ATTACHMENT 2
PROPOSED TECHNICAL SPECIFICATION CHANGE UNIT 1

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

(i) Training of personnel,

(ii) Procedures for monitoring, and

(iii) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

(i) Identification of a sampling schedule for the critical variables and control points for these variables,

(ii) Identification of the procedures used to measure the values of the critical variables,

(iii) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser inleakage,

(iv) Procedures for the recording and management of data,

(v) Procedures defining corrective actions for all control point chemistry conditions, and

(vi) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Post-Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

(i) Training of personnel,

(ii) Procedures for sampling and analysis,

(iii) Provisions for maintenance of sampling and analysis equipment.

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION CHANGE UNIT 2

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

(i) Training of personnel,

(ii) Procedures for monitoring, and

(iii) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

(i) Identification of a sampling schedule for the critical variables and control points for these variables,

(ii) Identification of the procedures used to measure the values of the critical variables,

(iii) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser inleakage,

(iv) Procedures for the recording and management of data,

(v) Procedures defining corrective actions for all control point chemistry conditions, and

(vi) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Post-Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

(i) Training of personnel,

(ii) Procedures for sampling and analysis,

(iii) Provisions for maintenance of sampling and analysis equipment.

ATTACHMENT 4
10 CFR 50.92 EVALUATION

SIGNIFICANT HAZARDS CONSIDERATION

The proposed changes delete Technical Specification 6.8.4.c(vii). In addition, Technical Specification 6.8.4.c(iii) is modified to reflect the deletion of Technical Specification 6.8.4.c(vii). Editorial changes are proposed to Technical Specifications 6.8.4.c(v) and 6.8.4.c(vi).

Technical Specification 6.8.4.c specifies a program for monitoring secondary water chemistry to inhibit steam generator tube degradation. Specifically, Technical Specification 6.8.4.c(vii) requires monitoring the condensate at the discharge of the condensate pumps for evidence of condenser inleakage. In addition, Technical Specification 6.8.4.c(vii) requires a leak to be repaired, plugged, or isolated within ninety-six (96) hours after leakage confirmation.

The modification of Technical Specification 6.8.4.c(iii) will continue to require monitoring the condensate at the discharge of the condensate pumps for evidence of condenser inleakage. Repair of condenser inleakage will be conducted in accordance with station administrative procedures.

Technical Specification 6.8.4.c(vii) was a condition established for obtaining the full power license for North Anna Unit 2. Technical Specification 6.8.4.c(vii) was implemented in license amendment number 32 for North Anna Unit 1. The NRC's decision to establish monitoring and repair of condenser inleakage is discussed in NUREG 0053, Supplement 10, Safety Evaluation Report. NUREG 0053 states the following:

> "...we require monitoring of the steam condensate at the effluent of the condensate pump. When condenser leakage is confirmed the applicant will be required to repair or plug the leak in accordance with MTEB Branch Technical Position MTEB 5-3 attached to Standard Review Plan 5.4.2.1."

MTEB Branch Technical Position MTEB 5-3 describes the suggested secondary water chemistry program in order to maintain steam generator integrity. MTEB 5-3 is dated July 1981.

SGOG guidelines for secondary water chemistry, and EPRI secondary water chemistry guidelines were established in February 1985 and December 1988, respectively. These guidelines have been established as industry accepted standards and are more aggressive than the MTEB 5-3 position with regard to establishing actions for confirmation and repair of condenser inleakage.

The proposed changes will modify Technical Specification 6.8.4.c(iii) and delete Technical Specification 6.8.4.c(vii). Technical Specification 6.8.4.c(iii) and (vii) currently state the following:

> "c. Secondary Water Chemistry
>
> A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:
>
> ...

(iii) Identification of process sampling points,

...

(vii) Monitoring of the condensate at the discharge of the condensate pumps for evidence of condenser inleakage. When condenser inleakage is confirmed, the leak shall be repaired, plugged, or isolated within 96 hours."

The revised Technical Specification 6.8.4.c(iii) will read as follows:

"(iii) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser inleakage,"

The purpose of the revised Technical Specification 6.8.4.c(iii) is to incorporate the requirements that were in Technical Specification 6.8.4.c(vii) for monitoring of condenser inleakage. These changes [deletion of Technical Specification 6.8.4.c(vii), and modification of Technical Specification 6.8.4.c(iii)] are consistent with the SGOG and EPRI guidelines and will continue to ensure that the condensate at the discharge of the condensate pumps will be monitored in order to detect condenser inleakage.

The SGOG and EPRI guidelines have established appropriate action levels to be entered when a chemistry parameter is not maintained. For example, the normal value for condenser inleakage is less than four cubic feet per minute (cfm) inleakage. If condenser inleakage exceeds four cfm, action level one is entered into to promptly identify and correct the cause of the out of normal value without power reduction. The specific action required is to return condenser inleakage to within the normal value within one week. However, condenser inleakage outside normal values will cause other secondary water chemistry parameters to be outside their specified limits. Appropriate actions to maintain other secondary water chemistry parameters within specified limits may include such actions as reducing power or a plant shutdown.

North Anna has incorporated chemistry parameter action levels into station administrative procedures. These action levels ensure a more aggressive approach than MTEB 5-3 for condenser inleakage. This will replace, in part, Technical Specification 6.8.4.c(vii), that discussed the action time associated with confirmation of condenser inleakage. In addition, editorial changes are proposed to Technical Specifications 6.8.4.c(v) and 6.8.4.c(vi).

The proposed changes are consistent with the SGOG guidelines, EPRI guidelines, and NUREG - 0452, Revision 4, Standard Technical Specifications for Westinghouse Pressurized Water Reactors.

It has been determined that the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92. This determination is 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 are consistent with the SGOG guidelines, EPRI guidelines, and applicable sections of NUREG-0452 and will continue to ensure that the condensate at the discharge

of the condensate pumps will be monitored in order to detect condenser inleakage. In addition, station administrative procedures will ensure appropriate actions are taken in the event of condenser inleakage.

Likewise, the consequences of any accident previously evaluated will not increase as a result of the proposed change. The SGOG guidelines, EPRI guidelines and applicable sections of NUREG-0452 have been incorporated into station administrative procedures and ensure an aggressive approach for condenser inleakage by evaluating all chemistry parameters that may be affected. In addition, any applicable action levels for any chemistry parameter that may be associated with an increased condenser inleakage would also be entered.

2. **The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.** The proposed changes are consistent with SGOG guidelines, EPRI guidelines and applicable sections of NUREG-0452 that have established chemistry specifications to ensure secondary water chemistry is maintained at conditions to inhibit steam generator corrosion. The proposed changes are more conservative than the current requirements. 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 changes do not involve a significant reduction in a margin of safety.** The results of the UFSAR accident analyses continue to bound operation under the proposed changes. Actual plant operation will not be affected since the SGOG guidelines, EPRI guidelines and applicable sections of NUREG-0452 have been incorporated into station administrative procedures. The proposed changes do 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 the 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.