

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

November 26, 1996

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

Serial No. 96-492  
NL&OS/GSS  
Docket Nos. 50-338, 339  
50-270, 271  
License Nos. NPF-4, 7  
DPR-32, 37

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**SURRY POWER STATION UNITS 1 AND 2**  
**PROPOSED TECHNICAL SPECIFICATIONS CHANGE**  
**REMOVAL OF RECORD RETENTION REQUIREMENTS**

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications, to Facility Operating License Numbers NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2 and DPR-32 and 37 for Surry Power Station Units 1 and 2. The proposed changes will eliminate the records retention requirements for the Administrative Section of the Technical Specifications in accordance with Generic Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

A discussion of the proposed Technical Specifications changes is provided in Attachment 1. The proposed Technical Specifications changes are provided for both stations in Attachment 2. It has been determined that the proposed Technical Specifications changes do not involve an unreviewed safety question as defined in 10 CFR 50.59 or a significant hazards consideration as defined in 10 CFR 50.92. The basis for our determination that the changes do not involve a significant hazards consideration is provided in Attachment 3. The proposed Technical Specifications changes have been reviewed and approved by the Station Nuclear Safety and Operating Committees and the Management Safety Review Committee.

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Should you have any questions or require additional information, please contact us.

Very truly yours,



James P. O'Hanlon  
Senior Vice President - Nuclear

Attachments

cc: U.S. Nuclear Regulatory Commission  
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Mr. R. D. McWhorter  
NRC Senior Resident Inspector  
North Anna Power Station

Mr. R. A. Musser  
NRC Senior Resident Inspector  
Surry Power Station

Commissioner  
Department of Radiological Health  
Room 104A  
1500 East Main Street  
Richmond, VA 23219

COMMONWEALTH OF VIRGINIA )  
 )  
COUNTY OF HENRICO )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by J. P. O'Hanlon, who is Senior Vice President - Nuclear, of Virginia Electric and Power Company. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 26<sup>TH</sup> day of November, 1996.

My Commission Expires: May 31, 1998.

Vicki L. Hull  
Notary Public

(SEAL)

**ATTACHMENT 1**

**DISCUSSION OF CHANGES**

**VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY AND NORTH ANNA POWER STATIONS UNITS 1 AND 2**

## Discussion of Changes

### Introduction

Currently, North Anna Units 1 and 2 Technical Specifications and Surry Units 1 and 2 Technical Specifications provide retention requirements for certain operations phase records in the Administrative Controls Section. These requirements specify which records are to be retained for five years and those which are to be retained for the duration of the Facility Operating License (lifetime retention). As discussed in NRC Administrative Letter 95-06, these technical specification requirements are substantially redundant to requirements established in licensees' quality assurance programs, in other NRC-approved programs (i.e., emergency preparedness plans, physical security plans, radiation protection plans, and fitness-for-duty programs), and in current regulations. Also, in NRC Administrative Letter 95-06, the NRC has determined that the provisions of 10 CFR 50.54(a) provide appropriate controls to ensure that sufficient records continue to be retained for commercial nuclear facilities. Thus, these records retention requirements can be removed from the Technical Specifications provided that they currently exist in another appropriately controlled document or if the specific requirements are relocated to one or more of these documents.

The proposed changes remove the retention requirements from the Administrative Controls Section of Technical Specifications. The record retention requirements presently in the Technical Specifications that are not identified in the Operational Quality Assurance Program (QA Topical Report) by reference to ANSI N45.2.9-1974, "Requirements for Collection, Storage, and Maintenance of QA Records for Nuclear Power Plants," are being relocated to the QA Topical Report. Chapter 17 of the UFSARs for both Surry and North Anna is the Operational Quality Assurance Program.

The proposed changes are administrative in nature and do not affect the design or operation of the plant in any way. Therefore, an unreviewed safety question or significant hazards consideration is not generated by the proposed Technical Specifications changes.

### Background

NRC efforts related to technical specification improvements include a revision to 10 CFR 50.36, revisions to Standard Technical Specifications, some generic communications, and many individual license amendments. Part of this effort is the relocation of certain Technical Specification requirements that are controlled directly by regulations and related licensee programs. On December 12, 1995, the NRC issued Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." Administrative Letter 95-06 discusses relocating certain Technical Specification administrative sections to licensee controlled documents/programs. The Records and Record Retention requirements were included in the Generic Letter for relocation from Technical Specifications.

In addition, to relocating the record retention requirements for Technical Specifications in accordance with the guidance of Administrative Letter 95-06, we intend to evaluate

the record retention requirements against the current regulations, ASME Code, and other applicable industry standards to provide consistency between stations and possibly reduce record retention requirements. Any change in record retention requirements will be submitted to the NRC in accordance with 10 CFR 50.54 (a).

### **Licensing Basis**

The current requirements for retention are included in the Operational Quality Assurance Program by commitment to Regulatory Guide 1.88, "Collection, Storage, and Maintenance of QA Records for Nuclear Power Plants," which endorses ANSI N45.2.9-1974. In addition, to the above record retention requirements, record retention requirements are also included in the Administrative Control Section of the Technical Specifications for Surry and North Anna.

### **Description Of Specific Changes**

The proposed amendment would delete the Technical Specifications requirements for record retention and relocate those requirements to the Operational Quality Assurance Program. Specifically, the North Anna and Surry Technical Specifications are revised as follows:

- Surry Unit 1 and Unit 2 Technical Specification 6.5 is replaced with the statement "Section 6.5, 'Station Operating Records,' has been relocated to the Operational Quality Assurance Program, and pages TS 6.5-2 and TS 6.5-3 have been deleted in their entirety."
- North Anna Unit 1 Technical Specification 6.10 is replaced with the statements "Section 6.10, 'Record Retention,' has been relocated to the Operational Quality Assurance Program" on page 6-22 and with "This Page Intentionally Left Blank" on page 6-23.
- North Anna Unit 2 Technical Specification 6.10 is replaced with the statement "Section 6.10, 'Record Retention,' has been relocated to the Operational Quality Assurance Program" on page 6-23.

### **Safety Significance**

Relocation of the Technical Specifications record retention requirements to the Operational Quality Assurance Program is administrative in nature and in no way affects the design or operations of the plant.

The probability that an accident will occur will neither be increased nor decreased by these proposed Technical Specification changes. The proposed changes have no direct impact on the function or method of operation of plant equipment. Thus, there is no increase or decrease in the probability of a previously analyzed accident due to these changes. Plant structures, systems, and components are not affected by the proposed changes. As such, the consequences of a malfunction of equipment important to safety previously evaluated in the UFSAR are not increased by these changes.

Record retention requirements do not contribute to the initiation of accidents or mitigate the consequences of postulated accidents. The relocation of record retention requirements from the Technical Specifications to the Operational Quality Assurance Program will not adversely impact these applications since these changes are administrative in nature and do not affect the design or operation of the plant. Therefore, the proposed changes to Technical Specifications neither produce a new accident scenario nor produce a previously unanalyzed type of equipment malfunction.

The proposed changes to Technical Specifications are administrative in nature. Only the retention periods for certain quality assurance records are affected, not the design nor the operation of facility structures, systems, or components.

Therefore, the proposed Technical Specification change package does not involve an unreviewed safety question as determined by the criteria of 10 CFR 50.59.