

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 1, 1992

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

Serial No.: 92-268
NL&P/JYR
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 SPECIFICATION CHANGES

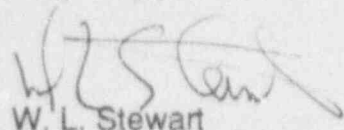
Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications, to Operating License Numbers NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively. The proposed change will revise the current Technical Specifications for service water to permit progression through modes once the design basis has been met.

A discussion of the proposed change is provided in Attachment 1. The proposed changes are presented in Attachments 2 and 3 for Units 1 and 2, respectively.

This request has been reviewed by the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee. It has been determined that this request does 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 no significant hazards consideration is involved is presented in Attachment 4.

Should you have any questions or require additional information, please contact us at your earliest convenience.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

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Attachments

1. Discussion of Proposed Changes
2. Proposed Technical Specification Change for North Anna Unit 1
3. Proposed Technical Specification Change for North Anna Unit 2
4. 10 CFR 50.92 Evaluation

cc. U.S. Nuclear Regulatory Commission
Region II
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Suite 2900
Atlanta, GA 30323

Mr. M. S. Lesser
NRC Senior Resident Inspector
North Anna Power Station

Commissioner
Department of Health
Room 400
109 Governor Street
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 W. L. Stewan who is Senior Vice President - Nuclear, 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 1ST day of May, 1992.

My Commission Expires: May 31, 1994.

Picki L. Hull
Notary Public

(SEAL)

Attachment 1

**Discussion of Proposed Changes
North Anna Units 1 and 2**

Virginia Electric and Power Company

DISCUSSION OF PROPOSED CHANGES

Introduction

The proposed change described herein is being made to Technical Specification 3.7.4.1.a, "Service Water System - Operating." The current Technical Specification action statement permits operation with one service water pump inoperable if component cooling heat exchanger service water flows are throttled. This action ensures the remaining service water pumps will deliver design basis flows to the recirculation spray heat exchangers. Since design basis flows are met upon completion of throttling the component cooling heat exchanger service water flows, progression through modes would not be outside the design basis. However, Specification 3.0.4 does not permit mode changes once an action statement is entered. The proposed change will allow progression through modes once throttling of component cooling heat exchanger service water flows has been accomplished by stating that Specification 3.0.4 is not applicable.

Background

License Amendment Nos. 152 and 136 for North Anna Units 1 and 2, respectively, were issued on December 13, 1991 for the service water system to ensure that the design basis for the system is met. Action Statement 3.7.4.1.a in these amendments allows continued operation for an unlimited time period provided throttling of component cooling heat exchanger service water flows, to ensure design basis flows to the recirculation spray heat exchangers, is completed. Currently, mode changes are not permitted under Specification 3.0.4 even through the design basis is met.

Generic Letter (GL) 89-07, "Sections 3.0 and 4.0 of the Standard Technical Specifications on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," was issued to address Technical Specification improvements. One issue addressed by the generic letter involved the unnecessary restrictions on mode changes by Specification 3.0.4. The NRC acknowledges, in GL 89-07, that Specification 3.0.4 unduly restricts operation when conformance to the action statement provides an acceptable level of safety for continued operation. The generic letter states the following:

For an LCO that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operational mode or other specified condition of operation should be permitted in accordance with the requirements for an LCO. The restriction on a change in operational modes or other specified conditions should apply only where the Action Requirements establish a specified time interval in which the LCO must be met or a shutdown of the facility would be required.

Therefore, making Specification 3.0.4 not applicable in Action Statement 3.7.4.1.a would be consistent with the stated NRC position.

Technical Specification Changes

General

All Technical Specification changes described herein apply to North Anna Units 1 and 2.

Technical Specification 3.7.4.1

The proposed change would permit mode changes while in Action Statement 3.7.4.1.a by stating that Specification 3.0.4 is not applicable once service water flows to the component cooling heat exchangers are throttled.

Action Statement 3.7.4.1.a requires component cooling heat exchanger service water flows to be throttled, within 72 hours, if one of the four required normal service water pumps becomes inoperable. This action ensures that the normal service water pumps remain capable of providing design basis flows to the recirculation spray heat exchangers and allows design basis flows to be delivered by two normal service water pumps with the failure of the third operable normal service water pump. The unit can remain in this action statement for an indefinite period of time. Other action statements within this Technical Specification address multiple failures.

The proposed change would also allow operational flexibility to perform periodic maintenance on a service water pump or its associated normal or emergency power supply. During this period of time, the requirements of Action Statement 3.7.4.1.a would be complied with without unduly restricting mode changes.