

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 8, 1992

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

Serial No. 92-368
NAPS/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

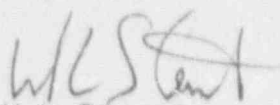
Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications, to Operating License Numbers NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively. The proposed change will revise the time frames in Technical Specification 3.0.5 for conducting a shutdown in a controlled and orderly manner to be consistent with the time frames in Technical Specification 3.0.3.

A discussion of the proposed changes is provided in Attachment 1. The proposed changes are presented in Attachment 2 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 3.

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 Units 1 and 2
3. 10 CFR 50.92, Significant Hazards Consideration

cc: U.S. Nuclear Regulatory Commission
Region II
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Mr. M. S. Lesser
NRC Senior Resident Inspector
North Anna Power Station

Commissioner
Department of Health
Room 400
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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. Stewart 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 8TH day of June, 1992.

My Commission Expires: May 31, 1994.

Picki L. Hulse
Notary Public

(SEAL)

Attachment 1

Discussion of Proposed Changes

North Anna Units 1 and 2

Virginia Electric and Power Company

DISCUSSION OF PROPOSED CHANGE

Introduction

The proposed change revises Technical Specification 3.0.5 completion times to permit a shutdown to proceed in a controlled and orderly manner that is within the maximum cooldown rate and within the cooldown capabilities of the unit assuming only the minimum required equipment is operable.

Technical Specification 3.0.5 delineates additional conditions that must be satisfied to permit operation to continue when a normal or emergency power source is not operable. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable, and a system, subsystem, train, component, or device in another division are inoperable for another reason.

Background

An NRC letter to All Power Reactor Licensees, dated April 10, 1980, requested licensees to submit proposed Technical Specifications 3.0.3 and 3.0.5. The NRC letter contained model Technical Specifications. Model Technical Specifications 3.0.3 and 3.0.5 were formulated to ensure that no set of equipment outages would be allowed to persist that would result in the facility being in an unprotected condition. The model Technical Specifications 3.0.3 and 3.0.5 contained the same time frames to reach hot standby, hot shutdown, and cold shutdown.

License amendment number 19 for Unit 1 and the original operating license for Unit 2 issued Technical Specifications 3.0.3 and 3.0.5 consistent with the April 10, 1980, NRC letter. However, Technical Specification 3.0.3 was revised in license amendment numbers 62 and 46 for Units 1 and 2, respectively. License amendment numbers 62 and 46 allowed one hour to initiate actions and changed the time frames to reach hot standby, hot shutdown, and cold shutdown for Technical Specification 3.0.3. These license amendments were consistent with NUREG-0452, Revision 4, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." However, NUREG-0452 does not include Technical Specification 3.0.5. As a result, we did not evaluate or request a change to Technical Specification 3.0.5 at that time.

As a result of issuance of license amendment numbers 62 and 46, the time frames for Technical Specifications 3.0.3 and 3.0.5 became inconsistent. The changes proposed herein correct this inconsistency and meet the intent of the April 10, 1980, NRC letter, while still maintaining consistency with NUREG-0452.

Technical Specification Change

General

The technical specification change described herein applies to North Anna Units 1 and 2.

The provisions of Technical Specification 3.0.5 permit the action statements associated with individual systems, subsystems, trains, components, or devices to be consistent with the action statements of the associated electrical power source. It allows operation to be governed by the time limits of the action statement associated with the Technical Specification for the normal or emergency power source, not the individual action statements for each system, subsystem, train, component, or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

For example, Technical Specification 3.8.1.1 requires that two emergency diesel generators be operable. The action statement provides for a 72 hour outage time when one emergency diesel generator is not operable. If the definition of operable was applied without consideration of Technical Specification 3.0.5, all systems, subsystems, trains, components, and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable action statement. However, the provisions of Technical Specification 3.0.5 permit continued operation consistent with the action statement for the inoperable emergency diesel generator, provided the other specified conditions are satisfied. In this case, the corresponding normal power source must be operable, and all redundant systems, subsystems, trains, components, and devices must be operable, or otherwise satisfy Technical Specification 3.0.5 (i.e., remain capable of performing their design function and have at least one normal or emergency power source operable). If the conditions are not satisfied, action is required in accordance with Technical Specification 3.0.5.

Technical Specification 3.0.5 currently states the following:

"When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this Specification. Unless both conditions (1) and (2) are satisfied, the unit shall be placed in at least HOT STANDBY within 1 hour, in at least HOT SHUTDOWN within the next 6 hours, and in at least COLD SHUTDOWN within the following 30 hours. This Specification is not applicable in MODES 5 or 6."

This requires that the unit be placed in hot standby within 1 hour, in hot shutdown within the next 6 hours, and in cold shutdown within the following 30 hours if the conditions stated in the Technical Specification are not met.

Technical Specification 3.0.5 is not applicable in modes 5 or 6. Therefore, the individual action statements for each applicable Technical Specification must be adhered to when in these modes.

Technical Specification 3.0.5

The proposed change will modify Technical Specification 3.0.5 such that it includes the following actions if the conditions stated in the applicable Technical Specification are not met:

"...within one hour ACTION shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in:

1. At least HOT STANDBY within 6 hours,
2. At least HOT SHUTDOWN within the next 6 hours, and
3. At least COLD SHUTDOWN within the following 24 hours.

Exceptions to these requirements are stated in the individual Specifications."

Therefore, the revised Technical Specification 3.0.5 will read as follows:

"When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided:

1. Its corresponding normal or emergency power source is OPERABLE, and
2. All of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this Specification.

Unless both conditions 1. and 2. above are satisfied, within one hour ACTION shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in:

1. At least HOT STANDBY within 6 hours,
2. At least HOT SHUTDOWN within the next 6 hours, and
3. At least COLD SHUTDOWN within the following 24 hours.

Exceptions to these requirements are stated in the individual Specifications. This Specification is not applicable in Modes 5 or 6."

Format changes have been incorporated in the proposed change strictly for editorial purposes.

The purpose of the revised section of Technical Specification 3.0.5 is to delineate the time limits for placing the unit in a safe shutdown mode. One hour is permitted under the proposed change to prepare for an orderly shutdown before initiating a change in plant operations. This time permits the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid.

The completion times specified to reach lower modes of operation permit a shutdown to proceed in a controlled and orderly manner that is within the maximum cooldown rate and within the shutdown capabilities of the unit assuming only the minimum required equipment is operable. This reduces thermal stresses on components of the primary coolant system and the potential for a plant upset that could challenge safety systems under conditions for which these time limits would apply.

The completion times proposed above to reach hot standby, hot shutdown, and cold shutdown for Technical Specification 3.0.5 are consistent with the completion times currently established in Technical Specification 3.0.3.