Attachment 2

Proposed Technical Specifications

3/4,3 INSTRUMENTATION

3/4.3.1 REACTOR TRIP SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.1.1 As a minimum, the reactor trip system instrumentation channels and interlocks of Table 3.3-1 shall be OPERABLE.

APPLICABILITY: As shown in Table 3.3-1.

ACTION:

As shown in Table 3.3-1.

- 4.3.1.1.1 Each reactor trip system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations for the MODES and at the frequencies shown in Table 4.3-1.
- 4.3.1.1.2 The logic for the interlocks shall be demonstrated OPERABLE prior to each reactor startup unless performed during the preceeding 92 days. The total interlock function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by interlock operation.
- 4.3.1.1.3 The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit at least once per 18 months. 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. Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1.

PAGES 3/4 3-10 AND 3/4 3-11 ARE DELETED (The next Page is 3/4 3-12)

INSTRUMENTATION

3/4.3.2 ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.2.1 The Engineered Safety Feature Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-4.

APPLICABILITY: As shown in Table 3.3-3.

ACTION:

- a. With an ESFAS instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3-4, declare the channel inoperable and apply the applicable ACTION requirement of Table 3.3-3 until the channel is restored to OPERABLE status with the trip setpoint adjusted consistent with the Trip Setpoint value.
- With an ESFAS instrumentation channel inoperable, take the ACTION shown in Table 3.3-3.

- 4.3.2.1.1 Each ESFAS instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST and SLAVE RELAY TEST operations for the MODES and at the frequencies shown in Table 4.3-2.
- 4.3.2.1.2 The logic for the interlocks shall be demonstrated OPERABLE during the automatic actuation logic test. The total interlock function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by interlock operation.
- 4.3.2.1.3 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3.

PAGES 3/4 3-27 THRU 3/4 3-30 ARE DELETED
(The next Page is 3/4 3-31)

3/4.3 INSTRUMENTATION

3/4.3.1 REACTOR TRIP SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.1.1 As a minimum, the reactor trip system instrumentation channels and interlocks of Table 3.3-1 shall be OPERABLE.

APPLICABILITY: As shown in Table 3.3-1.

ACTION:

As shown in Table 3.3-1.

- 4.3.1.1.1 Each reactor trip system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations for the MODES and at the frequencies shown in Table 4.3-1.
- 4.3.1.1.2 The logic for the interlocks shall be demonstrated OPERABLE prior to each reactor startup unless performed during the preceeding 92 days. The total interlock function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by interlock operation.
- 4.3.1.1.3 The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit at least once per 18 months. 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. Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1.

PAGES 3/4 3-10 AND 3/4 3-11 ARE DELETED (The next Page is 3/4 3-12)

3/4 3-10

INSTRUMENTATION

3/4.3.2 ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.2.1 The Engineered Safety Feature Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-4.

APPLICABILITY: As shown in Table 3.3-3.

ACTION:

- a. With an ESFAS instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3-4, declare the channel inoperable and apply the applicable ACTION requirement of Table 3.3-3 until the channel is restored to OPERABLE status with the trip setpoint adjusted consistent with the Trip Setpoint value.
- With an ESFAS instrumentation channel inoperable, take the ACTION shown in Table 3.3-3.

- 4.3.2.1.1 Each ESFAS instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST and SLAVE RELAY TEST operations for the MODES and at the frequencies shown in Table 4.3-2.
- 4.3.2.1.2 The logic for the interlocks shall be demonstrated OPERABLE during the automatic actuation logic test. The total interlock function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by interlock operation.
- 4.3.2.1.3 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3.

PAGES 3/4 3-29 THRU 3/4 3-32 ARE DELETED
(The next Page is 3/4 3-33)

Attachment 3

Significant Hazards Consideration

SIGNIFICANT HAZARDS CONSIDERATION

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

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.

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. Consistent with 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.

Virginia Electric and Power Company has reviewed the proposed 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 North Anna Power Station in accordance with the proposed Technical Specification changes will not:

 Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated.

The Reactor Trip System and the Engineered Safety Features Actuation System provide the signals needed to actuate the safety equipment necessary to mitigate accidents and transients. The proposed changes relocate the RTS and ESFAS instrument response time limits from the Technical Specifications to station controlled documents but will not change the operability or surveillance requirements for these instruments. With these proposed changes, revisions to the response times for these instruments can be made pursuant to 10 CFR 50.59 without Nuclear Regulatory Commission approval unless the revision involves an unreviewed safety question.

The proposed changes will not change any accident initiators or the consequences of any analyzed accident. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously analyzed.

Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes relocate the RTS and ESFAS instrument response time limits from the Technical Specifications to station controlled documents but will not change the functions of these instruments. The proposed change does not represent a change in the configuration or operation of the plant. No new hardware is being added to the plant as part of the proposed changes. The Technical Specifications will continue to require the same operability and surveillance requirements to be met for these instruments. Therefore, the proposed changes do not create the possibility of a new or different type of accident from any accident previously evaluated.

Involve a significant reduction in a margin of safety.

The proposed changes will not affect the functions of the RTS or the ESFAS instruments. Relocating the response time limits will not alter the operability or the surveillance requirements of these instruments. The administrative change control provisions for plant procedures written pursuant to 10 CFR 50.59 are adequate to control revisions to the response time limits. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.