

Attachment 2  
Technical Specifications Changes

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## ADMINISTRATIVE CONTROLS

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- c. Surveillance and test activities of safety-related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.
- i. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 Each procedure of 6.8.1 above, except 6.8.1.d, 6.8.1.e, and 6.8.1.f and changes thereto, shall be reviewed and approved by the SNSOC prior to implementation as set forth in administrative procedures. Procedures of 6.8.1.d, 6.8.1.e, and 6.8.1.f shall be reviewed and approved as per 6.5.1.6.i, 6.5.1.6.j, and 6.5.1.6.m. SNSOC approval shall be certified in writing by an Assistant Station Manager.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed, and approved by the SNSOC within 14 days of implementation. SNSOC approval shall be certified in writing by an Assistant Station Manager.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation spray, safety injection, chemical and volume control, gas stripper, and hydrogen recombiners. The program shall include the following:

- (i) Preventive maintenance and periodic visual inspection requirements, and
- (ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

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Attachment 3

Significant Hazards Consideration

## SIGNIFICANT HAZARDS CONSIDERATION

Technical Specification 6.8.2 specifies that the procedures prescribed in Technical Specification 6.8.1 "and changes thereto, shall be reviewed and approved by the SNSOC prior to implementation and reviewed periodically as set forth in administrative procedures." This provision applies to procedures which describe and are used for administrative controls, maintenance, surveillance testing, operations, calibration, chemistry control, health physics and radiological protection, and refueling operations. The periodic review of these procedures is intended to ensure that procedures are maintained adequate to control those activities, technically and philosophically accurate, and current as necessary to incorporate design modifications, technical bulletins, manufacturer updates, and industry experience.

The proposed Technical Specification (TS) changes delete these periodic reviews because the established procedure upgrade/revision program effectively accomplishes these goals. Numerous checks and balances ensure that procedures are maintained adequate, accurate, and up-to-date including routine inputs from the design change process, day-to-day activities, reviews after any unplanned transient, operational experience review program, TS change packages, licensed Operator requalification program, and independent assessments/audits of the procedure review, revision, and upgrade program. The proposed changes do not directly affect the operation, maintenance, reliability, or testing of plant structures, systems, and components. As such, formal periodic reviews of procedures have no significant impact upon the safe and reliable operation of the nuclear facility.

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 North Anna Power Station in accordance with the TS changes will not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The likelihood that an accident will occur is neither increased or decreased by eliminating the periodic reviews of routine administrative and technical procedures. Sufficient controls are established to ensure that procedures impacting safety-related structures, systems, and components are maintained current, accurate, and usable. This TS change will therefore not impact the function or method of operation of plant equipment. Thus, a significant increase in the probability of a previously analyzed accident will not occur due to this change. No systems, equipment, or components are affected by the proposed changes. Thus, the consequences of a malfunction of equipment important to safety previously evaluated in the UFSAR are not increased by this change.

The proposed changes do not affect equipment or its operation, and, thus, do not affect the probabilities or consequences of an accident.

Therefore, we conclude that this change does not significantly increase the probabilities or consequences of an accident.

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve changes to the physical plant or operations. Since periodic procedure reviews do not contribute to accident initiation, a change related to such an activity does not produce a new accident scenario or produce a new type of equipment malfunction. Also, this change does not alter any existing accident scenarios. The proposed changes do not affect equipment or its operation, and, thus, do not create the possibility of a new or different kind of accident.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident.

- (3) Involve a significant reduction in a margin of safety. Technical Specification 6.8.2 does not have a basis description. The proposed changes do not affect equipment or its operation, and, thus, do 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.

Virginia Electric and Power Company concludes that the activities associated with these proposed TS changes satisfy the no significant hazards consideration criteria of 10 CFR 50.92 and, accordingly, a no significant hazards consideration finding is justified.