VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

W. L. STEWART VICE PRESIDENT NUCLEAR OPERATIONS

February 14, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. James R. Miller, Chief
Operating Reactors Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Serial No. 523A E&C/NAS:cdk:2007N Docket Nos. 50-338 50-339 License Nos. NPF-4 NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY NORTH ANNA POWER STATION UNIT NOS. 1 AND 2 PROPOSED TECHNICAL SPECIFICATION CHANGES

Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests an amendment in the form of changes to the Technical Specifications to Operating Licenses NPF-4 and NPF-7, for North Anna Unit Nos. 1 and 2, respectively.

The proposed Technical Specifications changes will revise the nominal Intermediate Range neutron flux trip setpoint from a current equivalent to less than or equal to 25% of rated thermal power to a current less than or equal to 4×10^{-7} amperes. The Intermediate Range instrumentation has been shown historically to be sensitive to changes in core loading pattern, cycle burnup and control rod axial position. As such, the requirement that the associated flux trips be equivalent to a fixed power level has led to an inordinate amount of attention being paid by the operating staff to maintaining these channels in calibration. The revisions provide a more realistic and operationally sound method of specifying the setpoints.

The proposed Technical Specification changes for North Anna Unit Nos. 1 and 2 are provided in Attachments 1 and 2, respectively. A safety evaluation of the proposed change is provided in Attachment 3.

This request has been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Safety Evaluation and Control Staff. It has been determined that this request does not involve an unreviewed safety question as defined by 10 CFR 50.59.

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It has been further determined that these proposed changes do not pose a significant hazards consideration as defined in the Federal Register, dated April 6, 1983, Example (vi) which partially states, "A change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptance criteria with respect to the system or component specified in the Standard Review Plan". The proposed changes have been reviewed with respect to the accident analyses in the North Anna USFAR and none are affected. The UFSAR analyses are in accordance with the acceptance criteria of Standard Review Plan 7.2. Therefore these changes do not pose a significant hazards consideration.

This request supersedes the request previously submitted by our letter of October 15, 1984, Serial No. 523. At the time of our previous submittal we had reviewed the request in accordance with the criteria in 10 CFR 170.12, and remitted an application fee of \$150; therefore no additional fee is required.

Very truly yours,

W Stewart

Attachments

- Proposed Technical Specifications Changes Unit 1
- Proposed Technical Specifications Changes Unit 2
- 3. Safety Evaluation

cc: Mr. James P. O'Reilly Regional Administrator Region II

> Mr. M. W. Branch NRC Resident Inspector North Anna Power Station

Mr. Charles Price Department of Health 109 Governor Street Richmond, Virginia 23219 COMMONWEALTH OF VIRGINIA)
CITY OF RICHMOND)

The foregoing document was acknowledged before me, in and for the City and Commonwealth aforesaid, today by W. L. Stewart who is Vice President - Nuclear Operations, of the 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 14th day of Jehrung, 19 85.

My Commission expires: 2-26, 19 85.

Ann C. Marzee Notary Public

(SEAL)

ATTACHMENT 1

Technical Specification Changes - Unit 1