



October 21, 2021

Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Serial No.: 21-268
NRA/MLW: R4
Docket Nos.: 50-245/336/423
50-338/339
50-280/281
License Nos.: DPR-21/65
NPF-49
NPF-4/7
DPR-32/37

DOMINION ENERGY NUCLEAR CONNECTICUT, INC.
VIRGINIA ELECTRIC AND POWER COMPANY
MILLSTONE POWER STATION UNITS 1, 2, AND 3
NORTH ANNA POWER STATION UNITS 1 AND 2
SURRY POWER STATION UNITS 1 AND 2
PROPOSED AMENDMENT TO RELOCATE UNIT STAFF QUALIFICATION
REQUIREMENTS FROM TECHNICAL SPECIFICATIONS TO NUCLEAR FACILITY
QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD)

Pursuant to the provisions of Title 10 of the Code of Federal Regulations (10 CFR), Part 50.90, "Application for Amendment of License, Construction Permit, or Early Site Permit," Dominion Energy Nuclear Connecticut, Inc. (DENC) and Virginia Electric and Power Company (Dominion Energy Virginia) hereby submit requests for amendments to the Technical Specifications (TS) for Millstone Power Station (MPS) Units 1, 2, and 3, North Anna Power Station (NAPS) Units 1 and 2, and Surry Power Station (SPS) Units 1 and 2.

The proposed amendment would modify MPS Unit 1 Technical Specification (TS) 5.3.1, MPS Unit 2 and 3 TS 6.3.1, NAPS TS 5.3.1, and SPS TS 6.1.3 by relocating requirements related to "Facility Staff Qualifications"/"Unit Staff Qualifications" respectively, to the Dominion Energy Nuclear Facility Quality Assurance Program description (QAPD) consistent with guidance contained in NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls to Quality Assurance."

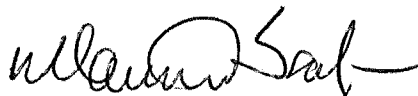
Enclosures 1 through 3 provide attachments with a description and assessment of the proposed changes for each site, existing TS pages marked-up to show the proposed changes, the revised (clean) TS pages, the No Significant Hazards Consideration, and a list of references relative to each TS.

DENC and Dominion Energy Virginia request approval of the proposed license amendments by December 1, 2022, with a 60-day implementation period.

In accordance with 10 CFR 50.91, "Notice for Public Comment; State Consultation," a copy of this application, with attachments, is being provided to the designated Connecticut and Virginia State Officials.

Should you have any questions, please contact Mr. Michael Whitlock at (804)-273-3123.

Respectfully,



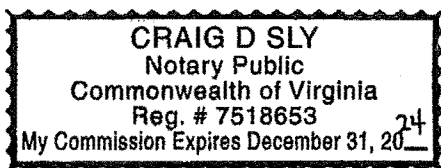
Mark D. Sartain
Vice President – Nuclear Engineering and Fleet Support
Dominion Energy Nuclear Connecticut, Inc.
Virginia Electric and Power Company

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain, who is Vice President – Nuclear Engineering and Fleet Support of Dominion Energy Nuclear Connecticut, Inc. and 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 those Companies, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 21ST day of October, 2021.

My Commission Expires: 12/31/24


Notary Public

Commitments made in this letter: None.

Enclosures:

- Enclosure 1. Request for Amendments to the Technical Specifications for Millstone Power Station Units 1, 2, and 3
 - Attachment A. Description and Assessment
 - Attachment B. Existing TS Pages Mark-up Unit 1
 - Attachment C. Revised (Clean) TS Pages Unit 1
 - Attachment D. Existing TS Pages Mark-up Unit 2
 - Attachment E. Revised (Clean) TS Pages Unit 2
 - Attachment F. Existing TS Pages Mark-up Unit 3
 - Attachment G. Revised (Clean) TS Pages Unit 3

Attachment H. No Significant Hazards Consideration

Attachment I. References

Enclosure 2. Request for Amendments to the Technical Specifications for North Anna Power Station Units 1 and 2

Attachment A. Description and Assessment

Attachment B. Existing TS Pages Mark-up

Attachment C. Revised (Clean) TS Pages

Attachment D. No Significant Hazards Consideration

Attachment E. References

Enclosure 3. Requests for Amendments to the Technical Specifications for Surry Power Station Units 1 and 2

Attachment A. Description and Assessment

Attachment B. Existing TS Pages Mark-up

Attachment C. Revised (Clean) TS Pages

Attachment D. No Significant Hazards Consideration

Attachment E. References

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NRC Senior Resident Inspector
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Enclosure 1

**Request for Amendments to the Technical Specifications for
Millstone Power Station Units 1, 2, and 3**

Enclosure 1, Attachment A

Description and Assessment

DESCRIPTION AND ASSESSMENT

1.0 SUMMARY

Dominion Energy Nuclear Connecticut (DENC) requests an amendment to the Millstone Power Station (MPS) Unit 1, 2, and 3 Facility Operating Licenses. Specifically, this license amendment request (LAR) proposes to relocate specific administrative controls in the Millstone Unit 1 Technical Specifications (TS) 5.3.1, Millstone Unit 2 TS 6.3.1, and Millstone Unit 3 TS 6.3.1, "Facility Staff Qualifications," to the Dominion Energy Nuclear Facility Quality Assurance Program Description (QAPD). Since the commitments for "Facility Staff Qualifications" already exist in the QAPD, the revised TS administrative controls will reference the QAPD versus the specific ANS/ANSI standard endorsed by Regulatory Guide 1.8.

2.0 DETAILED DESCRIPTION

2.1 Current Requirements and Proposed Change

MPS Unit 1 TS 5.3.1 **currently** states:

5.3 Facility Staff Qualifications

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. Exceptions to this requirement are specified in the Quality Assurance Program.

Proposed MPS Unit 1 TS 5.3.1 **be revised** to state:

5.3 Facility Staff Qualifications

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.

MPS Unit 2 TS 6.3.1 **currently** states:

6.3 Facility Staff Qualifications

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971* for comparable positions. Exceptions to this requirement are specified in the Quality Assurance Program.

*As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.

Proposed MPS Unit 2 TS 6.3.1 **be revised** to state:

6.3 Facility Staff Qualifications

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.

MPS Unit 3 TS 6.3.1 **currently** states:

6.3 Facility Staff Qualifications

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971* for comparable positions. Exceptions to this requirement are specified in the Quality Assurance Program

*As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.

Proposed MPS Unit 3 TS 6.3.1 **be revised** to state:

6.3 Facility Staff Qualifications

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.

2.2 Reason for the Proposed Change

These changes are proposed for MPS 1, 2, and 3 and will provide flexibility in adopting updated NRC endorsed standards for facility staff qualifications without the need to submit license amendment requests (LARs). The change process in 10 CFR 50.54(a) is utilized for QAPD changes. This change is consistent with guidance contained in NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

3.0 ASSESSMENT

3.1 Condition Assessment

10 CFR 50.36(c)(5) requires TS to include administrative controls. These are provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. AL 95-06 states that many license amendments were being processed that involved relocating

requirements that do not satisfy the criteria of 10 CFR 50.36 for inclusion as limiting conditions for operation and relocating requirements that are controlled directly by regulations and related licensee programs. The AL states:

"Increasingly, licensees are requesting amendments to technical specifications that are located in the "administrative controls" section and are related to quality assurance programs. Licensees have frequently requested amendments to these specifications because they contain detailed information that is affected by organizational and process changes. Many licensees have revised their technical specifications to remove excessive detail, thereby gaining flexibility in making organizational changes without the need for a license amendment. Recent amendment requests related to quality assurance have also followed the trend for other technical specifications and have included moving requirements to licensee controlled documents and programs. The quality assurance program is a logical candidate for such relocations due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existence of U.S. Nuclear Regulatory Commission-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). The relocation of technical specification requirements in cases where adequate controls are provided by such other methods can reduce the resources spent by licensees and the U.S. Nuclear Regulatory Commission staff in preparing and reviewing license amendment requests."

The proposed change is consistent with the guidance in AL 95-06. The unit staff qualifications do not satisfy the criteria of 10 CFR 50.36 for inclusion in the TS as an Administrative Control. Changes to the QAPD are adequately controlled by other regulations and the QAPD is therefore an acceptable location for the unit staff qualification requirements. Specifically, consistent with the guidance in AL 95-06, future changes to the QAPD staff qualification requirements will be evaluated under the 10 CFR 50.54(a) evaluation process.

3.2 Assessment Summary

DENC is requesting approval to move the referenced ANSI standard in the facility staff qualification requirements of the TS to the QAPD. The referenced ANSI standard and Regulatory Guide 1.8 alternative in the QAPD currently aligns with the existing TS requirement. Future changes to the QAPD will be controlled via the 10 CFR 50.54(a) evaluation process.

No Significant Hazards Consideration

DENC has evaluated the proposed amendment against the criteria in 10 CFR 50.92 and has determined that the operation of MPS 1, 2, and 3 in accordance with the proposed amendment presents no significant hazards. The DENC evaluation against each of the criteria in 10 CFR 50.92 is provided as Attachment H to this Enclosure.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Acceptance Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met. The following current applicable regulations and regulatory requirements were reviewed:

10 CFR 50.36

10 CFR 50.36, "Technical Specifications," Paragraph (c)(5), "Administrative Controls," requires the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting that are necessary to assure operation of the facility in a safe manner be included in the TS.

10 CFR 50.120

10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel," requires that each nuclear power plant licensee or applicant for an operator license establish, implement, and maintain the training and qualification programs that are derived from a systems approach to training as defined in 10 CFR 55.4.

10 CFR Part 55

10 CFR Part 55, "Operators' Licenses," Subpart D, "Applications," requires that operator license applications include information concerning an individual's education, experience, and other related matters to provide evidence and certification that the applicant has successfully completed the facility licensee's training program that is based on a systems approach to training.

NUREG-1021, Revision 12

NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 12, establishes the policies, procedures, and practices for examining licensees and applicants for reactor operator and senior reactor operator licenses at nuclear power reactor facilities under 10 CFR Part 55, "Operators' Licenses."

Regulatory Guide 1.8

Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," describes a method that the NRC staff finds acceptable for complying with the NRC's regulations regarding training and qualification of nuclear power plant personnel. The proposed change would eliminate the unit staff qualification requirements from the TS and maintain the current commitments to RG 1.8 along with any exceptions, alternatives, or clarifications as identified in the current QAPD.

4.2 Precedent

On April 14, 2016 Tennessee Valley Authority (TVA) submitted an LAR to revise TS 5.3, "Unit Staff Qualifications," by deleting references to Regulatory Guide 1.8, Revision 2 (endorses ANSI 3.1-1981) and replace it with reference to the TVA Nuclear Quality Assurance Plan. The LAR was applicable to Browns Ferry and Sequoyah. On March 27, 2017 the NRC approved the LAR from TVA (ML17034A360). Duke Energy, Exelon, and Diablo Canyon have also received approval of similar amendments (ML20083F927, ML18206A282, and ML20083F927 respectively).

4.3 Conclusion

DENC has evaluated the proposed change against the applicable regulatory requirements and acceptance criteria and has determined that the applicable regulatory requirements continue to be met. 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.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

Enclosure 1, Attachment B

Existing TS Pages Mark-up Unit 1

~~September 8, 2016~~
Facility Staff Qualifications
5.3

ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

5.3.1 ~~Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. Exceptions to this requirement are specified in the Quality Assurance Program.~~ Each member of the facility staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.

5.3.2 The operations manager or at least one operations middle manager shall be a CERTIFIED FUEL HANDLER.

Enclosure 1, Attachment C

Revised (Clean) TS Pages Unit 1

Facility Staff Qualifications
5.3

ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.

5.3.2 The operations manager or at least one operations middle manager shall be a CERTIFIED FUEL HANDLER.

Enclosure 1, Attachment D

Existing TS Pages Mark-up Unit 2

~~May 20, 2015~~

ADMINISTRATIVE CONTROLS

FACILITY STAFF (CONTINUED)

- d. A radiation protection technician shall be on site when fuel is in the reactor. (Table 6.2-1)
- e. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. Deleted

6.3 FACILITY STAFF QUALIFICATIONS

- 6.3.1 ~~Each member of the facility staff shall meet or exceed the minimum qualifications of ANSIN18.1-1971* for comparable positions. Exceptions to this requirement are specified in the Quality Assurance Program.~~ Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.
- 6.3.2 The operations manager or at least one operations middle manager shall hold a senior reactor operator license for Millstone Unit No. 2.

* ~~As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.~~

MILLSTONE - UNIT 2

6-2

Amendment No. 136, 142, 163, 178,
190, 191, 253, 270, 288, 308, 320

Enclosure 1, Attachment E

Revised (Clean) TS Pages Unit 2

ADMINISTRATIVE CONTROLS

FACILITY STAFF (CONTINUED)

- d. A radiation protection technician shall be on site when fuel is in the reactor. (Table 6.2-1)
- e. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. Deleted

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.

6.3.2 The operations manager or at least one operations middle manager shall hold a senior reactor operator license for Millstone Unit No. 2.

MILLSTONE - UNIT 2

6-2

~~Amendment No. 136, 142, 163, 178,
190, 191, 255, 270, 288, 308, 320~~

Enclosure 1, Attachment F

Existing TS Pages Mark-up Unit 3

~~May 20, 2015~~

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

~~6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971* for comparable positions. Exceptions to this requirement are specified in the Quality Assurance Program. Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.~~

6.3.2 The operations manager or at least one operations middle manager shall hold a senior reactor operator license for Millstone Unit No. 3.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff that meets or exceeds the requirements as specified in the Quality Assurance Program and 10 CFR Part 55.59 shall be maintained.

6.4.2 Deleted.

6.5 DELETED.

* ~~As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.~~

MILLSTONE - UNIT 3

6-5

Amendment No. ~~36, 69, 84, 90, 94,
130, 132, 135, 171, 173, 199, 212, 226,
261~~

Enclosure 1, Attachment G

Revised (Clean) TS Pages Unit 3

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description.

6.3.2 The operations manager or at least one operations middle manager shall hold a senior reactor operator license for Millstone Unit No. 3.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff that meets or exceeds the requirements as specified in the Quality Assurance Program and 10 CFR Part 55.59 shall be maintained.

6.4.2 Deleted.

6.5 DELETED.

MILLSTONE - UNIT 3

6-5

~~Amendment No. 36, 69, 84, 90, 94,
130, 132, 135, 171, 173, 190, 212, 226,
261~~

Enclosure 1, Attachment H

NO SIGNIFICANT HAZARDS CONSIDERATION

NO SIGNIFICANT HAZARDS CONSIDERATION

Dominion Energy Nuclear Connecticut, Inc. (DENC) has evaluated the proposed amendment against the criteria in 10 CFR 50.92 and has determined that the operation of Millstone Power Station (MPS) in accordance with the proposed amendment presents no significant hazards. The DENC evaluation against each of the criteria in 10 CFR 50.92 is discussed below:

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

Response: No.

The proposed change improves consistency in administrative controls and does not make any physical changes to the plant. The proposed change does not alter any accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents.

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

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

Response: No.

The proposed change does not impact the accident analyses. The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed), a change in the method of plant operation, or new operator actions. The proposed change does not introduce failure modes that could result in a new accident, and the change does not alter assumptions made in the safety analysis. The proposed change does not alter or prevent the ability of the operators to perform their intended actions to mitigate the consequences of an accident or event.

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 change involve a significant reduction in the margin of safety?

Response: No.

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. The proposed change does not impact operation of the plant or its response to transients or accidents. The proposed change does not involve a change in the method of plant operation, and no accident analyses will

be affected by the proposed change. Safety analysis acceptance criteria are not affected by this proposed change.

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

Based on the above, DENC concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92, and, accordingly, a finding of "no significant hazards consideration" is justified.

Enclosure 1, Attachment I

REFERENCES

1. Dominion Energy Nuclear Facility Quality Assurance Program Description (QAPD) Topical Report, DOM-QA-1, "Nuclear Facility Quality Assurance Program Description," Revision 30
2. ML031110271, NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995
3. ML17034A360, Browns Ferry Nuclear Plant, Units 1, 2, and 3, and Sequoyah Nuclear Plant Units 1 and 2 – Issuance of Amendments RE: Changes to Technical Specification 5.3, "Unit Staff Qualifications" dated March 27, 2017.

Enclosure 2

**Request for Amendments to the Technical Specifications for
North Anna Power Station Units 1 and 2**

Enclosure 2, Attachment A

Description and Assessment

DESCRIPTION AND ASSESSMENT

1.0 SUMMARY

Virginia Electric and Power Company (Dominion Energy Virginia) requests an amendment to the North Anna Power Station (NAPS) Units 1 & 2 Facility Operating License. Specifically, this license amendment request (LAR) proposes to relocate specific administrative controls in North Anna Units 1 & 2 Technical Specifications (TS) 5.3.1, "Unit Staff Qualifications," to the Dominion Energy Nuclear Facility Quality Assurance Program Description (QAPD). Since the commitments for "Unit Staff Qualifications" already exist in the QAPD, the revised TS administrative control 5.3.1 will reference the QAPD versus the specific ANS/ANSI standard endorsed by Regulatory Guide 1.8.

2.0 DETAILED DESCRIPTION

2.1 Current Requirements and Proposed Change

TS 5.3 **currently** states:

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI 3.1 (12/79 Draft) for the comparable positions. Exceptions to this requirement are specified in the QA Program. The SM, Unit Supervisor, Control Room Operator, and the individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the minimum qualifications of 10 CFR 55.59(c) and 55.31(a)(4).

Dominion Energy Virginia proposes that TS 5.3 **be revised** to state:

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description. The SM, Unit Supervisor, Control Room Operator, and the individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the minimum qualifications of 10 CFR 55.59(c) and 55.31(a)(4).

2.2 Reason for the Proposed Change

This proposed change will provide flexibility in adopting updated NRC endorsed standards for unit staff qualifications without the need to submit LARs. The 10 CFR 50.54(a) process is utilized for QAPD changes. This change is consistent with guidance contained in NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

3.0 ASSESSMENT

3.1 Condition Assessment

10 CFR 50.36(c)(5) requires TS to include administrative controls. These are provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. AL 95-06 states that many license amendments were being processed that involved relocating requirements that do not satisfy the criteria of 10 CFR 50.36 for inclusion as limiting conditions for operation, and relocating requirements that are controlled directly by regulations and related licensee programs. The AL states:

"Increasingly, licensees are requesting amendments to technical specifications that are located in the "administrative controls" section and are related to quality assurance programs. Licensees have frequently requested amendments to these specifications because they contain detailed information that is affected by organizational and process changes. Many licensees have revised their technical specifications to remove excessive detail, thereby gaining flexibility in making organizational changes without the need for a license amendment. Recent amendment requests related to quality assurance have also followed the trend for other technical specifications and have included moving requirements to licensee controlled documents and programs. The quality assurance program is a logical candidate for such relocations due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existence of U.S. Nuclear Regulatory Commission-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). The relocation of technical specification requirements in cases where adequate controls are provided by such other methods can reduce the resources spent by licensees and the U.S. Nuclear Regulatory Commission staff in preparing and reviewing license amendment requests."

The proposed change is consistent with the guidance in AL 95-06. The unit staff qualifications do not satisfy the criteria of 10 CFR 50.36 for inclusion in the TS as an Administrative Control. Changes to the QAPD are adequately controlled by other regulations and the QAPD is therefore an acceptable location for the unit staff qualification requirements. Specifically, consistent with the guidance in AL 95-06, future changes to the QAPD staff qualification requirements will be controlled under the 10 CFR 50.54(a) evaluation process.

3.2 Assessment Summary

Dominion Energy Virginia is requesting approval to move the referenced ANSI standard in the unit staff qualification requirements of the TS to the QAPD. The referenced ANSI

standard in the QAPD currently aligns with the existing TS requirement. Future changes to the QAPD will be controlled via the 10 CFR 50.54(a) evaluation process.

3.3 No Significant Hazards Consideration

Dominion Energy Virginia has evaluated the proposed amendment against the criteria in 10 CFR 50.92 and has determined that the operation of the NAPS in accordance with the proposed amendment presents no significant hazards. The Dominion Energy Virginia evaluation against each of the criteria in 10 CFR 50.92 is provided as Attachment D to this Enclosure.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Acceptance Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met. The following current applicable regulations and regulatory requirements were reviewed:

10 CFR 50.36

10 CFR 50.36, "Technical Specifications," Paragraph (c)(5), "Administrative Controls," requires the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting that are necessary to assure operation of the facility in a safe manner be included in the TS.

10 CFR 50.120

10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel," requires that each nuclear power plant licensee or applicant for an operator license establish, implement, and maintain the training and qualification programs that are derived from a systems approach to training as defined in 10 CFR 55.4.

10 CFR Part 55

10 CFR Part 55, "Operators' Licenses," Subpart D, "Applications," requires that operator license applications include information concerning an individual's education, experience, and other related matters to provide evidence and certification that the applicant has successfully completed the facility licensee's training program that is based on a systems approach to training.

NUREG-1021, Revision 12

NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 12, establishes the policies, procedures, and practices for examining licensees

and applicants for reactor operator and senior reactor operator licenses at nuclear power reactor facilities under 10 CFR Part 55, "Operators' Licenses."

Regulatory Guide 1.8

Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," describes a method that the NRC staff finds acceptable for complying with the NRC's regulations regarding training and qualification of nuclear power plant personnel. The proposed change would eliminate the unit staff qualification requirements from the TS and maintain the current commitments to RG 1.8 along with any exceptions, alternatives, or clarifications as identified in the current QAPD.

4.2 Precedent

On April 14, 2016 Tennessee Valley Authority (TVA) submitted an LAR to revise TS 5.3, "Unit Staff Qualifications," by deleting references to Regulatory Guide 1.8, Revision 2 (endorses ANSI 3.1-1981) and replace it with reference to the TVA Nuclear Quality Assurance Plan. The LAR was applicable to Browns Ferry and Sequoyah. On March 27, 2017 the NRC approved the LAR from TVA (ML17034A360). Duke Energy, Exelon, and Diablo Canyon have also received approval of similar amendments (ML20083F927, ML18206A282, and ML20083F927 respectively).

4.3 Conclusion

Dominion Energy Virginia has evaluated the proposed change against the applicable regulatory requirements and acceptance criteria and has determined that the applicable regulatory requirements continue to be met. 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.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

Enclosure 2, Attachment B

Existing TS Pages Mark-up Unit 1 and 2

Unit Staff Qualifications
5.3

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

- 5.3.1 ~~Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI 3.1 (12/70 Draft) for the comparable positions. Exceptions to this requirement are specified in the QA Program.~~ Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description. The SM, Unit Supervisor, Control Room Operator, and the individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the minimum qualifications of 10 CFR 55.59(c) and 55.31(a) (4).
- 5.3.2 For the purpose of 10 CFR 55.4, a licensed SRO and a licensed RO are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
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Enclosure 2, Attachment C

Revised (Clean) TS Pages Unit 1 and 2

Unit Staff Qualifications
5.3

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description. The SM, Unit Supervisor, Control Room Operator, and the individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the minimum qualifications of 10 CFR 55.59(c) and 55.31(a)(4).
- 5.3.2 For the purpose of 10 CFR 55.4, a licensed SRO and a licensed RO are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
-

Enclosure 2, Attachment D

NO SIGNIFICANT HAZARDS CONSIDERATION

NO SIGNIFICANT HAZARDS CONSIDERATION

Virginia Electric and Power Company (Dominion Energy Virginia) has evaluated the proposed amendment against the criteria in 10 CFR 50.92 and has determined that the operation of North Anna Power Station (NAPS) in accordance with the proposed amendment presents no significant hazards. The Dominion Energy Virginia evaluation against each of the criteria in 10 CFR 50.92 is discussed below:

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

Response: No.

The proposed change improves consistency in administrative controls and does not make any physical changes to the plant. The proposed change does not alter any accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents.

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

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

Response: No.

The proposed change does not impact the accident analyses. The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed), a change in the method of plant operation, or new operator actions. The proposed change does not introduce failure modes that could result in a new accident, and the change does not alter assumptions made in the safety analysis. The proposed change does not alter or prevent the ability of the operators to perform their intended actions to mitigate the consequences of an accident or event.

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 change involve a significant reduction in the margin of safety?

Response: No.

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. The proposed change does not impact operation of the plant or its response to transients or accidents. The proposed change does not involve a change in the method of plant operation, and no accident analyses will

be affected by the proposed change. Safety analysis acceptance criteria are not affected by this proposed change.

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

Based on the above, Dominion Energy Virginia concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92, and, accordingly, a finding of "no significant hazards consideration" is justified.

Enclosure 2, Attachment E

REFERENCES

1. Dominion Energy Nuclear Facility Quality Assurance Program Description (QAPD) Topical Report, DOM-QA-1, "Nuclear Facility Quality Assurance Program Description," Revision 30
2. ML031110271, NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995
3. ML17034A360, Browns Ferry Nuclear Plant, Units 1, 2, and 3, and Sequoyah Nuclear Plant Units 1 and 2 – Issuance of Amendments RE: Changes to Technical Specification 5.3, "Unit Staff Qualifications" dated March 27, 2017.

Enclosure 3

**Request for Amendments to the Technical Specifications for
Surry Power Station Units 1 and 2**

Enclosure 3, Attachment A

Description and Assessment

DESCRIPTION AND ASSESSMENT

1.0 SUMMARY

Virginia Electric and Power Company (Dominion Energy Virginia) requests an amendment to the Surry Power Station (SPS) Units 1 & 2 Facility Operating License. Specifically, this license amendment request (LAR) proposes to relocate specific administrative controls in the Surry Units 1 & 2 Technical Specifications (TS) 6.3.1, "Unit Staff Qualifications," to the Dominion Energy Nuclear Facility Quality Assurance Program Description (QAPD). Since the commitments for "Unit Staff Qualifications" already exist in the QAPD, the revised TS administrative control will reference the QAPD versus the specific ANS/ANSI standard endorsed by Regulatory Guide 1.8.

2.0 DETAILED DESCRIPTION

2.1 Current Requirements and Proposed Change

TS 6.1.3 **currently** states:

6.1.3 Unit Staff Qualifications

1. Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI 3.1 (12/79 Draft) for comparable positions. Exceptions to this requirement are specified in the QA Program. Incumbents in the position of Shift Manager, Unit Supervisor (SRO), Control Room Operator (RO), and the individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4).

Dominion Energy Virginia proposes that TS 6.1.3 **be revised** to state:

6.1.3 Unit Staff Qualifications

1. Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description. Incumbents in the position of Shift Manager, Unit Supervisor (SRO), Control Room Operator (RO), and the individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4).

2.2 Reason for the Proposed Change

This proposed change will provide flexibility in adopting updated NRC endorsed standards for unit staff qualifications without the need to submit LARs. The 10 CFR 50.54(a) process is utilized for QAPD changes. This change is consistent with guidance

contained in NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

3.0 ASSESSMENT

3.1 Condition Assessment

10 CFR 50.36(c)(5) requires TS to include administrative controls. These are provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. AL 95-06 states that many license amendments were being processed that involved relocating requirements that do not satisfy the criteria of 10 CFR 50.36 for inclusion as limiting conditions for operation, and relocating requirements that are controlled directly by regulations and related licensee programs. The AL states:

"Increasingly, licensees are requesting amendments to technical specifications that are located in the "administrative controls" section and are related to quality assurance programs. Licensees have frequently requested amendments to these specifications because they contain detailed information that is affected by organizational and process changes. Many licensees have revised their technical specifications to remove excessive detail, thereby gaining flexibility in making organizational changes without the need for a license amendment. Recent amendment requests related to quality assurance have also followed the trend for other technical specifications and have included moving requirements to licensee controlled documents and programs. The quality assurance program is a logical candidate for such relocations due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existence of U.S. Nuclear Regulatory Commission-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). The relocation of technical specification requirements in cases where adequate controls are provided by such other methods can reduce the resources spent by licensees and the U.S. Nuclear Regulatory Commission staff in preparing and reviewing license amendment requests."

The proposed change is consistent with the guidance in AL 95-06. The unit staff qualifications do not satisfy the criteria of 10 CFR 50.36 for inclusion in the TS as an Administrative Control. Changes to the QAPD are adequately controlled by other regulations and the QAPD is therefore an acceptable location for the unit staff qualification requirements. Specifically, consistent with the guidance in AL 95-06, future changes to the QAPD staff qualification requirements will be controlled under the 10 CFR 50.54(a) evaluation process.

3.2 Assessment Summary

Dominion Energy Virginia is requesting approval to move the referenced ANSI standard in the unit staff qualification requirements of the TS to the QAPD. The referenced ANSI standard in the QAPD currently aligns with the existing TS requirement. Future changes to the QAPD will be controlled via the 10 CFR 50.54(a) evaluation process.

3.3 No Significant Hazards Consideration

Dominion Energy Virginia has evaluated the proposed amendment against the criteria in 10 CFR 50.92 and has determined that the operation of the SPS in accordance with the proposed amendment presents no significant hazards. The Dominion Energy Virginia evaluation against each of the criteria in 10 CFR 50.92 is provided as Attachment D to this Enclosure.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Acceptance Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met. The following current applicable regulations and regulatory requirements were reviewed:

10 CFR 50.36

10 CFR 50.36, "Technical Specifications," Paragraph (c)(5), "Administrative Controls," requires the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting that are necessary to assure operation of the facility in a safe manner be included in the TS.

10 CFR 50.120

10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel," requires that each nuclear power plant licensee or applicant for an operator license establish, implement, and maintain the training and qualification programs that are derived from a systems approach to training as defined in 10 CFR 55.4.

10 CFR Part 55

10 CFR Part 55, "Operators' Licenses," Subpart D, "Applications," requires that operator license applications include information concerning an individual's education, experience, and other related matters to provide evidence and certification that the applicant has successfully completed the facility licensee's training program that is based on a systems approach to training.

NUREG-1021, Revision 12

NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 12, establishes the policies, procedures, and practices for examining licensees and applicants for reactor operator and senior reactor operator licenses at nuclear power reactor facilities under 10 CFR Part 55, "Operators' Licenses."

Regulatory Guide 1.8

Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," describes a method that the NRC staff finds acceptable for complying with the NRC's regulations regarding training and qualification of nuclear power plant personnel. The proposed change would eliminate the unit staff qualification requirements from the TS and maintain the current commitments to RG 1.8 along with any exceptions, alternatives, or clarifications as identified in the current QAPD.

4.2 Precedent

On April 14, 2016 Tennessee Valley Authority (TVA) submitted an LAR to revise TS 5.3, "Unit Staff Qualifications," by deleting references to Regulatory Guide 1.8, Revision 2 (endorses ANSI 3.1-1981) and replace it with reference to the TVA Nuclear Quality Assurance Plan. The LAR was applicable to Browns Ferry and Sequoyah. On March 27, 2017 the NRC approved the LAR from TVA (ML17034A360). Duke Energy, Exelon, and Diablo Canyon have also received approval of similar amendments (ML20083F927, ML18206A282, and ML20083F927 respectively).

4.3 Conclusion

Dominion Energy Virginia has evaluated the proposed change against the applicable regulatory requirements and acceptance criteria and has determined that the applicable regulatory requirements continue to be met. 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.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant

to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

Enclosure 3, Attachment B

Existing TS Pages Mark-up Unit 1 and 2

TS 6.1-2
~~09-15-05~~

2. Unit Staff

The unit staff organization shall include the following:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition for each unit as shown in Table 6.1-1.
- b. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the position.
- c. All core alterations shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling who has no other concurrent responsibilities during this operation.
- d. The operations manager shall hold (or have previously held) a Senior Reactor Operator License for Surry Power Station or a similar design Pressurized Water Reactor plant. The Supervisor Nuclear Shift Operations shall hold an active Senior Reactor Operator License for Surry Power Station.
- e. Procedures will be established to insure that NRC policy statement guidelines regarding working hours established for employees are followed. In addition, procedures will provide for documentation of authorized deviations from those guidelines and that the documentation is available for NRC review.

6.1.3 Unit Staff Qualifications

1. ~~Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI 3.1 (12/79 Draft) for comparable positions. Exceptions to this requirement are specified in the QA Program.~~ Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description. Incumbents in the positions of Shift Manager, Unit Supervisor (SRO), Control Room Operator (RO), and the individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4).
2. For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator and a licensed Reactor Operator are those individuals who, in addition to meeting the requirements of TS 6.1.3.1 perform the functions described in 10 CFR 50.54(m).

Enclosure 3, Attachment C

Revised (Clean) TS Pages Unit 1 and 2

TS 6.1-2

2. Unit Staff

The unit staff organization shall include the following:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition for each unit as shown in Table 6.1-1.
- b. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the position.
- c. All core alterations shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling who has no other concurrent responsibilities during this operation.
- d. The operations manager shall hold (or have previously held) a Senior Reactor Operator License for Surry Power Station or a similar design Pressurized Water Reactor plant. The Supervisor Nuclear Shift Operations shall hold an active Senior Reactor Operator License for Surry Power Station.
- e. Procedures will be established to insure that NRC policy statement guidelines regarding working hours established for employees are followed. In addition, procedures will provide for documentation of authorized deviations from those guidelines and that the documentation is available for NRC review.

6.1.3 Unit Staff Qualifications

1. Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Nuclear Facility Quality Assurance Program Description. Incumbents in the positions of Shift Manager, Unit Supervisor (SRO), Control Room Operator (RO), and the individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4).
2. For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator and a licensed Reactor Operator are those individuals who, in addition to meeting the requirements of TS 6.1.3.1 perform the functions described in 10 CFR 50.54(m).

Enclosure 3, Attachment D

NO SIGNIFICANT HAZARDS CONSIDERATION

NO SIGNIFICANT HAZARDS CONSIDERATION

Virginia Electric and Power Company (Dominion Energy Virginia) has evaluated the proposed amendment against the criteria in 10 CFR 50.92 and has determined that the operation of Surry Power Station (SPS) in accordance with the proposed amendment presents no significant hazards. The Dominion Energy Virginia evaluation against each of the criteria in 10 CFR 50.92 is discussed below:

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

Response: No.

The proposed change improves consistency in administrative controls and does not make any physical changes to the plant. The proposed change does not alter any accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents.

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

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

Response: No.

The proposed change does not impact the accident analyses. The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed), a change in the method of plant operation, or new operator actions. The proposed change does not introduce failure modes that could result in a new accident, and the change does not alter assumptions made in the safety analysis. The proposed change does not alter or prevent the ability of the operators to perform their intended actions to mitigate the consequences of an accident or event.

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 change involve a significant reduction in the margin of safety?

Response: No.

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. The proposed change does not impact operation of the plant or its response to transients or accidents. The proposed change does not involve a change in the method of plant operation, and no accident analyses will

be affected by the proposed change. Safety analysis acceptance criteria are not affected by this proposed change.

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

Based on the above, Dominion Energy Virginia concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92, and, accordingly, a finding of "no significant hazards consideration" is justified.

Enclosure 3, Attachment E

REFERENCES

1. Dominion Energy Nuclear Facility Quality Assurance Program Description (QAPD) Topical Report, DOM-QA-1, "Nuclear Facility Quality Assurance Program Description," Revision 30
2. ML031110271, NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995
3. ML17034A360, Browns Ferry Nuclear Plant, Units 1, 2, and 3, and Sequoyah Nuclear Plant Units 1 and 2 – Issuance of Amendments RE: Changes to Technical Specification 5.3, "Unit Staff Qualifications" dated March 27, 2017.