



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

TECHNICAL SPECIFICATION CHANGE

VIRGINIA ELECTRIC AND POWER COMPANY

NORTH ANNA UNITS 1 & 2 AND SURRY UNITS 1 & 2

DOCKET NOS. 50-338/339 AND 50-280/281

1.0 INTRODUCTION

By letter dated July 20, 1993, Virginia Electric and Power Company (Virginia Power) requested changes to the Administrative Controls Section of the Technical Specifications (TS) for North Anna Units 1 & 2 and Surry Units 1 & 2. The substance of the changes is to delete the audit frequencies and Station Nuclear Safety and Operating Committee (SNSOC) review of the Emergency and Security Plans from the TS. The following description and evaluation apply to both Surry Units 1 & 2 and North Anna Units 1 & 2, except where noted, since the wording of the TS for both sites is nearly identical, except for Section numbers.

2.0 EVALUATION

a. Sections 6.1.C.1.f.9 & 10 (Surry), Sections 6.5.1.6.i & j (North Anna) - SNSOC Responsibilities - Virginia Power proposes to delete the requirement for the SNSOC to review the Plant Security Plan and the Emergency Plan (EP) and their implementing procedures.

The requirement to review the facilities' EP and implementing procedures and submit recommended changes to the Station Manager is maintained in Section 8.2.1 of each facility's EP.

For this and the following proposed changes, where a requirement is being deleted from the Surry or North Anna TS because it is redundant to the facility's EP, we note that 10 CFR 50.54(q) states in part "A licensee ... shall follow and maintain in effect emergency plans ..." ; "...licensee may make changes to these plans without Commission approval only if the changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet ..." ; and "Proposed changes that decrease the effectiveness of the approved emergency plan may not be implemented without application to and approval by the Commission."

The staff finds these changes acceptable as these requirements are in the facilities' Emergency Plan and Physical Security Plans and these changes are consistent with Section 5.5.1 of the Improved Standard Technical Specifications (ISTS).

b. Sections 6.1.C.2.h.1, 6.1.C.2.h.2, 6.1.C.2.h.11, 6.1.C.2.h.12 and 6.1.C.2.h.13 (Surry), Sections 6.5.2.8.a, 6.5.2.8.b, 6.5.2.8.k, 6.5.2.8.l and 6.5.2.8.m (North Anna) - Management Safety Review Committee (MSRC) Audits - Virginia Power proposes to delete the audit frequency of "at least once per 12 months." Sections 6.1.C.2.h.3 (Surry) and 6.5.2.8.c (North Anna) - MSRC Audits - Virginia Power proposes to delete the audit frequency of "at least once per 6 months." Sections 6.1.C.2.h.4 and 6.1.C.2.h.8 (Surry) and 6.5.2.8.d and 6.5.2.8.h (North Anna) - MSRC Audits - Virginia Power proposes to delete the audit frequency of "at least once per 24 months." Sections 6.1.C.2.h.9 (Surry) and 6.5.2.8.i (North Anna) - MSRC Audits - Virginia Power proposes to delete the term "annually" and reword these sections to also capture the substance of Sections 6.1.C.2.h.10 (Surry) and 6.5.2.8.j (North Anna). Section 6.1.C.2.h.10 (Surry) - MSRC Audits - Virginia Power has proposed to delete the phrase "at intervals no greater than 3 years," and combine this section with Section 6.1.C.2.h.9. Section 6.5.2.8.j (North Anna) - MSRC Audits - Virginia Power proposes to delete this section and combine the inspection and audit requirements, less the audit frequency, with Section 6.5.2.8.i.

The staff finds these changes acceptable as they are consistent with Section 5.5.2 of the ISTS.

c. Sections 6.1.C.2.h.5, 6.1.C.2.h.6 (Surry) and 6.5.2.8.e, 6.5.2.8.f (North Anna) - MSRC Audits - Virginia Power proposes to delete these audits which are with respect to the Emergency Plan and the Security Plan since these audits are specified in the respective Plans.

The TS requirement to audit the EP and implementing procedures at least once per 12 months is redundant to 10 CFR 50.54(t) which states an independent review and audit of the emergency program is to be conducted at least every 12 months. Additionally, Section 8.9 of each facility's EP states, in part, that an independent review of the emergency preparedness program shall be conducted at least once every 12 months in accordance with 10 CFR 50.54(t).

We find these changes acceptable as the requirement for the independent review and audit of the Emergency Program is redundant to 10 CFR 50.54(t) and is maintained in each facility's EP. In addition, the proposed changes are consistent with Section 5.5.2 of the ISTS.

d. As a consequence of deletions and the combining of sections, the sections have been renumbered and/or relettered.

The staff finds these changes acceptable as they are editorial in nature.

e. Section 6.8.2 (North Anna) - Procedures - Virginia Power proposes to revise this section to require approval of the facility's Security Plan and Emergency Plan as stated within the Plans in lieu of approval by the SNSOC. In Section 8.2.1 of the North Anna EP, the review and approval of the EP and implementing procedures is specified as discussed in 2.a above.

We find the change acceptable for the same reason set forth in 2.a above and it is consistent with Section 5.5.2 of the ISTS.

f. Sections 6.5.B.10, 6.5.B.11 (Surry) and 6.10.1.i, 6.10.1.j (North Anna) - Records Retention - Virginia Power proposes to revise this section to delete the phrase "of the annual audit" and to add the word "audits."

Under Section 6.5, "Station Operating Records," Section 6.5.B of the Surry TS, it is specified that records relative to specific items as listed in this section are to be retained for the life of the plant. One of these items, TS 6.5.B.10, states that this includes records of the annual audit of the Station Emergency Plan and implementing procedures. The proposed change deletes "annual audit of the" and the word "audit" is to be inserted at the end of the sentence such that it would read:

"10. Records of the Station Emergency Plan and implementing procedures audit."

In 10 CFR 50.54(t), which provides for the independent review of the emergency preparedness program, it is specified that "... The results of the review, ... shall be documented ... and retained for a period of five years." The Surry TS indicate that these records will be retained for the life of the plant.

The deletion of the word "annual" indicates that all reviews of the emergency preparedness program are to be retained for the life of the plant. Additionally, the requirement to retain records of the review of the Emergency Preparedness program for 5 years is specified in Section 8.9 of the Surry EP. Under Section 6.10 "Record Retention," of the North Anna TS, these same changes are proposed for TS 6.10.1.i. However, North Anna TS Subsection 6.10.1 indicates that the records of the EP and implementing procedures review are records to be retained for at least 5 years. Section 8.9 of the North Anna EP specifies that the following records shall be filed in Station Records and maintained for 5 years:

- a) The review results and recommended improvements
- b) The answers to the recommended improvements
- c) A description of the corrective actions taken

We find the changes in the Surry TS acceptable because the requirement for the retention of the review of the Emergency Preparedness program for the life of the plant is more stringent than that specified in the regulations. We find the changes in the North Anna TS acceptable because the requirement for retention of the Emergency Plan and implementing procedures review records for 5 years is commensurate with the regulatory requirement. In addition, the changes are acceptable as they reflect the other changes that deleted annual audits.

g. In Section 6.4.H of the Surry TS, the sentence "An annual review of the Emergency Plan will be performed." is to be deleted. Section 8.2.1 of the Surry EP states that the Station Coordinator, Emergency Planning, shall review the Surry EP and its implementing procedures at least every 12 months and certify that they are adequate and current.

We find this change acceptable as the requirement for the annual review of the EP is maintained in the Surry EP.

h. Surry TS Section 6.4.I required implementation of an industrial security program and performance of an annual review of the program. The licensee has proposed deleting TS 6.4.I since the requirements for these activities are stated in the CFR and are included in the Surry Power Station Security Plan.

We find this change acceptable as the requirements for the activities are stated in the CFR and are included in the Surry Power Station Security Plan.

i. Surry TS Section 6.4.J required implementation of the fire protection program and implementing procedures. This section also required a review of the program at least once every two years. The licensee has proposed deleting TS 6.4.J since the requirements exist in other documents and, therefore, the requirements are neither altered nor diminished.

We find this change acceptable since the requirements for the activities are stated in the CFR and Surry license condition 3.I.

3.0 CONCLUSION

We find the requested changes acceptable as they reflect the ISTS and the appropriate part of Section 17.3 of NUREG-0800, the Standard Review Plan. In many cases, the requirements that are being deleted from TS exist outside of TS and changes to the requirements are controlled by means acceptable to the staff.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Virginia State official was notified of the proposed issuance of the amendments. The State official had no comment.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR

51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments (58 FR 46242).

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Date: March 1, 1994