

DS09

620

T. Dunning

5000 Dominion Boulevard
Glen Allen, Virginia 23060

58FR18118

4/7/93

USNRC
OFFICE OF ADMINISTRATION

'93 MAY 21 AIO:55



VIRGINIA POWER

May 19, 1993

Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 93-305
NL&P/RBP

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
COMMENTS ON PROPOSED GENERIC LETTER FOR
RELOCATION OF THE TECHNICAL SPECIFICATION TABLES ON
INSTRUMENT RESPONSE TIME LIMITS

Virginia Power has reviewed the Nuclear Regulatory Commission's (NRC's) Federal Register notice dated April 7, 1993 which proposed to issue a generic letter providing guidance for the voluntary relocation of tables for instrument response time limits from Technical Specifications to the Updated Final Safety Analysis Report (UFSAR). Relocating the tables for reactor trip system and engineered safety feature actuation system instrument response times from the Technical Specifications to the UFSAR will not alter these surveillance requirements. However, the proposed change will allow the licensee to administratively control changes to response time limits in accordance with 10 CFR 50.59 without the need to process a license amendment request.

We endorse the proposed generic letter and believe that the proposed change will result in an improved usage of Technical Specification. The NRC staff should be commended for the proposed generic letter as it provides both a human factors improvement to Technical Specifications while also providing a reduction in regulatory requirements that are burdensome and unnecessary.

Very truly yours,

M. L. Bowling, Manager
Nuclear Licensing and Programs

9305250175 930519
PDR PR
50 58FR18118 PDR