VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 9, 2021

10 CFR 50.90

U. S. Nuclear Regulatory Commission
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Docket Nos.: 50-338
50-339
License Nos.: NPF-4
NPF-7

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION ENERGY VIRGINIA)
NORTH ANNA POWER STATION UNITS 1 AND 2
APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-577, "REVISED FREQUENCIES FOR STEAM GENERATOR TUBE INSPECTIONS," REV 1, USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

Pursuant to 10 CFR 50.90, Dominion Energy Virginia is submitting a request for an amendment to the Technical Specifications (TS) for North Anna Power Station (NAPS), Units 1 and 2. Dominion Energy Virginia requests adoption of TSTF-577, Revision 1, "Revised Frequencies for Steam Generator Tube Inspections." The proposed changes revise TS 5.6.7, "Steam Generator (SG) Program," and TS 5.5.8, "Steam Generator Tube Inspection Report," based on operating history.

The Enclosure provides a description and assessment of the proposed changes. Attachment 1 contains the existing TS pages marked to show the proposed changes. Attachment 2 contains revised (clean) TS pages. The TS Bases are not affected by the proposed changes.

Dominion Energy Virginia requests that the amendment be reviewed under the Consolidated Line Item Improvement Process (CLIIP). Approval of the amendment is requested by September 1, 2022 to support steam generator tube inspection activities during the Unit 1 refueling outage (RFO) scheduled to begin in the fall of 2022. Once approved, the amendment shall be implemented within 30 days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Virginia Official.

Should you have any questions or require additional information, please contact Erica N. Combs at 804-273-3386.

Sincerely,

Mark D. Sartain
Vice President – Nuclear Engineering & Fleet Support

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mr. Mark D. Sartain, who is Vice President – Nuclear Engineering and Fleet Support, of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 9th day of September, 2021.

My Commission Expires: 12/31/24

Notary Public

CRAIG D SLY
Notary Public
Commonwealth of Virginia
Reg. # 7518653
My Commission Expires December 31, 2024

Enclosure: Description and Assessment of Proposed Change

Attachments:

1. Proposed Technical Specification Changes (Mark-Up)
2. Revised Technical Specification Pages

Commitments made by this letter:

An SG Tube Inspection Report will be submitted within 30 days after implementation of the approved license amendment.

cc: Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
Marquis One Tower
245 Peachtree Center Avenue, NE, Suite 1200
Atlanta, Georgia 30303-1257

Mr. G. E. Miller
Senior Project Manager – North Anna Power Station
U. S. Nuclear Regulatory Commission
Mail Stop 09 E-3
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

NRC Senior Resident Inspector
North Anna Power Station

Old Dominion Electric Cooperative
R-North-Anna-Correspondence@odec.com

State Health Commissioner
Virginia Department of Health
James Madison Building - 7th floor
109 Governor Street, Suite 730
Richmond, Virginia 23219

ENCLOSURE

Description and Assessment of Proposed Change

Virginia Electric and Power Company
(Dominion Energy Virginia)
North Anna Power Station Unit 1 and Unit 2

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company (Dominion Energy Virginia) proposes changes to the North Anna Power Station (NAPS) Units 1 and 2 Operating Licenses (OLs) and Technical Specifications (TS) to adopt TSTF-577, Rev. 1, "Revised Frequencies for Steam Generator Tube Inspections." The TS related to steam generator (SG) tube inspections and reporting are being revised based on operating history.

The proposed changes revise the TS related to SG tube inspection and reporting requirements in the Administrative Controls section of the TS. Specifically, the NAPS Units 1 and 2 TS are being revised to define a new, fixed SG tube inspection frequency of at least every 96 effective full power months (EFPMs) and to revise inspection period requirements. The new inspection period starts after a 100% inspection of all SG tubes has been performed during a single outage (past or future), which was completed for NAPS Units 1 and 2 during the spring 2018 and spring 2019 refueling outages (RFOs), respectively. The current TS requirement to perform an inspection after a crack is found within, "24 effective full power months or one refueling outage (whichever results in more frequent inspections)," is also being revised to require an inspection during the next RFO. Finally, the proposed change rearranges the existing reporting requirements in TS 5.6.7 for clarity.

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

Dominion Energy Virginia has reviewed the safety evaluation for TSTF-577, Rev. 1, provided to the Technical Specifications Task Force in a letter dated April 14, 2021 (ADAMS Accession No. ML21098A188). This review included the NRC staff's evaluation and the information provided in TSTF-577, Rev. 1. As described in the subsequent paragraphs, Dominion Energy Virginia has concluded that the justifications presented in TSTF-577, Rev. 1, and the safety evaluation prepared by the NRC staff are applicable to NAPS Units 1 and 2 and justify this amendment for the incorporation of the changes into the NAPS TS.

The current SG TS requirements are based on TSTF-510, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection." Both NAPS Units 1 and 2 SGs have Alloy 690 thermally treated (Alloy 690TT) tubes. The current

inspection period following implementation of TSTF-577, Rev. 1, will be established as beginning in March 2018 for NAPS Unit 1 and March 2019 for NAPS Unit 2. Dominion Energy Virginia will submit a SG Tube Inspection Report meeting the revised TS 5.6.7 requirements within 30 days after implementation of the license amendment.

2.2 Variations

Dominion Energy Virginia is not proposing any technical variations or deviations from the TS changes described in TSTF-577, Rev. 1, or the applicable parts of the NRC staff's safety evaluation dated April 14, 2021. (ADAMS Accession No. ML21098A188).

The NAPS TS utilize different numbering than the Standard Technical Specifications on which TSTF-577, Rev. 1, was based. Specifically, the "Steam Generator (SG) Program" is numbered 5.5.8 in the NAPS Units 1 and 2 TS rather than 5.5.9 as stated in the TSTF. This difference is administrative and does not affect the applicability of TSTF-577, Rev. 1, to the NAPS Units 1 and 2 TS.

The NAPS Units 1 and 2 TS contains a requirement that differs from the Standard Technical Specifications on which TSTF-577, Rev. 1, was based but is encompassed in the TSTF-577, Rev.1, justification. Specifically, NAPS Units 1 and 2 TS 5.5.8, "Steam Generator (SG) Program," item b.2, states, "Leakage is not to exceed 1 gpm for **all** SGs," rather than, "Leakage is not to exceed 1 gpm **per** SG;" however, the NAPS TS requirement for SG leakage is more conservative and is therefore acceptable.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

Dominion Energy Virginia requests adoption of TSTF 577, Rev. 1, "Revised Frequencies for Steam Generator Tube Inspections." The Technical Specifications (TS) related to steam generator tube inspections and reporting are revised based on operating history. Dominion Energy Virginia has evaluated if a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. *Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?*

   Response: No.

   The proposed change revises the inspection frequencies for steam generator tube inspections and associated reporting requirements. Inspection frequencies

are not an initiator to a steam generator tube rupture accident, or any other accident previously evaluated. As a result, the probability of any accident previously evaluated is not significantly increased. The SG tubes inspected by the SG Program continue to be required to meet the SG Program performance criteria and to be capable of performing any functions assumed in the accident analysis. As a result, the consequences of any accident previously evaluated are not significantly increased.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?*

   Response: No.

   The proposed change revises the inspection frequencies for steam generator tube inspections and associated reporting requirements. The proposed change does not alter the design function or operation of the SGs or the ability of an SG to perform the design function. The SG tubes continue to be required to meet the SG Program performance criteria. The proposed change does not create the possibility of a new or different kind of accident due to credible new failure mechanisms, malfunctions, or accident initiators that are not considered in the design and licensing bases.

   Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *Does the proposed amendment involve a significant reduction in a margin of safety?*

   Response: No.

   The proposed change revises the inspection frequencies for steam generator tube inspections and associated reporting requirements. The proposed change does not change any of the controlling values of parameters used to avoid exceeding regulatory or licensing limits. The proposed change does not affect a design basis or safety limit, or any controlling value for a parameter established in the UFSAR or the license.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Dominion Energy Virginia concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

3.2 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

4.0 ENVIRONMENTAL EVALUATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve:

(i) a significant hazards consideration,

(ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or

(iii) a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

ATTACHMENT 1

Proposed Technical Specification Changes (Mark-up)

Virginia Electric and Power Company
(Dominion Energy Virginia)
North Anna Power Station Unit 1 and Unit 2

5.5 Programs and Manuals

5.5.7 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

a. Testing frequencies specified in the ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda as follows:

ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

d. Nothing in the ASME Code for Operation and Maintenance of Nuclear Power Plants shall be construed to supersede the requirements of any TS.

5.5.8 Steam Generator (SG) Program

An SG~~Steam Generator~~ Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the SG~~Steam Generator~~ Program shall include the following:

a. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during a SG inspection outage, as determined from the inservice

(continued)

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program

a. (continued)
inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged to confirm that the performance criteria are being met.

b. Performance criteria for SG tube integrity. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.

1. Structural integrity performance criterion: All in-service SG ~~steam generator~~ tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down), and all anticipated transients included in the design specification, design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady state full power operation primary to secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary to secondary pressure differentials. Apart from the above requirements, additional loading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse. In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.

2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 1 gpm for all SGs.

3. The operational LEAKAGE performance criterion is specified " in LCO 3.4.13, RCS Operational LEAKAGE."

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program (continued)

c. Provisions for SG tube plugging criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.

d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. A degradation assessment shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.

2. After the first refueling outage following SG installation, inspect each SG at least every ~~72~~ effective full power months ~~or at least every third refueling outage (whichever results in more frequent inspections). In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a, b, c and d below. If a degradation assessment indicates the potential for a type of degradation to occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy the applicable plugging criteria, the minimum number of locations inspected with such a capable inspection technique during the remainder of the inspection period may be prorated. The fraction of locations to be inspected for this potential type of degradation at this location at the end of the inspection period shall be no less than the ratio of the number of times the SG is scheduled to~~ (~~continued~~)

100% of the tubes in

96

, which defines the inspection period.

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program (continued)

2. (continued)
~~be inspected in the inspection period after the determination that a new form of degradation could potentially be occurring at this location divided by the total number of times the SG is scheduled to be inspected in the inspection period. Each inspection period defined below may be extended up to 3 effective full power months to include a SG inspection outage in an inspection period and the subsequent inspection period begins at the conclusion of the included SG inspection outage.~~

a. ~~After the first refueling outage following SG installation, inspect 100% of the tubes during the next 144 effective full power months. This constitutes the first inspection period;~~

b. ~~During the next 120 effective full power months, inspect 100% of the tubes. This constitutes the second inspection period;~~

c. ~~During the next 96 effective full power months, inspect 100% of the tubes. This constitutes the third inspection period; and~~

d. ~~During the remaining life of the SGs, inspect 100% of the tubes every 72 effective full power months. This constitutes the fourth and subsequent inspection periods.~~

3. If crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall ~~not exceed 24 effective full power months or one~~ be at the next refueling outage ~~(whichever results in more frequent inspections)~~. If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program (continued)

e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.5.9 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation and low pressure turbine disc stress corrosion cracking. The program shall include:

a. Identification of a sampling schedule for the critical variables and control points for these variables;

b. Identification of the procedures used to measure the values of the critical variables;

c. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in leakage;

d. Procedures for the recording and management of data;

e. Procedures defining corrective actions for all off control point chemistry conditions; and

f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.10 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems in general conformance with the frequencies and requirements of Regulatory Positions C.5.a, C.5.c, C.5.d, and C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, and ANSI N510-1975.

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 1.0% when tested in accordance

(continued)

5.6 Reporting Requirements

5.6.7 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.8, "Steam Generator (SG) Program." The report shall include:

a. The scope of inspections performed on each SG,

~~b. Degradation mechanisms found,~~

~~c. Nondestructive examination techniques utilized for each degradation mechanism,~~

~~d. Location, orientation (if linear), and measured sizes (if available) of service induced indications,~~

~~e. Number of tubes plugged during the inspection outage for each degradation mechanism,~~

e f. The number and percentage of tubes plugged to date, and the effective plugging percentage in each steam generator, and

~~g. The results of condition monitoring, including the results of tube pulls and in-situ testing.~~

b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;

c. For each degradation mechanism found:

1. The nondestructive examination techniques utilized;

2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;

3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and

4. The number of tubes plugged during the inspection outage.

d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results;

f. The results of any SG secondary side inspections.

ATTACHMENT 2

Revised Technical Specification Pages

Virginia Electric and Power Company
(Dominion Energy Virginia)
North Anna Power Station Unit 1 and Unit 2

5.5 Programs and Manuals

5.5.7 Inservice Testing Program

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b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

d. Nothing in the ASME Code for Operation and Maintenance of Nuclear Power Plants shall be construed to supersede the requirements of any TS.

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An SG Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the SG Program shall include the following:

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5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program

a. (continued)

inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged to confirm that the performance criteria are being met.

b. Performance criteria for SG tube integrity. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.

1. Structural integrity performance criterion: All in-service SG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down), and all anticipated transients included in the design specification, design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady state full power operation primary to secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary to secondary pressure differentials. Apart from the above requirements, additional loading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse. In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.

2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 1 gpm for all SGs.

3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program (continued)

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1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.

2. After the first refueling outage following SG installation, inspect 100% of the tubes in each SG at least every 96 effective full power months, which defines the inspection period.

3. If crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the next refueling outage. If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program (continued)

e. Provisions for monitoring operational primary to secondary LEAKAGE.

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b. Identification of the procedures used to measure the values of the critical variables;

c. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in leakage;

d. Procedures for the recording and management of data;

e. Procedures defining corrective actions for all off control point chemistry conditions; and

f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.10 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems in general conformance with the frequencies and requirements of Regulatory Positions C.5.a, C.5.c, C.5.d, and C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, and ANSI N510-1975.

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 1.0% when tested in accordance

(continued)

5.6 Reporting Requirements

5.6.7 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.8, "Steam Generator (SG) Program." The report shall include:

a. The scope of inspections performed on each SG,

b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;

c. For each degradation mechanism found:

1. The nondestructive examination techniques utilized;

2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;

3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and

4. The number of tubes plugged during the inspection outage.

d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results;

e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each steam generator, and

f. The results of any SG secondary side inspections.