

Attachment 2

Proposed Technical Specification Change
North Anna Units 1 and 2

Virginia Electric and Power Company

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TABLE 4.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
13. Loss of Flow - Two Loops	S	R	NA	1
14. Steam Generator Water Level - Low-Low	S	R	M	1, 2
15. Steam/Feedwater Flow Mismatch and Low Steam Generator Water Level	S	R	M	1, 2
16. Undervoltage - Reactor Coolant Pump Busses	NA	R	NA	1
17. Underfrequency - Reactor Coolant Pump Busses	NA	R	NA	1
18. Turbine Trip				
A. Low Auto Stop Oil Pressure	NA	NA	S/U(1)	1, 2
B. Turbine Stop Valve Closure	NA	NA	S/U(1)	1, 2
19. Safety Injection Input from ESF	NA	NA	M(4) & (5)	1, 2
20. Reactor Coolant Pump Breaker Position Trip	NA	NA	R	NA
21. A. Reactor Trip Breaker	NA	NA	M(5), (8), & (10)	1, 2, & *
B. Reactor Trip Bypass Breaker	NA	NA	M(5), (8), & R(9)	1, 2, & *
22. Automatic Trip Logic	NA	NA	M(5)	1, 2, & *

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TABLE 3.3-3 (Continued)

- ACTION 17 - With the number of OPERABLE channels one less than the Total Number of Channels operation may proceed provided the inoperable channel is placed in the tripped condition within 1 hour and the Minimum Channels OPERABLE requirement is met. One additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 18 - With the number of OPERABLE Channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in at least COLD SHUTDOWN within the following 30 hours.
- ACTION 19 - With the number of OPERABLE Channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the following conditions are satisfied:
- a. The inoperable channel is placed in the tripped condition within 1 hour.
 - b. The Minimum Channels OPERABLE requirement is met; however, one additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 20 - With the number of OPERABLE Channels one less than the Total Number of Channels, be in at least HOT STANDBY within 6 hours and at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1 provided the other Channel is OPERABLE.
- ACTION 21 - With the number of OPERABLE Channels one less than the Total Number of Channels, restore the inoperable Channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in at least HOT SHUTDOWN within the following 6 hours.

TABLE 4.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
13. Loss of Flow - Two Loops	S	R	N.A.	1
14. Steam Generator Water Level - Low-Low	S	R	M	1, 2
15. Steam/Feedwater Flow Mismatch and Low Steam Generator Water Level	S	R	M	1, 2
16. Undervoltage - Reactor Coolant Pump Busses	N.A.	R	M	1
17. Underfrequency - Reactor Coolant Pump Busses	N.A.	R	M	1
18. Turbine Trip				
A. Low Auto Stop Oil Pressure	N.A.	N.A.	S/U(1)	N.A.
B. Turbine Stop Valve Closure	N.A.	N.A.	S/U(1)	N.A.
19. Safety Injection Input from ESF	N.A.	N.A.	M(4) & (5)	1, 2
20. Reactor Coolant Pump Breaker Position Trip	N.A.	N.A.	R	1
21. A. Reactor Trip Breaker	N.A.	N.A.	M(5), (9), & (11)	1, 2, & *
B. Reactor Trip Bypass Breaker	N.A.	N.A.	M(5), (9), & R(10)	1, 2, & *
22. Automatic Trip Logic	N.A.	N.A.	M(5)	1, 2, & *

NORTH ANNA - UNIT 2

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Amendment No.

TABLE 3.3-3 (Continued)

- ACTION 17 – With the number of OPERABLE channels one less than the Total Number of Channels operation may proceed provided the inoperable channel is placed in the tripped condition within 1 hour and the Minimum Channels OPERABLE requirement is met. One additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 18 – With the number of OPERABLE Channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- ACTION 19 – With the number of OPERABLE Channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the following conditions are satisfied:
- a. The inoperable channel is placed in the tripped condition within 1 hour.
 - b. The Minimum Channels OPERABLE requirement is met; however, one additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 20 – With the number of OPERABLE Channels one less than the Total Number of Channels, be in at least HOT STANDBY within 6 hours, and at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1 provided the other Channel is OPERABLE.
- ACTION 21 – With the number of OPERABLE Channels one less than the Total Number of Channels, restore the inoperable Channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in at least HOT SHUTDOWN within the following 6 hours.

Attachment 3

10 CFR 50.92, Significant Hazards Consideration
North Anna Units 1 and 2

Virginia Electric and Power Company

10 CFR 50.92, Significant Hazards Consideration

Technical Specification 3.3.1.1 requires that the Reactor Trip System Instrumentation Channels and Interlocks of Table 3.3-1 shall be operable with response times as shown in Table 3.3-2. Technical Specification 3.3.2.1 requires that the Engineered Safety Feature Actuation System (ESFAS) instrumentation channels 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 and with response times as shown in Table 3.3-5.

The proposed changes revise Technical Specification 4.3.1.1.1, Reactor Trip System Instrumentation, Table 4.3-1, Item 19, Safety Injection Input from ESF, to increase the surveillance interval from every month to every 62 days on a staggered test basis and Technical Specification 3.3.2.1, Table 3.3-3, Action 20, to allow a channel to be bypassed for up to two hours for testing purposes. The proposed changes also make administrative changes that do not affect the technical content of the specifications.

It has been determined that the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92. This determination was based on the following points.

1. **The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.** The proposed changes revise Technical Specification 4.3.1.1.1 such that the amount of time each train of Reactor Trip System Instrumentation is inoperable for testing is decreased and Technical Specification 3.3.2.1 such that sufficient time is allowed for testing the ESFAS logic without having to enter a shutdown action statement. These changes to Reactor Trip System and ESFAS instrumentation testing have no significant effect on the probability of an accident because the time spent testing is not significantly increased and because it only affects one train at a time.

Likewise, the consequences of the accidents previously evaluated will not increase as a result of the proposed Technical Specification changes. Testing the Safety Injection input from ESF function on a staggered test basis increases the operability time for the two trains of Reactor Trip System instrumentation. The consequences of allowing up to an additional hour to test each train of ESFAS logic are not significantly increased because the time spent testing is not significantly increased and the opposite train is still available to perform its design function. The proposed changes are consistent with other testing requirements and are at least as stringent as the requirements of NUREG 0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors, Revision 4.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.** The changes proposed herein do not involve any changes to plant design nor methods of operation. The proposed changes do not involve operation of any plant equipment in a different manner from which it was designed to operate. Since a new failure mode is not created, a new or different type of accident is not made possible.
3. **The proposed changes do not involve a significant reduction in a margin of safety.** The proposed operational configuration does not involve changes to safety limits or limiting safety system settings. Setpoints and operating parameters are not affected. Safety margins are, therefore, not reduced.

Virginia Electric and Power Company concludes that the activities associated with these proposed Technical Specification changes satisfy the no significant hazards consideration standards of 10 CFR 50.92 (c) and, accordingly, a no significant hazards consideration finding is justified.