
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop O8 G-9A
11555 Rockville Pike
Rockville, Maryland 20852-2738

# Attachment 1

# Discussion of Change

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

## EVALUATION OF PROPOSED CHANGES

## ROD POSITION INDICATION

### 1.0 DESCRIPTION

Technical Specifications (TS) Limiting Condition for Operation (LCO) Section 3.1.7, "Rod Position Indication," provides the operability requirements, allowed Conditions, Required Actions, Completion Times and Surveillance Requirements associated with the Rod Position Indication System. TS LCO Section 3.1.7, Condition D, provides the Required Actions and Completion Times for one demand position indicator inoperable per bank for one or more banks. There is no Condition provided for two demand position indicators inoperable per bank for one or more banks. This proposed temporary change will allow two demand position indicators in one or more banks to be inoperable for 4 hours to allow maintenance on the Rod Control System. A similar change was approved by the NRC staff for the H. B. Robinson Steam Electric Plant, Unit No. 2 on January 29, 2008 with the issuance of Amendment No. 217.

### 2.0 PROPOSED CHANGES

The proposed change will allow two demand position indicators in one or more banks to be inoperable for 4 hours. This change is proposed as a temporary change to the TS for the current operating cycle and is provided as a footnote to the current TS LCO Section 3.1.7, Condition D. The proposed footnote states, "During North Anna Unit 2 Cycle 22, the Condition of two demand position indicators per bank inoperable for one or more banks is allowed with a Required Action to restore one demand position indicator per bank and a Completion Time of 4 hours provided the Rod Control System is immediately placed in a condition incapable of rod movement and verify by administrative means that the RPIs for the affected banks are OPERABLE and the rods are aligned within 12 steps. If the 4 hour Completion Time is not met, enter Condition E."

### 3.0 BACKGROUND

Technical Specifications (TS) Limiting Condition for Operation (LCO) Section 3.1.7, "Rod Position Indication," provides the operability requirements, allowed Conditions, Required Actions, Completion Times and Surveillance Requirements associated with the Rod Position Indication system. TS LCO Section 3.1.7, Condition D, provides the Required Actions and Completion Times for one demand position indicator per bank inoperable for one or more banks. There is no Condition provided for two demand position indicators per bank inoperable for one or more banks. Therefore, based on the current TS, entry into LCO 3.0.3 is required for this condition. The current requirements are considered overly restrictive because the inoperability of two demand position indicators in a bank only affects the ability to determine the control system demand position for the bank. The actual rod position indications remain available through the use of the rod position indicators (RPIs), as required by Required Action D.1.1. The action requires that all RPIs for the affected banks be verified operable by administrative means once per 8 hours with one inoperable demand position indicator in the bank.

This temporary TS change is being proposed at this time due to potential maintenance activities associated with the rod control system (a single group demand counter) which would render both groups of demand position indicators inoperable in one or more banks to complete the maintenance. In February 2012, rod operability testing identified the inoperability of three demand position indicators (Shutdown Bank A Group 2, Control Bank A Group 2, and Control Bank C Group 2) due to circuit card(s) in the logic cabinet. Adjustments were made to the seating of certain rod control cards, one card (A503) was replaced, and post maintenance testing was subsequently performed to verify operability of the demand counters. However, if other rod control cards required adjustment or replacement to eliminate the inoperability, there was the likelihood that both demand position indicators for the three control rod banks (Shutdown Bank A and Control Banks A and C) could have been made inoperable to correct the malfunction. This would have placed North Anna Unit 2 in TS 3.0.3.

In anticipation of similar results during future rod control system testing, and the ensuing maintenance activities that could potentially render both groups of demand position indicators inoperable for one or more banks, a temporary TS change is proposed that would establish a Condition for inoperability of two demand position indicators for one or more banks. This proposed change is requested on an expedited basis to establish a TS Condition that permits repair of the demand position indicators and eliminates the possibility of entry into TS 3.0.3 for repair activities or unit shutdown. Additional troubleshooting and necessary repairs on the demand step counters will be completed during the next Unit 2 refueling outage.

## 4.0 TECHNICAL ANALYSIS

A description of the Rod Position Indication system is provided in the Bases for LCO 3.1.7. A summary of the Rod Position Indication system, as described in the Bases for LCO 3.1.7, is provided as follows:

> "The axial position of shutdown rods and control rods are determined by two separate and independent systems: the Bank Demand Position Indication System (commonly called group step counters) and the Rod Position Indication (RPI) System.
>
> The Bank Demand Position Indication System counts the pulses from the Rod Control System that move the rods. There is one step counter for each group of rods. Individual rods in a group all receive the same signal to move and should, therefore, all be at the same position indicated by the group step counter for that group. The Bank Demand Position Indication System is considered highly precise (± 1 step or ± 5/8 inch). If a rod does not move one step for each demand pulse, the step counter will still count the pulse and incorrectly reflect the position of the rod.
>
> The RPI System provides a highly accurate indication of actual control rod position, but at a lower precision than the step counters. This system is based on inductive analog

signals from a series of coils spaced along a hollow tube. The RPI System is capable of monitoring rod position within at least ± 12 steps."

As previously stated, the current TS do not include a Condition for the inoperability of two demand position indicators in one or more banks. Based on the current TS, entry into LCO 3.0.3 is required for this condition. The current requirements are considered overly restrictive because the inoperability of two demand position indicators in a bank only affects the ability to determine the control system demand position for the bank. The actual rod position indications remain available through the use of the RPIs, as required by Required Action D.1.1, which requires that all RPIs for the affected banks be verified operable by administrative means once per 8 hours. In addition, Required Action D.1.2 requires verification that the most withdrawn rod and the least withdrawn rod of the affected banks are $\leq$ 12 steps apart once every 8 hours.

A Completion Time limit of 4 hours for the proposed Condition provides a time limit that is more restrictive than the Completion Times associated with Condition D of LCO 3.1.7. Therefore, the Completion Time limit for the proposed temporary Condition and associated Required Action to restore one demand position indicator per bank will allow completion of the Condition D Required Actions after restoration of one demand position indicator per bank. During the timeframe where two demand position indicators per bank are inoperable, the Rod Control System will be placed in a condition incapable of rod movement to allow Operators to maintain control of rod position. In addition, the RPIs for the affected banks will immediately be verified Operable with the rods in the affected bank are aligned within 12 steps. Typical adjustments to maintain RPI indications accurate are permitted at power. If the Required Action to restore one indicator per affected bank is not completed within 4 hours, then Condition E would be entered because there is no applicable LCO and Required Action E. 1 would then direct the plant to be in MODE 3 within 6 hours would be applicable.

The inoperability of two demand position indicators in one or more banks does not directly affect any accident analysis or design basis limits or cause any limits not to be met. The inoperability of these indicators does prevent the comparison of the RPIs to the demand position indication for verification of rod insertion and rod group alignment limits, which are required limits for maintaining the reactor within analyzed conditions. The use of a 4 hour Completion Time limit provides a restriction that limits the time that reactor operation can continue during the loss of one method of indirectly determining position indication. This time limit is more restrictive than TS requirements that are generally specified for this type of loss of indication. For example, the loss of the rod insertion limit monitor requires verification that each control bank is within the limits specified in the core operating limits report (COLR) for TS Surveillance Requirement (SR) 3.1.6.2. SR 3.1.6.2 is conducted in accordance with the Surveillance Frequency Control Program (SFCP). The SFCP specifies a frequency of 12 hours.

The current TS requirements that use demand position indicators include the following:

- LCO 3.1.4 states "All shutdown and control rods shall be OPERABLE AND Individual indicated rod positions shall be within 12 steps of their group step counter demand

position." Additionally, SR 3.1.4.1 requires verification of individual rod positions within alignment limits at a frequency as specified in accordance with the SFCP. The SFCP specifies a frequency of 12 hours.

- LCO 3.1.5 states "Each shutdown bank shall be within insertion limits specified in the COLR." SR 3.1.5.1 requires verification that each shutdown bank is within the limits specified in the COLR at a frequency as specified in accordance with the SFCP. The SFCP specifies a frequency of 12 hours. This can be accomplished with the individual rod position indicators (IRPIs).

- LCO 3.1.6 states "Control banks shall be within the insertion, sequence, and overlap limits specified in the COLR." SR 3.1.6.2 requires verification that each control bank is within the insertion limits specified in the COLR at a frequency as specified in accordance with the SFCP. SR 3.1.6.3 requires verification that each control bank not fully withdrawn from the core is within the sequence and overlap limits specified in the COLR at a frequency specified in the SFCP. The SFCP specifies verification frequencies of 12 hours. This can be accomplished with the individual rod position indicators (IRPIs).

- LCO 3.1.7 states "The Rod Position Indication (RPI) System and the Demand Position Indication System shall be OPERABLE." Required Action D.1.1, requires that all RPIs for the affected banks be verified operable by administrative means once per 8 hours and Required Action D.1.2 requires verification that the most withdrawn rod and the least withdrawn rod of the affected banks are $\leq$ 12 steps apart once every 8 hours.

During the time that two demand position indicators are inoperable in a bank, rod position can be verified with the RPIs (both Main Control Room indication and Plant Computer System (PCS)). A temporary Completion Time limit for restoring at least one demand position indicator in the affected bank has been chosen to be 4 hours. This time limit is consistent with the most limiting Completion Time and surveillances associated with the use of the demand position indicators and will provide adequate time to perform maintenance on the inoperable demand counter. Additionally, the requirements for the use of RPIs and applicable conditions for inoperable RPIs are unaffected by the proposed change. For example, LCO 3.1.7 Required Action C.1 requires that the position of the rods with inoperable position indicators be verified by using the movable incore detectors within 4 hours of moving the affected rods in excess of 24 steps in one direction. In addition, the Rod Control System will be placed in a condition incapable of rod movement and the RPI for the affected banks will be immediately verified Operable with the rods in the affected bank aligned within 12 steps. If the 4 hour Completion Time is not met, then Condition E will be entered.

The loss of both demand position indicators in one or more banks does not prevent or inhibit operation of the control rods. The reactor protection functions remain operable and able to mitigate design basis events and transient conditions. Additionally, the applicable core power distribution limits (i.e., LCO 3.2.1 Heat Flux Hot Channel Factor, LCO 3.2.2 Nuclear Enthalpy Rise Hot Channel Factor, LCO 3.2.3 Axial Flux Difference, and LCO 3.2.4 Quadrant Power Tilt Ratio) remain in effect in accordance with the applicability

requirements for these TS. This further ensures the reactor will be maintained within required limits.

The preceding justifications provide the basis for the proposed change. This TS change is being proposed at this time due to potential maintenance requirements associated with the rod control system which would render both groups of demand position indicators inoperable in one or more banks for a brief period of time. In February 2012, rod operability testing identified the inoperability of three demand position indicators in three control rod banks due to circuit card(s) in the logic cabinet. Adjustments were made to the seating of certain rod control cards, one card (A503) was replaced, and post maintenance testing was subsequently performed to verify operability of the demand counters. However, if other rod control cards had required adjustment to eliminate the inoperability, there would have been the likelihood that both demand position indicators for the three control rod banks may have been rendered inoperable to correct the malfunction, and that would have placed North Anna Unit 2 in TS 3.0.3.

In anticipation of similar results during future rod control system testing and ensuing maintenance activities that could potentially render both groups of demand position indicators inoperable for one or more banks, a temporary TS change is proposed that would establish a Condition for inoperability of two demand position indicators for one or more banks. This proposed change is requested on an expedited basis to establish a TS Condition that permits for repair of the demand position indicators and eliminate the possible entry into TS 3.0.3 for repair activities or unit shutdown.

## 5.0 NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Dominion has evaluated the proposed changes to the TS using the criteria in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration. An analysis of the issue of no significant hazards consideration is presented below:

Description of Amendment Request:

The proposed amendment would revise TS 3.1.7, "Rod Position Indication" to allow two demand position indicators in one or more banks to be inoperable for up to 4 hours. This change is proposed as a temporary change to the TS for the current operating cycle and is proposed as a footnote to the current TS LCO Section 3.1.7, Condition D. The proposed footnote states, "During North Anna Unit 2 Cycle 22, the Condition of two demand position indicators per bank inoperable for one or more banks is allowed with a Required Action to restore one demand position indicator per bank and a Completion Time of 4 hours provided the Rod Control System is immediately placed in a condition incapable of rod movement and verify by administrative means that the RPIs for the affected banks are OPERABLE and the rods are aligned within 12 steps. If the 4 hour Completion Time is not met, enter Condition E."

Basis for proposed no significant hazards consideration determination:

As required by 10 CFR 50.91(a), the Dominion analysis of the issue of no significant hazards consideration using the standards in 10 CFR 50.92 is presented below:

1. Does the Proposed Change Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated?

   Response: No

   The proposed change provides a new Condition for two demand position indicators inoperable in one or more banks. The inoperability of two demand position indicators in one or more banks does not directly affect any accident analysis or design basis limits or cause any limit not to be met, because the demand position indicator only provides the intended demand as determined by the rod control system. The actual position of the control rods is determined by use of the RPIs for each control rod, or the movable incore detector system when the RPIs are inoperable.

   The inoperability of the demand position indicators does prevent the comparison of the RPIs to the demand position indication for verification of rod insertion and rod group alignment limits, which is conducted as a periodic surveillance to maintain the reactor within analyzed conditions. The use of a 4 hour Completion Time limit provides a restriction that limits the time that reactor operation can continue during this loss of the demand position indication. Since the loss of the demand position indication does not cause the rods to change position, hence the actual control rod positions are expected to remain within required limits. Placing the Rod Control System in a condition incapable of rod movement is a positive control to prevent rod stepping while maintenance is being performed.

   The proposed change to allow two demand position indicators to be inoperable in one or more banks does not affect the automatic or manual shutdown capability of the reactor protection system and no accident analyses are impacted by the proposed change. The operability of the control rods is not affected by the inoperability of the demand position indicators.

   Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated, because this change does not result in the increased likelihood of any accident initiator or precursor, and the existing accident analyses are unaffected by the proposed change.

2. Does the Proposed Change Create the Possibility of a New or Different Kind of Accident from any Accident Previously Evaluated?

   Response: No

The proposed change provides new requirements for two demand position indicators inoperable in one or more banks. No new accident initiators are introduced by the proposed requirements because the allowed condition for inoperability of the demand position indicators does not cause any new failure modes to be created that can cause an accident. The proposed change does not affect the reactor protection system or the reactor control system. The control rods should remain within the required limits because the failure of the demand position indicators does not cause the rods to change position and the RPIs remain available in the affected banks to verify the position of the control rods. In addition, the Rod Control System is placed in a condition incapable of rod movement as a positive control to prevent rod stepping while maintenance is being performed. Hence, no new failure modes or accident sequences are created that would cause a new or different kind of accident from any accident previously evaluated.

Therefore, operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the Proposed Change Involve a Significant Reduction in a Margin of Safety?

Response: No

The operability of the RPIs is required to determine control rod positions and thereby ensure compliance with the control rod alignment and insertion limits. The proposed change does not alter the requirement to determine rod position, but provides a new Condition for two demand position indicators inoperable in one or more banks. The inoperability of two demand position indicators for one or more banks results in the reduced ability to periodically verify that RPIs are operable and within expected limits. The condition does prevent the comparison of the RPIs to the demand position indication for verification of rod insertion and rod group alignment limits, which is conducted as periodic surveillance to maintain the reactor within analyzed conditions. The loss of the demand position indication does not cause the rods to change position, hence the actual control rod positions are expected to remain within required limits. The use of a 4 hour Completion Time limit provides a restriction that limits the time that reactor operation can continue during this loss of the demand position indication. This ensures the condition is promptly corrected or the reactor shutdown in accordance with the applicable Technical Specifications action statements. Thus, the proposed change maintains the operation of the reactor within the applicable margins of safety because the inoperability will be corrected or the unit will be shutdown prior to any significant reduction in the ability to verify control rod position by the use analog RPIs.

Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant reduction in the margin of safety.

Based upon the above analysis, Dominion concludes that the requested change does not involve a significant hazards consideration, as set forth in 10 CFR 50.92(c), "Issuance of Amendment."

## 6.0 ENVIRONMENTAL CONSIDERATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR Part 20, and would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

## 7.0 CONCLUSIONS

The proposed amendment affects TS Section 3.1.7, "Rod Position Indication." The proposed change revises the requirements related to rod position indication. The requirements for one inoperable bank demand position indicator are proposed to be modified to allow two demand position indicators inoperable per bank for one or more banks on a temporary basis for the current operating cycle. This TS change is being proposed at this time due to potential maintenance requirements associated with the rod control system which would render both groups of demand position indicators inoperable in one or more banks for a brief period of time during future rod control system testing. Therefore, this proposed TS change would establish a condition for inoperability of two demand position indicators for one or more banks. Dominion has concluded that the change is acceptable as discussed above. In addition, a similar change was approved by the NRC staff for the H. B. Robinson Steam Electric Plant, Unit No. 2 on January 29, 2008 with the issuance of Amendment No. 217. This proposed change is requested on an expedited basis to establish a TS Condition that permits for repair of the demand position indicators and eliminate the possible entry into TS 3.0.3 for repair activities or unit shutdown.

# Attachment 2

## Marked-up Technical Specifications Pages

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

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|---|---|---|
| D. One demand position indicator per bank inoperable for one or more banks.* | D.1.1 Verify by administrative means all RPIs for the affected banks are OPERABLE. | Once per 8 hours |
| | AND | |
| | D.1.2 Verify the most withdrawn rod and the least withdrawn rod of the affected banks are ≤ 12 steps apart. | Once per 8 hours |
| | OR | |
| | D.2 Reduce THERMAL POWER to ≤ 50% RTP. | 8 hours |
| E. Required Action and associated Completion Time not met. | E.1 Be in MODE 3. | 6 hours |

SURVEILLANCE REQUIREMENTS

| SURVEILLANCE | FREQUENCY |
|---|---|
| SR 3.1.7.1 Perform CHANNEL CALIBRATION of each RPI. | In accordance with the Surveillance Frequency Control Program |

*During North Anna Unit 2 Cycle 22, the Condition of two demand position indicators per bank inoperable for one or more banks is allowed with a Required Action to restore one demand position indicator per bank and a Completion Time of 4 hours provided the Rod Control System is immediately placed in a condition incapable of automatic rod movement and verify by administrative means that the RPIs for the affected banks are OPERABLE and the rods are aligned within 12 steps. If the 4 hour Completion Time is not met, enter Condition E.

# Attachment 3

# Proposed Technical Specification Pages

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

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|---|---|---|
| D. One demand position indicator per bank inoperable for one or more banks.* | D.1.1 Verify by administrative means all RPIs for the affected banks are OPERABLE.<br><br>AND<br><br>D.1.2 Verify the most withdrawn rod and the least withdrawn rod of the affected banks are ≤ 12 steps apart.<br><br>OR<br><br>D.2 Reduce THERMAL POWER to ≤ 50% RTP. | Once per 8 hours<br><br><br><br><br>Once per 8 hours<br><br><br><br><br>8 hours |
| E. Required Action and associated Completion Time not met. | E.1 Be in MODE 3. | 6 hours |

SURVEILLANCE REQUIREMENTS

| SURVEILLANCE | | FREQUENCY |
|---|---|---|
| SR 3.1.7.1 | Perform CHANNEL CALIBRATION of each RPI. | In accordance with the Surveillance Frequency Control Program |

*During North Anna Unit 2 Cycle 22, the Condition of two demand position indicators per bank inoperable for one or more banks is allowed with a Required Action to restore one demand position indicator per bank and a Completion Time of 4 hours provided the Rod Control System is immediately placed in a condition incapable of automatic rod movement and verify by administrative means that the RPIs for the affected banks are OPERABLE and the rods are aligned within 12 steps. If the 4 hour Completion Time is not met, enter Condition E.