at least 60 days prior to cycle initial criticality unless otherwise approved by the Commission by letter. In addition, in the event that the limit should change requiring a new submittal or an amended submittal to the Core Surveillance Report, it will be submitted 60 days prior to the date the limit would become effective unless otherwise approved by the Commission by letter.

Any additional information needed to support the F_{xy}^{RTP} and

P submittal will be by request from the NRC and need not be included in this report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.8 Routine Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following initial criticality.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison (as appropriate) with preoperational studies, operational controls, and previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 3.12.2.

The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the Table and Figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 3.12.3; discussion of all deviations from the sampling schedule of Table 4.12-1 and discussion of all analyses in which the LLD required by Table 4.12-3 was not achievable.

*A single submittal may be made for a multiple unit station.

- **One map shall cover stations near the SITE BOUNDARY; a second shall include the more distant stations.
- +This change was previously submitted in Vepco letter dated March 16, 1984 (Serial No. 136).

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ATTACHMENT 2

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CORE SURVEILLANCE REPORT

6.9.1.7 The F limit for Rated Thermal Power (F xy planes containing Bank "D" control rods and in all unrodded core planes, the surveillance power level, P, for Technical Specifications 3.2.1 and 3.2.6, and the F flyspeck basis as determined using the definitions and methodology in WCAP 8385 and Westinghouse letter to NRC dated April 6, 1978 Serial No. NS-CE-1749 shall be provided to the Regional Administrator, Region II, with a copy to;

Director, Office of Nuclear Reactor Regulation Attention: Chief, Core Performance Branch U. S. Nuclear Regulatory Commission Washington, D. C. 20555

at least 60 days prior to cycle initial criticality unless otherwise approved by the Commission by letter. In addition, in the event that the limit should change requiring a new submittal or an amended submittal to the Core Surveillance Report, it will be submitted 60 days prior to the date the limit would become effective unless otherwise approved by the Commission by letter.

⁺These changes were previously submitted in Vepco letter dated March 16, 1984 (Serial No. 136).

ATTACHMENT 3

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATIONS CHANGE

Presently, the Core Surveillance Report must be submitted to the NRC 60 days prior to initial criticality of the reload cycle. This proposed revision would permit a reduction of the time before criticality that the report must be submitted if the reduction has been approved by the NRC by letter. This reduction in submittal time will allow more flexibility in scheduling core design tasks and refueling outage planning. These proposed changes remain consistent with NUREG-0452, Revision 4, Standard Technical Specifications for Westinghouse PWR's, dated Fall, 1981.

This change will not affect the validity of information and conclusions contained in the Core Surveillance Report, nor will it affect the need for frequent axial power distribution surveillance. The proposed modification will not adversely affect the safe operation of the plant. The probability of occurrence, or the consequences of an accident or malfunction of equipment important to safety, previously evaluated in the safety analysis report is not increased, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created, and the margin to safety as defined in the Technical Specification basis is not reduced. These changes do not involve a significant hazards consideration as described in the Federal Register dated April 6, 1983, Page 14870, Example (vii); a change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly keeping with the regulations. The proposed changes remain consistent with NUREG-0452, Revision 4.