Attachment 2

Completed Version of Proposed Changes

North Anna Units 1 and 2

Virginia Electric and Power Company

## 3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

### 3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each Specification.

3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the Specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, 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.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications. This specification is not applicable in MODES 5 or 6.

3.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements.

3.0.5 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.

## 3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

### 3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, 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.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications. This specification is not applicable in MODES 5 or 6.

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications.

3.0.5 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.

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

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.

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. Both 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 later 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 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 request a change to Technical Specification 3.0.5 at that time.

Issuance of license amendment numbers 62 and 46, the time frames for Specifications 3.0.3 and 3.0.5 became inconsistent. The changes proposed restore consistency and meet the intent of the April 10, 1980 NRC letter, consistency with NUREG-0452.

Specification 3.0.5 requires that the unit be placed in hot standby shutdown within the following 6 hours, and in cold shutdown the conditions stated in the Technical Specification are

Technical Specification 3.0.5 such that it includes stated in the applicable Technical Specification

## 10 CFR 50.92, Significant Hazards Consideration

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.

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. Both 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 later 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.

Currently, Technical Specification 3.0.5 requires that the unit be placed in hot standby within 1 hour, in hot shutdown within the following 6 hours, and in cold shutdown within the following 30 hours if the conditions stated in the Technical Specification are not met.

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 above stated 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 the 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.

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

1. **The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.** 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. The proposed change has no significant impact on the probability of an accident due to the fact that the total time to reach cold shutdown remains the same.

   Likewise, the consequences of any accident previously evaluated will not increase as a result of the proposed change. Previous evaluations have been based on the total time to reach cold shutdown, which remains the same. Finally, the proposed change will correct the inconsistency associated with completion times for Technical Specifications 3.0.3 and 3.0.5 and meet the intent of the April 10, 1980 NRC letter, while still maintaining consistency with NUREG-0452.

2. **The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.** The proposed change does not involve any change to plant design or methods of operation. The proposed change does not involve operation of any plant equipment in a manner different from which it was designed to operate. Since a new or different kind of failure is not created, the possibility of a new or different type of accident does not exist.

3. **The proposed change does not involve a significant reduction in a margin of safety.** The proposed change does not involve a change to safety limits or limiting safety system settings. Setpoints and operating parameters are not affected. Therefore, the margin of safety is not significantly reduced.

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