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LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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REACTOR COOLANT SYSTEM

3/4.4.10 STRUCTURAL INTEGRITY

ASME CODE CLASS 1,2 & 3 COMPONENTS

LIMITING CONDITION FOR OPERATION

3.4.10.1 The structural integrity of ASME Code Class 1, 2 and 3 components shall be maintained in accordance with Specification 4.4.10.1.

APPLICABILITY: ALL MODES.

ACTION:

- a. With the structural integrity of any ASME Code Class 1 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature more than 50°F above the minimum temperature required by NDT considerations.
- b. With the structural integrity of any ASME Code Class 2 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature above 200°F.
- c. With the structural integrity of any ASME Code Class 3 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) from service.
- d. The provisions of Specification 3.0.4 are not applicable.

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS

4.4.10.1 In addition to the requirements of Specification 4.0.5, the Reactor Coolant pump flywheels shall be inspected per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

INSTRUMENTATION

BASES

3/4.3.3.6 POST-ACCIDENT INSTRUMENTATION

The OPERABILITY of the post-accident instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident.

3/4.3.3.7 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages. Prompt detection of fires will reduce the potential for damage to safety related equipment and is an integral element in the overall facility fire protection program.

In the event that a portion of the fire detection instrumentation is inoperable, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to OPERABILITY.

3/4.3.3.8 AXIAL POWER DISTRIBUTION MONITORING SYSTEM (APDMS)

OPERABILITY of the APDMS ensures that sufficient capability is available for the measurement of the neutron flux spatial distribution within the reactor core. This capability is required to (1) monitor the core flux patterns that are representative of the peak core power density, and (2) limit the core average axial power profile such that the total power peaking factor F_Q is maintained within acceptable limits.

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGES

Currently North Anna Unit 1 has Technical Specification requirements (T.S. 3.4.10.1.d and T.S. 4.4.10.1) to ultrasonically examine flow straighteners whenever a reactor coolant pump shaft deflection of greater than 20 mils is indicated and at least once per 18 months. There is also a requirement (T. S. 3.3.3.9) to have a Loose Parts Monitoring System to promptly detect any loose parts.

The proposed change is to delete the Technical Specification requirements to ultrasonically examine flow straighteners and to delete the Technical Specification requirements for the Loose Parts Monitoring System.

In Amendment No. 10 to the North Anna Unit 1 Facility Operating License, dated April 27, 1979, the Nuclear Regulatory Commission determined that ultrasonic examinations of flow straighteners would be necessary to monitor the flaws that have occurred in the flow straighteners. It was also determined that the Loose Parts Monitoring System would promptly detect any migrating portion of a failed flow straightener.

During the current North Anna Unit 1 refueling and maintenance outage, the flow straighteners from reactor coolant loops A, B and C were removed from the RCS piping elbows. Since the flow straighteners have been removed and the potential for failed flow straighteners has now disappeared, it is now unnecessary to ultrasonically examine the flow straightener area. It is also unnecessary for the Loose Parts Monitoring System since the purpose of the Loose Parts Monitoring System was to detect a migrating flow straightener.

It should be noted that the request to delete the Loose Parts Monitoring System is only to delete it as a Limiting Condition for Operation. The Loose Parts Monitoring System will continue to be used and will periodically tested.

The probability of occurrence or the consequences of a malfunction of equipment important to safety and previously evaluated in the FSAR is not increased because all flow straighteners have been removed from the reactor coolant system piping.

The possibility of a different type of accident or malfunction that was previously evaluated in the FSAR has not been created due to the removal of the flow straighteners. The removal of the flow straighteners completely eliminates the possibility of a flow straightener malfunction.

The margin of safety as described in the BASIS section of any part of the Technical Specifications is not reduced due to the removal of the flow straighteners. The margin of safety has increased by removing the flawed flow straighteners. The margin of safety is not reduced due to deleting the requirement to ultrasonically examine the flow straighteners and deleting the requirement for the Loose Parts Monitoring System due to the removal of all the flow straighteners.

COMMONWEALTH OF VIRGINIA)
)
CITY OF RICHMOND)

The foregoing document was acknowledged before me, in and for the City and Commonwealth aforesaid, today by W. L. Stewart, who is Vice President-Nuclear Operations, of the 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 12th day of November, 19 82.

My Commission expires: 2-26, 19 85.

Ann C. Mason
Notary Public

(SEAL)

M2/004