

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

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TABLE 4.4-3

REACTOR COOLANT SYSTEM

CHEMISTRY LIMITS SURVEILLANCE REQUIREMENTS

<u>PARAMETER</u>	<u>MINIMUM ANALYSIS FREQUENCIES</u>
DISSOLVED OXYGEN*	At least once per 72 hours
CHLORIDE**	At least once per 72 hours
FLUORIDE**	At least once per 72 hours

*Not required with T_{avg} less than or equal to 250°F

**Not required when the Reactor Coolant System is drained below the reactor pressure vessel nozzle and the internals and/or head are in place.

ATTACHMENT 2

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGE

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGE

The proposed Technical Specification change reflects a revision to Technical Specification 3/4.4.7, Table 4.4-3, for North Anna Unit 2, to delete the requirement for sampling chlorides and fluorides when the reactor coolant system is drained below the reactor pressure vessel nozzle and the internals and/or head are in place.

Currently, chlorides and fluorides in the reactor coolant system require surveillance at least once per 72 hours. To perform refueling and maintenance activities, the reactor coolant system is drained below the nozzle, the RHR system is drained and the upper internals are in place. To get the required chloride and fluoride samples for the 72 hour analysis frequency, it would mean that there will be radiation exposure involved because an individual would have to go into the upper internals area (which currently has a 10 R radiation field). Since the reactor coolant system and RHR system are drained, the inventory of chlorides and fluorides will not change. No makeup is planned to the reactor coolant system, and any makeup to the RCS could be detected.

Vepco will sample the chlorides and fluorides in the reactor coolant system prior to fully draining the system. Vepco will resume sampling the reactor coolant system for chlorides and fluorides when the reactor coolant system is refilled, so that the chloride and fluoride inventory will be known and the Technical Specification required surveillance will be followed.

The probability of occurrence or the consequences of a malfunction of equipment important to safety and previously evaluated in the FSAR is not increased because the chloride and fluoride inventory in the reactor coolant system will not change since the reactor coolant system and RHR System are drained and the inventory was known at the last sample.

The possibility of a different type of accident or malfunction than was previously evaluated in the FSAR has not been created because the sampling of chlorides and fluorides will resume when the reactor coolant system is refilled to show that the samples are below their required limits.

The margin of safety as described in the BASES section of any part of the Technical Specifications is not reduced because sampling of chlorides and fluorides will resume when the reactor coolant system is refilled and the chloride and fluoride inventory was within specifications at the time of drain down. Additional makeup could be detected.

It has been determined that this change does not pose a significant hazards consideration. Example iv of examples of amendments that are considered not likely to involve a significant hazards consideration states, "A relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. This assumes that the operating restriction and the criteria to be applied to a request for relief have been established in a prior review and that it is justified in a satisfactory way that the criteria have been met." The proposed change for Unit 2 was previously reviewed and approved by the NRC for Unit 1 as indicated in Amendment No. 41 to Facility Operating License NPF-4, dated August 4, 1982. The NRC's approval of the Unit 1 amendment indicated that the proposed change did not pose an unreviewed safety question or a significant hazards consideration.