

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 8, 1993

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

Serial No. 93-405
NL&P/EJW
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 and 2
PROPOSED TECHNICAL SPECIFICATIONS CHANGES
ADMINISTRATIVE CONTROLS - PERIODIC REVIEWS OF PROCEDURES

Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications, to Facility Operating License Nos. NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively. The proposed changes will delete the requirement to periodically review certain administrative and technical procedures. Reviews of those procedures which are symptom based, event driven, or otherwise required by regulations and other Company commitments would continue to be performed, and the requirements for those reviews are unaffected by these proposed changes. These changes would considerably reduce the resources needed to perform routine periodic reviews of procedures without any corresponding reduction in nuclear safety.

A discussion of the proposed Technical Specifications changes is provided in Attachment 1. The proposed Technical Specifications changes are provided in Attachment 2. It has been determined that the proposed Technical Specifications changes do not involve a reviewed 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 these 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 Committee and the Management Safety Review Committee.

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

Very truly yours,

W. L. Stewart

W. L. Stewart
Senior Vice President - Nuclear

Attachments

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

Commissioner
Department of Health
Room 400
109 Governor Street
Richmond, Virginia 23219

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by R. F. Saunders, who is Assistant Vice President - Nuclear Operations, for W. L. Stewart 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 8TH day of July, 1993.

My Commission Expires: May 31, 1994.

Vicki L. Hull
Notary Public

(SEAL)

Attachment 1
Discussion of Changes

Discussion of Changes

Introduction

Currently, Technical Specification 6.8.2 in the Administrative Controls section of the North Anna Technical Specifications (TS) requires that procedures "be reviewed periodically as set forth in administrative procedures." This requirement specifically excludes implementation procedures associated with the Emergency Plan, Security Plan, and Fire Protection Program which are required to be reviewed annually by the Code of Federal Regulations.

The purpose of these periodic reviews is to systematically ensure that procedures in current use provide the best possible instructions for performance of safety-related activities. However, the procedure upgrade/revision process which has been implemented at Virginia Power's nuclear facilities already accomplishes this objective in an effective manner without utilizing periodic reviews. As such, the program for periodic reviews of administrative and technical procedures is a redundant process which is no longer necessary.

The proposed change deletes the Technical Specification requirement for routine periodic reviews of administrative and technical procedures, as justified by the controls established and effectively implemented for procedure upgrades and revisions.

Background

As committed to in the Operational Quality Assurance Program, ANSI N18.7-1976 required that all safety-related procedures be reviewed "no less frequently than every two years" by an individual knowledgeable in the area affected by each procedure. However, the ANSI standard allows modification of this requirement based on such attributes as operational maturity of the plant, type and complexity of the activity involved, and establishment of a program which provides a systematic review and feedback of information based on procedure usage. Similarly, the NRC has recently issued internal guidelines describing acceptable attributes of licensee proposed alternative procedure control programs.

In 1992, Virginia Power made the interpretation that the biennial reviews were established to require new plants to review procedures more often than a plant which has reached operational maturity. After effectively operating for more than a decade, the focus on procedures should change to maintaining the procedures through systematic feedback. The frequency for reviewing procedures was thereby altered, and subsequently approved by the NRC, from two years to four years.

The current program for upgrading and revising administrative and technical procedures involves numerous checks and balances to ensure the adequacy and accuracy of procedures. The program also requires significant levels of review from various sources as discussed below:

- (1) The NRC-approved Operational Quality Assurance Program and administrative controls require applicable procedures, as determined by Station Management, to be reviewed following an accident, an unexpected transient, significant operator error, or equipment malfunction.
- (2) Plant personnel are trained and directed to report any deficiencies or concerns that prevent or adversely affect the use of procedures. This feedback may be initiated through either the Deficiency Feedback Forms or through Procedure Action Requests (PARs). Changes initiated are required to be reviewed by the cognizant supervisor to ensure that the change is appropriate, properly classified, accurate, and does not conflict with the remainder of the procedure.
- (3) The Design Change Process requires identification of all procedures potentially affected by a plant modification. Necessary procedure changes are required to be implemented upon the completion of the modification.
- (4) The Operational Experience Review (OER) Program requires Operating Experience (OE) documents to be reviewed for potential impact on the nuclear facility's activities. This includes an evaluation of applicable procedures and the initiation of any required procedure changes.
- (5) Technical Specification change packages are routed through applicable departments for initial review and concurrence prior to submittal to the NRC. These departments are required to identify and initiate any changes to procedures that result from NRC-approved Technical Specification changes.
- (6) The administrative controls governing the Periodic Test Program provide directions for the performer to evaluate the need for a PAR if a change is identified during the performance of a periodic test procedure.
- (7) The Licensed Operator Requalification Program (LORP) provides formal processes to resolve potential deficiencies identified during simulator and classroom training. This includes procedure revisions, if appropriate.
- (8) Guidance is provided in administrative controls for adequately researching potential procedure revisions, and multiple reviews are required for each procedure prior to approval or implementation including technical review, validation review (by someone other than the writer), and responsible department review.
- (9) Quality Assurance audits provide independent evaluations of procedures in those areas being audited to ensure that those procedures adequately reflect the appropriate program's requirements.
- (10) An assessment is accomplished by an independent group to evaluate the performance of the Procedure Upgrade/Revision Program.

- (11) Advances in technology have allowed a substantial decrease in the time required to process procedure revisions significant to the operability of the nuclear plants.

These reviews, audits, and assessments (coupled with strong management oversight) of the Procedure Upgrade/Revision Program effectively negate any benefit derived from formal periodic reviews of routine administrative and technical procedures. The Procedure Upgrade/Revision Program, with the routine periodic reviews of most procedures eliminated, also complies with guidance provided by the Office of Nuclear Reactor Regulation to the NRC Regional Directors for each region's Division of Reactor Safety in December, 1992.

As mentioned above, certain symptom and event driven procedures will continue to be reviewed periodically as required by the Code of Federal Regulations and/or other commitments. These procedures are listed below:

- Emergency Plan Implementing Procedures (EPIPs),
- Security Plan Implementing Procedures (SPIPs),
- Security Contingency Plan Implementing Procedures (SCIPs),
- Abnormal Procedures (APs),
- Annunciator Response Procedures (ARs),
- Emergency Operating Procedures (EOPs),
- Fire Protection Plan,
- Oil Spill Prevention, Control, and Countermeasure (SPCC) Plan, and
- Other procedures which have specific regulatory requirements for periodic reviews.

Currently, approximately 6,064 operating, maintenance, test, surveillance, and administrative procedures require periodic reviews at North Anna Power Station. About 5,000 of those procedures will be directly affected by this proposed change, thus saving an estimated 10,000 manhours over four years (2,500 manhours per year).

Description Of Specific Changes

The proposed amendment would eliminate the Technical Specification requirement to periodically review most administrative and technical procedures. Specifically, the North Anna Unit 1 and Unit 2 Technical Specifications are revised as follows:

- North Anna Unit 1 Technical Specification 6.8.2 is revised to delete the phrase "and reviewed periodically" in the first sentence.
- North Anna Unit 2 Technical Specification 6.8.2 is revised to delete the phrase "and reviewed periodically" in the first sentence.

Safety Significance

Elimination of the Technical Specification 6.8.2 requirement for periodic reviews of procedures will only affect routine administrative and technical procedures, and necessary revisions and upgrades of those procedures will continue to be detailed and thorough. Procedures which will not be affected include those used to control abnormal, offnormal, or alarm conditions and those used for combating emergencies and other significant events which are governed by regulations, NRC approved programs, and/or prior Company commitments.

The probability that an accident will occur will neither be increased nor decreased by this proposed Technical Specification change. This proposed change has 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 this change. Plant structures, systems, and components are not affected by the proposed change. As such, the consequences of a malfunction of equipment important to safety previously evaluated in the UFSAR are not increased by this change.

Periodic reviews of routine administrative and technical procedures do not contribute to the initiation of accidents nor to the mitigation of the consequences thereof. The periodic reviews of those procedures which could affect the initiation and consequences of an accident are explicitly excluded from the proposed Technical Specification change. Subsequently, the proposed change to Technical Specification 6.8.2 neither produces a new accident scenario nor produces a previously unanalyzed type of equipment malfunction.

Only the frequency of routine periodic reviews of certain administrative and technical procedures is affected, not the design nor the operation of facility structures, systems, or components. This being the case, no margin of safety is applicable to this change request.

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