Attachment 1

Proposed Technical Specification Change

North Anna Unit 1

Virginia Electric and Power Company

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).

ACTION statements for each of the applicable LCOs. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to be consistent with the ACTION statement for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components, and devices in the other division must be OPERABLE, or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source OPERABLE). In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components, and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, shutdown is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

4.0.3 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the operability requirements for a Limiting

Condition for Operation. Under the provisions of this specification, systems and components are assumed to be operable when surveillance requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are operable when they are found or known to be inoperable although still meeting the surveillance requirements. This specification also clarifies that the action statement requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the action statement requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the surveillance requirement within the allowable outage time limits of the action statement requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the operability requirements of a Limiting Condition for Operation. Futher, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10CFR50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the action statement requirements are less than 24 hours or a shutdown is required to comply with action statement requirements, e.g., Specification 3.0.3, a 24 hour allowance is provided to permit a delay in implementing the action statement requirements. This provides an adequate time limit to complete surveillance requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with action statement requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availabliity of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. If a surveillance is not completed within the 24 hour allowance, the time limits of the action statement requirements are applicable at the time. When a surveillance is performed within the 24 hour allowance and the surveillance requirements are not met, the time limits of the action statement requirements are applicable at the time that the surveillance is terminated.

Surveillance requirements do not have to be performed on inoperable equipment because the action statement requirements define the remedial measures that appply. However, the surveillance requirements have to be met to demonstrate that inoperable equipment has been restored to operable status.

Attachment 2

Proposed Technical Specification Change

North Anna Unit 2

Virginia Electric and Power Company

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).

consistent with the ACTION statement for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components, and devices in the other division must be OPERABLE, or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source OPERABLE). In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components, and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, shutdown is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

4.0.3 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the operability

requirements for a Limiting Codition for Operation. Under the provisions of this specification, systems and components are assumed to be operable when surveillance requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are operable when they are found or known to be inoperable although still meeting the surveillance requirements. This specification also clarifies that the action statement requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the action statement requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the surveillance requirement within the allowable outage time limits of the action statement requirements restores compliance with the requirements of Specification 4.0.2. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the operability requirements of a Limiting Condition for Operation. Futher, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10CFR50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the action statement requirements are less than 24 hours or a shutdown is required to comply with action statement requirements, e.g., Specification 3.0.3, a 24 hour allowance is provided to permit a delay in implementing the action statement requirements. This provides an adequate time limit to complete surveillance requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with action statement requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. If a surveillance is not completed within the 24 hour allowance, the time limits of the action statement requirements are applicable at the time. When a surveillance is performed within the 24 hour allowance and the surveillance requirements are not met, the time limits of the action statement requirements are applicable at the time that the surveillance is terminated.

Surveillance requirements do not have to be performed on inoperable equipment because the action statement requirements define the remedial measures that apply. However, the surveillance requirements have to be met to demonstrate that inoperable equipment has been restored to operable status.

Attachment 3

Discussion of Proposed Change

and

Significant Hazards Considerations Evaluation

North Anna Units 1 and 2

Virginia Electric and Power Company

Discussion of Proposed Change and Significant Hazards Considerations Evaluation

Introduction and Background

Specification 4.0.2 of the North Anna Technical Specifications permits surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillance activities to be postponed when plant conditions are not suitable for conducting the surveillance, for example, under transient conditions or other ongoing surveillance or maintenance activities. Specification 4.0.2 also limits extending surveillances so that the combined time interval for any three consecutive surveillance intervals do not exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent. As currently expressed, this specification is consistent with the Standard Technical Specifications for Westinghouse Pressurized Water Reactors, NUREG-0452, Revision 4.

On August 21, 1989, the NRC issued Generic Letter 89-14 which provides guidance to licensees for proposing a license amendment to implement removal of the 3.25 limitation for three consecutive surveillance intervals. The NRC considers this to a line-item improvement to the Technical Specifications. The revised specification will remove an unnecessary restriction on extending surveillance requirements and will result in a benefit to safety when plant conditions are not conducive to the safe conduct of surveillance requirements. The removal of the 3.25 limit will provide greater flexibility in the use of the provision for extending surveillance intervals, reduce the administrative burden associated with its use, and have a positive effect on safety.

Revised TS 4.0.3 permits delaying the requirement of an action statement for up to 24 hours to permit the completion of a missed surveillance when the allowable outage time limits of the action statement are less than 24 hours or require a shutdown. As discussed in Generic Letter 87-09, it is overly conservative to assume that systems or components are immediately inoperable because a surveillance requirement has not been performed. Generally, the oposite is in fact the case. The vast majority of surveillances confirm that the tested system or component is within requirements and operable. When a surveillance is missed, it is this positive verification of operability that has not been confirmed by the performance of the required surveillance. Because the allowable outage time limits of some action statements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements may apply, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. Generic Letter 87-09 states that, based on these considerations, 24 hours is an acceptable time limit for completing a missed surveillance when the allowable outage times of the action statements are less than this time limit or when shutdown action statements

apply. The Generic Letter concludes that the 24 hour time limit adequately balances the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with action statements before the surveillance can be completed.

Discussion of the Proposed Changes

Subparagraph (b) of Specification 4.0.2 referring to the 3.25 times the surveillance interval for any 3 consecutive surveillance intervals has been removed and the remaining paragraph has been reformatted to read as follows:

> 4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval.

Likewise, the associated Technical Specification Bases are revised to remove reference to the 3.25 times the surveillance interval limit for any three consecutive surveillance intervals and therefore are modified to read as follows:

> 4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

These proposed Technical Specification changes are consistent with the guidance provided in NRC Generic Letter 89-14 and NRC Generic Letter 87-09. Approval of the change request will produce the following benefits:

1. Facilitates scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not conducive to the safe conduct of the surveillance.

2. Reduces the potential for unnecessary forced shutdowns to perform surveillance activities.

3. Eliminates the administrative and logistical burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit.

An added benefit will exist with the reduction in need for exigent requests of the NRC for surveillance interval extensions.

Safety Evaluation

SAFETY EVALUATION FOR 3.25 SURVEILLANCE LIMIT

Many surveillances have a specified surveillance interval of 18 months. Generally, the 18-month surveillance interval is intended to allow the surveillance activity be performed when the unit is shutdown during a refueling outage. Therefore, the actual time interval for performance of these surveillances is dependent on the length of a fuel cycle, but it cannot exceed 18 months plus the 25 percent allowance. The safety benefit of performing these surveillances during a plant shutdown is that systems do not have to be removed from service at a time that they are required to be operable. This minimizes the amount of time which systems are unavailable during power operation due to surveillance requirements, thereby minimizing the impact on safety. In some instances, the Technical Specifications specifically require surveillances to be performed during a plant shutdown. When a limit is reached on extending an 18-month interval, a forced plant shutdown to performed these surveillances is generally the only alternative short of a license amendment that defers the performance of these surveillances until the end of the fuel cycle.

Usually, the length of a fuel cycle does not exceed 18 months by more than the 25 percent allowance (i.e., 4-1/2 months). A more common situation has been to encounter the 3.25 limit on the combined time interval for three consecutive surveillance intervals. The NRC staff has normally approved one-time Technical Specification change requests to waive performance of certain 18-month surveillance activities until the end of the fuel cycle when the surveillance intervals would exceed the 3.25 limit yet would not exceed the 25 percent allowance for extending the 18-month surveillance interval. A forced shutdown to perform these surveillances and avoid exceeding the 3.25 limit is not justified from a risk standpoint when extending these surveillance intervals is within the 25 percent allowance. The 18-month surveillances are normally performed during a refueling outage when the plant is in a desirable condition for conducting these surveillances. As stated in the NRC's Safety Evaluation for Commonwealth Edison's LaSalle Station, the risk of performing some of these surveillances during plant operations has been determined to be greater than the impact on safety of exceeding the 3.25 limit.

In addition to its application to refueling outage surveillances described above, the use of the 25 percent allowance for extending surveillance intervals can provide a safety benefit when it is used during plant operation. When plant conditions are not suitable for the safe conduct of surveillances due to equipment out-of-service, maintenance, or other ongoing surveillance activities, safety is enhanced by the use of the allowance that permits a surveillance interval to be extended. In such cases, the safety benefit obtained by extending a surveillance interval up to 25 percent would exceed the risk

reduction derived by conforming to the 3.25 limitation.

In summary, based on the above considerations, the removal of the 3.25 times the surveillance interval limit for any three consecutive surveillance intervals will have an overall positive impact on safety. Virginia Electric and Power Company believes there is reasonable assurance that the proposed change will not adversely affect the health and safety of the public.

SAFETY EVALUATION FOR 24 HOUR SURVEILLANCE REQUIREMENT

Inclusion of these requirements serves to clarify the Technical Specifications and establish more specific guidance for plant operations. Generic Letter 87-09 has stated that is is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. Therefore, delay of up to 24 hours to permit completion of a missed surveillance is allowed. The generic letter also states that the 24 hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with plant upset and challenge to safety systems when the alternative is shut down.

In summary, based on the above, the delay of up to 24 hours to permit completion of a missed surveillance will have an overall positive impact on safety. Virginia Electric and Power Company believes there is reasonable assurance that the proposed change will not adversely affect the health and safety of the public.

Significant Hazards Considerations Evaluation

It has been determined that the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92. This determination was based on the following points.

1. **Accident Probability or Consequence Increase.** The proposed changes have no adverse impact upon potential accident probability or consequence. Only surveillance requirements are changed, and no new or unique accident precursors are introduced by these changes in surveillance requirements. In fact, the proposed admendment will not significantly affect equipment reliability and does not affect the probability or consequences of accidents previously evaluated in the UFSAR.

   The 3.25 surveillance interval will still be constrained by the 25 percent interval extension criteria of Technical Specification 4.0.2. The risk involved with the alternatives to perform 18-month surveillances during plant operation or to impose a forced shutdown to perform the surveillances are greater than the risk involved with exceeding the 3.25 limit. When plant conditions are not conducive for the safe conduct of surveillances due to safety systems being out-of-service for maintenance or due to other ongoing surveillance activities, safety is enhanced by the use of the allowance that permits a surveillance interval to be extended.

   Completion of the required surveillance according to the proposed technical

specification 4.0.3 determines operability within the established 24 hour time limit and compensates for the risks associated with plant upset and challenges to safety systems that would result from a required shutdown. These changes do not provide any means to create accident consequences beyond those previously evaluated.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. **Accident Probability Creation.** Since the implementation of the proposed change to the surveillance requirements will require no hardware modifications (i.e., alterations to plant configuration), operation with these proposed Technical Specifications does not create the possibility for any new or different kind of accident which has not already been evaluated in the Updated Final Safety Analysis Report (UFSAR). The proposed revision to the Technical Specifications will not result in any physical alteration to any plant system, nor would there be a change in the method by which any safety related system performs its function. In fact, this proposed change facilitates the scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not suitable for conducting the surveillance thereby reducing the possibility for creation of an accident.

   Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Safety Margin Reduction.** The results of the accident analyses which are documented in the UFSAR continue to bound operation under the proposed changes, so that there is no safety margin reduction.

   Deletion of the requirement that any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval will no significantly affect equipment reliability, rather it will reduce the potential to interrupt normal plant operations due to surveillance scheduling. This proposed exemption will allow all surveillance intervals to be constrained by the maximum allowable extension of 25 percent of the specified surveillance interval, which may enhance safety when used during plant operation.

   For the changes intended to achieve consistency with the recommendations of Generic Letter 87-09 "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," the NRC Staff has previously evaluated these changes in the generic letter and determined that the modifications will result in improved technical specifications.

   It is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. A 24 hour time limit has been included in Specificaion 4.0.3 allowing a delay of the required actions to permit the performance of the missed surveillance. The NRC has concluded that the 24 hour time limit would balance the risks associated with an allowance

for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is to shut down to comply with action statement requirements before the surveillance can be completed.

The NRC has concluded that the potential for a plant upset and challenge to safety systems is heightened if surveillances are performed during a shutdown to comply with action statement requirements.

In addition, the delay of up to 24 hours to permit completion of a missed surveillance is of the type described in the Federal Register Notice of March 6, 1986 (51 FR 7744) as an example of amendments that are considered not likely to involve significant hazards considerations. In particular, example (ii) applies to this change request by describing a change that constitutes additional limitations, restrictions, or controls not presently included in the technical specifications.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, we have determined that the amendment request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety; and therefore does not involve a significant hazards consideration.