

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 9, 1994

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

Serial No. 94-350
NL&P/GSS
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

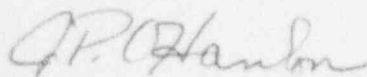
VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATIONS CHANGES
RELOCATION OF INSTRUMENT RESPONSE TIME LIMITS

Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications, to Operating License Numbers NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively. The proposed changes will relocate the Technical Specifications tables of the response time limits for the Reactor Trip System and the Engineered Safety Feature Actuation System. These changes are considered line-item improvements as identified in NRC Generic Letter 93-08.

A discussion of the proposed Technical Specifications changes is provided in Attachment 1. The proposed Technical Specifications changes are presented in Attachment 2. It has been determined that the proposed Technical Specifications changes do not involve an unreviewed 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 the 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.

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

Very truly yours,



J. P. O'Hanlon
Senior Vice President - Nuclear

Attachments

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

Commissioner
Department of Health
Room 400
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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 J. P. O'Hanlon, who is Vice President - Nuclear Operations, 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 9TH day of June, 1994.
My Commission Expires: May 31, 1998.

Vicki L. Hull
Notary Public

(SEAL)

Attachment 1

Discussion of Changes

DISCUSSION OF CHANGES

RELOCATION OF INSTRUMENT RESPONSE TIME LIMITS NORTH ANNA POWER STATION UNITS 1 AND 2

Introduction

On December 29, 1993, the NRC issued Generic Letter 93-08 titled "Relocation of Technical Specification Tables of Instrument Response Time Limits." This generic letter provides guidance for preparing a proposed license amendment to relocate the tables of response time limits for the Reactor Trip System (RTS) and the Engineered Safety Features Actuation System (ESFAS) instruments from Technical Specifications to station controlled documents. Consistent with the guidance of Generic Letter 93-08, we are requesting license amendments for North Anna Unit 1 and Unit 2 to relocate the RTS and ESFAS tables of instrument response time limits from Technical Specifications to station controlled documents.

Background

The Reactor Trip System and the Engineered Safety Features Actuation System provides the signals needed to actuate the safety equipment necessary to mitigate accidents and transients. The measurement of response times of these instruments provides assurance that the action functions associated with each channel is completed within the time limit assumed in the accident analyses.

On December 29, 1993, the NRC issued Generic Letter 93-08 which provides guidance for relocating the RTS and ESFAS instrument response time limit tables to station controlled documents as a line-item Technical Specification improvement. Relocating these tables to station controlled documents is advantageous to both the NRC and Virginia Electric and Power Company in that changes to these tables can be controlled in accordance with the provisions of 10 CFR 50.59 and the administrative controls for procedure changes as established in Technical Specifications Section 6.8 "Procedures and Programs" without the need to process a license amendment request.

Relocating the RTS and ESFAS instrument response time limit tables to station controlled documents will not affect the safety function in that the operability and surveillance requirements for these instruments specified in Technical Specifications will not change. A Technical Specification surveillance review for RTS and ESFAS instruments was completed in August, 1993. This review verified that all surveillance requirements are satisfied by current plant procedures.

Specific Changes

These Technical Specification changes apply to both Unit 1 and Unit 2.

- Technical Specification 3.3.1.1, Limiting Condition for Operation. Delete "with RESPONSE TIMES as shown in Table 3.3-2."
- Surveillance Requirement 4.3.1.1.3. After the first sentence, add the following as required by Generic Letter 93-08: "Neutron detectors are exempt from response time testing. Response of the neutron flux signal portion of the channel time shall be measured from the detector output or input of the first electronic component in the channel." Correct typographical error by changing "Table 3.3.1" to "Table 3.3-1" on the last sentence.
- Delete pages 3/4 3-10 and 3/4 3-11.
- Technical Specification 3.3.2.1, Limiting Condition for Operation. Delete "and with RESPONSE TIMES as shown in Table 3.3-5."
- On Unit 1 delete pages 3/4 3-27 through 3/4 3-30.
- On Unit 2 delete pages 3/4 3-29 through 3/4 3-32.

The response time limits specified in the Technical Specifications are implemented by plant procedures and upon approval of amendments they will be incorporated into the next revision of the North Anna Power Station Technical Requirements Manual (NAPSTRM).

The North Anna Power Station Technical Requirements Manual (NAPSTRM)

Although the generic letter describes relocating the affected tables to the UFSAR, it is alternately proposed to relocate them to a separate station controlled document, the North Anna Power Station Technical Requirements Manual (NAPSTRM). The NAPSTRM was developed as part of North Anna Power Station's effort to consolidate the references that are used by station support and operations personnel in determining compliance with the various requirements that govern the safe operation of the station. Many of these requirements were formerly contained in Technical Specifications and, over the past several years, have been authorized for removal from Technical Specifications by the NRC through various license amendments. In the past these requirements were relocated to the Updated Final Safety Analysis Report (UFSAR) or various plant administrative procedures. This previous relocation effort has proven to be inefficient in that numerous documents must be referenced by station support and operations personnel to determine the various requirements. This research process is time consuming and requires local storage facilities for numerous documents.

The NAPSTRM was developed in response to this concern. The initial development and implementation of the NAPSTRM has been well received by station personnel. The NAPSTRM, when fully developed, along with the Technical Specifications, will provide an easy reference for plant support and operations personnel to use in order to make technically accurate decisions concerning the various requirements that govern the safe operation of the station.

Changes to the NAPSTRM, including the addition or relocation of technical requirements, are in accordance with the provisions of Section 6.8 "Procedures and Programs" of the Administrative Controls section of Technical Specifications. In addition, all changes, additions, or relocation of technical requirements must satisfy the criteria established in 10 CFR 50.59 "Changes, Tests, and Experiments." Subsequent changes to these limits in the NAPSTRM will be submitted to the NRC as part of the annual report required by 10 CFR 50.59 (b)(2). This report provides a summary description of the facility changes, tests and experiments including a summary of the safety evaluations that were conducted during the past year.

Safety Significance

The proposed changes to the RTS and ESFAS Technical Specifications are consistent with the intent of Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993. The proposed change will relocate the RTS and ESFAS response time limit tables to station controlled documents.

Relocating the RTS and ESFAS response time limit tables to station controlled documents does not affect the probability of occurrence or the consequences of the accidents in the UFSAR. The surveillance and technical requirements of the RTS and ESFAS instrument response times will not be affected. Therefore, the consequences of a postulated accident are not increased by this proposed change.

Relocating the RTS and ESFAS response time limit tables to station controlled documents will not increase the probability of a malfunction of the RTS or ESFAS instrumentation. Therefore, there is no effect on the ability of this instrumentation to perform its intended safety function. This relocation of the RTS and ESFAS response time limit tables to station controlled documents has been examined and accepted by the NRC staff in Generic Letter 93-08.

Relocating the RTS and ESFAS response time limit tables to station controlled documents does not affect plant or RTS and ESFAS instrument operations. Therefore, no new accident precursors are being generated by these proposed changes.

The Technical Specifications operability requirements for the RTS and ESFAS instruments are not being changed. The surveillance testing requirements and response time limits are adequate to ensure that the RTS and ESFAS instruments will be capable of performing their intended safety function. Therefore, the relocation of the RTS and ESFAS instrument response time limits to station controlled documents does not reduce the margin of safety as described in the Technical Specifications.