

ATTACHMENT 3

PROPOSED ENVIRONMENTAL TECHNICAL SPECIFICATION CHANGE

NORTH ANNA UNITS NO. 1 AND NO. 2

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- c. Review of proposed written procedures required by Sections 5.5.2 and 5.5.3 below and changes thereto, which affect the environmental impact of the station.
- d. Review of proposed changes to station systems to determine the environmental impact of the changes.
- e. Investigation of all reported instances of violation of the Environmental Technical Specifications; and where the investigation indicates, evaluation and formulation of recommendations to prevent recurrence.
- f. Review of environmental monitoring programs to detect potential or existing significant adverse environmental impacts that have not been evaluated, or that are significantly greater than that evaluated by the Commission.

5.3.1.3 Authority

The SNSOC shall:

- a. Review the environmental evaluation of all changes described in Section 5.3.1.2 a, b and c, above. When the evaluation indicates that such activity may result in a significant adverse environmental impact that was not evaluated, or that is significantly greater than that evaluated by the Commission, the SNSOC shall ensure that a written evaluation of such activities is provided to and prior approval is obtained from the Director of Nuclear Reactor Regulation for the activities.
- b. If the SNSOC determines that unexpected harmful effects or evidence of irreversible damage are occurring as a result of operation of the station, the SNSOC shall ensure that an acceptable analysis of the problem and a plan of action to eliminate or significantly reduce the harmful effects or damage is submitted to the Commission for review and approval.
- c. Review written reports prepared as a result of investigations and reviews conducted under 5.3.1.2 a, e and f.

5.3.1.4 Records

The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the ~~Chairman of the System Nuclear Safety and Operating Committee (SyNSOC)~~. Director, Safety Evaluation and Control.

5.3.2 Quality Assurance Department
~~Supervisor, Quality Assurance, Operations and Maintenance~~

5.3.2.1 Function

Quality Assurance Department
The ~~Supervisor, Quality Assurance, Operations and Maintenance~~ shall perform independent audits of the implementation of the Environmental Technical Specifications.

5.3.2.2 Audits

The following audits shall be completed:

- a. The conformance of facility operation to provisions contained within these Environmental Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the facility staff involved in ensuring and monitoring compliance with these Environmental Technical Specifications at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect the environmental impact of the station at least once per 12 months.

5.3.2.3 Records

Provide a written report of the results of the audits required by 5.3.2.2 above to the SNSOC, the ~~SyNSOC~~ and the Station Manager.

5.3.3 Safety Evaluation and Control (SEC) ← SEC staff,
~~System Nuclear Safety and Operating Committee (SyNSOC)~~

5.3.3.1 Function

SEC staff
The ~~SyNSOC~~ as described in Section 6.5.2 of Appendix A of this license, shall function to provide independent review of designated activities related to the environmental impact of the station.

5.3.3.2 Review

SEC staff
The ~~SyNSOC~~ shall review and, where necessary, comment on the results of the reviews conducted by the SNSOC and the independent audits conducted by the ~~Supervisor, Quality Assurance, Operations and Maintenance~~.
Quality Assurance Department →

5.3.3.3 Responsibility , through appropriate reviews,
The ~~SyNSOC~~ ^{SEC staff} has the responsibility for ensuring that the station is operated in accordance with the requirements of this license and applicable NRC regulations.

5.3.3.4 Authority
The ~~SyNSOC~~ ^{SEC staff} shall report to and advise the ~~Executive Manager~~ ^{Manager, Nuclear Technical Services} Licensing and Quality Assurance, who shall advise the Executive Vice President-Power on those areas relating to the environmental impact of the station.

5.3.3.5 Records
~~The SyNSOC shall maintain written minutes of each meeting and a copy shall be provided to the committee members and the Executive Vice President Power on those areas relating to the environmental impact of the station.~~ SEE ATTACHED PAGE

5.4 State and Federal Permits and Certificates

The licensee shall comply with the provisions of the permits and certificates issued by the Commonwealth of Virginia to North Anna Power Station Under the provisions of Section 401 and 402 of the Federal Water Pollution Control Act, as amended.

5.5 Procedures

5.5.1 Written Procedures

Detailed written procedures, including applicable checklists and instructions, shall be prepared and followed for all activities involved in carrying out the Environmental Technical Specifications as defined in Sections 5.5.2, 5.5.3, and 5.5.4, below. Procedures shall include sampling, data recording and storage, instrument calibration, measurements and analyses, and actions to be taken when limits are approached or exceeded. Testing frequency of any alarm shall be included. These frequencies shall be determined from experience with similar instruments in similar environments and from manufacturer's technical manuals.

5.5.2 Operating Procedures

Plant standard operating procedures shall include provisions, in addition to the procedures specified in Section 5.5.1, to ensure that all plant systems and components are operated in compliance with the Limiting Conditions of Operations established as part of the Environmental Technical Specifications.

5.3.3.5

Records

Records of SEC activities relating to the environmental impact of the station shall be prepared and maintained in the SEC files and a summary shall be disseminated as indicated below each calendar month.

1. Executive Vice President - Power
2. Nuclear Power Station Managers
3. Manager, Nuclear Operations and Maintenance
4. Manager, Nuclear Technical Services
5. Executive Manager, Licensing and Quality Assurance
6. Others that the Director, Safety Evaluation and Control may designate.

- c. Review of proposed written procedures required by Sections 5.5.2 and 5.5.3 below and changes thereto, which affect the environmental impact of the station.
- d. Review of proposed changes to station systems to determine the environmental impact of the changes.
- e. Investigation of all reported instances of violation of the Environmental Technical Specifications; and where the investigation indicates, evaluation and formulation of recommendations to prevent recurrence.
- f. Review of environmental monitoring programs to detect potential or existing significant adverse environmental impacts that have not been evaluated, or that are significantly greater than that evaluated by the Commission.

5.3.1.3 Authority

The SNSOC shall:

- a. Review the environmental evaluation of all changes described in Section 5.3.1.2 a, b and c, above. When the evaluation indicates that such activity may result in a significant adverse environmental impact that was not evaluated, or that is significantly greater than that evaluated by the Commission, the SNSOC shall ensure that a written evaluation of such activities is provided to and prior approval is obtained from the Director of Nuclear Reactor Regulation for the activities.
- b. If the SNSOC determines that unexpected harmful effects or evidence of irreversible damage are occurring as a result of operation of the station, the SNSOC shall ensure that an acceptable analysis of the problem and a plan of action to eliminate or significantly reduce the harmful effects or damage is submitted to the Commission for review and approval.
- c. Review written reports prepared as a result of investigations and reviews conducted under 5.3.1.2 a, e and f.

5.3.1.4 Records

The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the ~~Chairman of the System Nuclear Safety and Operating Committee (SyNSOC)~~ Director, Safety Evaluation and Control.

5.3.2 Quality Assurance Department
~~Supervisor, Quality Assurance, Operations and Maintenance~~

5.3.2.1 Function

Quality Assurance Department
The ~~Supervisor, Quality Assurance, Operations and Maintenance~~ shall perform independent audits of the implementation of the Environmental Technical Specifications.

5.3.2.2 Audits

The following audits shall be completed:

- a. The conformance of facility operation to provisions contained within these Environmental Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the facility staff involved in ensuring and monitoring compliance with these Environmental Technical Specifications at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect the environmental impact of the station at least once per 12 months.

5.3.2.3 Records

Provide a written report of the results of the audits required by 5.3.2.2 above to the SNSOC, the ~~SyNSOC~~ and the Station Manager.

5.3.3 Safety Evaluation and Control (SEC) ← SEC staff
~~System Nuclear Safety and Operating Committee (SyNSOC)~~

5.3.3.1 Function

SEC staff
The ~~SyNSOC~~ as described in Section 6.5.2 of Appendix A of this license, shall function to provide independent review of designated activities related to the environmental impact of the station.

5.3.3.2 Review

SEC staff
The ~~SyNSOC~~ shall review and, where necessary, comment on the results of the reviews conducted by the SNSOC and the independent audits conducted by the ~~Supervisor, Quality Assurance, Operations and Maintenance~~. ← Quality Assurance Department.

5.3.3.3 Responsibility , through appropriate reviews,
SEC staff
The ~~SyNISOG~~ has the responsibility for ensuring that the station is operated in accordance with the requirements of this license and applicable NRC regulations.

5.3.3.4 Authority Manager, Nuclear Technical Services
SEC staff
The ~~SyNISOG~~ shall report to and advise the ~~Executive Manager Licensing and Quality Assurance~~, who shall advise the Executive Vice President-Power on those areas relating to the environmental impact of the station.

5.3.3.5 Records SEE ATTACHED PAGE
~~The SyNISOG shall maintain written minutes of each meeting and a copy shall be provided to the committee members and the Executive Vice President Power on those areas relating to the environmental impact of the station.~~

5.4 State and Federal Permits and Certificates

None

5.5 Procedures

5.5.1 Written Procedures

Detailed written procedures, including applicable checklists and instructions shall be prepared and followed for all activities involved in carrying out the Environmental Technical Specifications as defined in Sections 5.5.2, 5.5.3, and 5.5.4, below. Procedures shall include sampling, data recording and storage, instrument calibration, measurements and analyses, and actions to be taken when limits are approached or exceeded. Testing frequency of any alarm shall be included. These frequencies shall be determined from experience with similar instruments in similar environments and from manufacturer's technical manuals.

5.5.2 Operating Procedures

Plant standard operating procedures shall include provisions, in addition to the procedures specified in Section 5.5.1, to ensure that all plant systems and components are operated in compliance with the Limiting Conditions of Operations established as part of the Environmental Technical Specifications.

5.3.3.5

Records

Records of SEC activities relating to the environmental impact of the station shall be prepared and maintained in the SEC files and a summary shall be disseminated as indicated below each calendar month.

1. Executive Vice President - Power
2. Nuclear Power Station Managers
3. Manager, Nuclear Operations and Maintenance
4. Manager, Nuclear Technical Services
5. Executive Manager, Licensing and Quality Assurance
6. Others that the Director, Safety Evaluation and Control may designate.