

ATTACHMENT 2A

PROPOSED TECHNICAL SPECIFICATIONS CHANGES

NORTH ANNA POWER STATION UNITS 1 AND 2

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6.10 RECORD RETENTION

Section 6.10, "Record Retention," has been relocated to the Operational Quality Assurance Program.

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ADMINISTRATIVE CONTROLS

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6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.1601 of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit.* Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Health Physicist.

* Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry in high radiation areas.

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ATTACHMENT 2B

PROPOSED TECHNICAL SPECIFICATIONS CHANGES

SURRY POWER STATION UNITS 1 AND 2

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.

ATTACHMENT 3

SIGNIFICANT HAZARDS CONSIDERATION

SURRY AND NORTH ANNA POWER STATIONS UNITS 1 AND 2

SIGNIFICANT HAZARDS CONSIDERATION

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). However, 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. Therefore, these 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. 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.

The proposed changes remove the record retention requirements from the Administrative Controls Section of Technical Specifications. The record retention requirements in the Technical Specifications that were 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," have been 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 anyway. Therefore, an unreviewed safety question has not been created by the proposed Technical Specifications changes.

Virginia Electric and Power Company has reviewed the TS changes against the criteria of 10 CFR 50.92 and has concluded that the changes as proposed do not pose a significant hazards consideration. Specifically, operation of the Surry and North Anna Power Stations in accordance with the proposed Technical Specifications changes will not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed administrative changes do not affect equipment or its operation. Therefore, the likelihood that an accident will occur is neither increased nor decreased by relocating record retention requirements from the Technical Specifications to the Operational Quality Assurance Program. This TS change will not impact the function or method of operation of plant equipment. Thus, a significant increase in the probability of a previously analyzed accident does not result due to this change. No systems, equipment, or components are affected by the proposed changes. Thus, the consequences of any accident previously evaluated in the UFSAR are not increased by this change.
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change does not alter the design or

operations of the physical plant. Since record retention requirements are administrative in nature, a change to these requirements does not contribute to accident initiation, an administrative change related to this activity does not produce a new accident scenario or produce a new type of equipment malfunction. This changes do not alter any existing accident scenarios. The proposed administrative change does not affect equipment or its operation, and, thus, does not create the possibility of a new or different kind of accident. Therefore, the proposed change does not create the possibility of a new or different kind of accident.

- (3) Involve a significant reduction in a margin of safety. Section 6.0 of the North Anna and Surry Technical Specifications does not have a basis description. The proposed administrative change does not affect equipment or its operation, and, thus, does not involve any reduction in the margin of safety.

Therefore, use of the proposed Technical Specification would not involve any reduction in the margin of safety.