



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 20, 2001

Mr. David A. Christian
Senior Vice President - Nuclear
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2 - ISSUANCE OF
AMENDMENTS RE: TECHNICAL SPECIFICATIONS CHANGES TO
INCREASE BORON CONCENTRATION LIMITS (TAC NOS. MA9362 AND
MA9363)

Dear Mr. Christian:

The Commission has issued the enclosed Amendment Nos. 225 and 206 to Facility Operating License Nos. NPF-4 and NPF-7 for the North Anna Power Station, Unit Nos. 1 and 2. The amendments change the Technical Specifications (TS) in response to your letter dated June 22, 2000, as supplemented November 15, 2000.

These amendments revise TS 3.1.2.7, TS 3.1.2.8, TS 3.5.1, TS 3.5.5, TS 3.6.2.2, and TS 3.9.1 to increase the boron concentration limits in the refueling water storage tank, casing cooling tank, safety injection accumulators, and the reactor coolant system during refueling.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in cursive script, reading "Stephen R. Monarque", is positioned above the typed name.

Stephen Monarque, Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-338 and 50-339

Enclosures:

1. Amendment No. 225 to NPF-4
2. Amendment No. 206 to NPF-7
3. Safety Evaluation

cc w/encls: See next page

March 20, 2001

Mr. David A. Christian
Senior Vice President - Nuclear
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2 - ISSUANCE OF
AMENDMENTS RE: TECHNICAL SPECIFICATIONS CHANGES TO
INCREASE BORON CONCENTRATION LIMITS (TAC NOS. MA9362 AND
MA9363)

Dear Mr. Christian:

The Commission has issued the enclosed Amendment Nos. 225 and 206 to Facility
Operating License Nos. NPF-4 and NPF-7 for the North Anna Power Station, Unit Nos. 1 and 2.
The amendments change the Technical Specifications (TS) in response to your letter dated
June 22, 2000, as supplemented November 15, 2000.

These amendments revise TS 3.1.2.7, TS 3.1.2.8, TS 3.5.1, TS 3.5.5, TS 3.6.2.2, and TS 3.9.1
to increase the boron concentration limits in the refueling water storage tank, casing cooling
tank, safety injection accumulators, and the reactor coolant system during refueling.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the
Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Stephen Monarque, Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-338 and 50-339

Enclosures:

1. Amendment No. 225 to NPF-4
2. Amendment No. 206 to NPF-7
3. Safety Evaluation

cc w/encls: See next page

| | | |
|----------------------|-----------------------------------|------------------------------|
| <u>Distribution:</u> | RidsAcrsAcnwMailCenter | RidsRgn2MailCenter (KLandis) |
| PUBLIC | RidsNrrPMSMonarque (paper copy) | TSullivan |
| PDII-1 Rdg. | RidsNrrLAEDunnington (paper copy) | FAkstulewicz |
| RidsNrrDlpmLpdii | RidsOgcRp | KParczewski |

FILENAME - G:\PDII-1\NOANNA\ma9362-63amendmnt.WPD *See previous concurrence

| OFFICE | PM:PDII/S1 | LA:PDII/S2 | OGC | SC:PDII/S1 | SC:SRXB* |
|--------|--------------|-------------|---------|------------|--------------|
| NAME | SMonarque:cn | EDunnington | APH | MBanerjee | FAkstulewicz |
| DATE | 3/14/01 | 3/6/01 | 3/12/01 | 3/8/01 | 2/22/01 |
| COPY | Yes/No | Yes/No | Yes/No | Yes/No | Yes/No |

OFFICIAL RECORD COPY

Mr. David A. Christian
Virginia Electric and Power Company

North Anna Power Station
Units 1 and 2

cc:

Mr. C. Lee Lintacum
County Administrator
Louisa County
P.O. Box 160
Louisa, Virginia 23093

Mr. W. R. Matthews
Site Vice President
North Anna Power Station
P.O. Box 402
Mineral, Virginia 23117

Mr. Donald P. Irwin, Esquire
Hunton and Williams
Riverfront Plaza, East Tower
951 E. Byrd Street
Richmond, Virginia 23219

Mr. E. S. Grecheck
Site Vice President
Surry Power Station
Virginia Electric and Power Company
5570 Hog Island Road
Surry, Virginia 23883

Dr. W. T. Lough
Virginia State Corporation
Commission
Division of Energy Regulation
P.O. Box 1197
Richmond, Virginia 23209

Robert B. Strobe, M.D., M.P.H.
State Health Commissioner
Office of the Commissioner
Virginia Department of Health
P. O. Box 2448
Richmond, Virginia 23218

Old Dominion Electric Cooperative
4201 Dominion Blvd.
Glen Allen, Virginia 23060

Mr. J. H. McCarthy, Manager
Nuclear Licensing & Operations Support
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, Virginia 23060

Office of the Attorney General
Commonwealth of Virginia
900 East Main Street
Richmond, Virginia 23219

Senior Resident Inspector
North Anna Power Station
U.S. Nuclear Regulatory Commission
1024 Haley Drive
Mineral, Virginia 23117



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-338

NORTH ANNA POWER STATION, UNITS NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 225
License No. NPF-4

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company et al., (the licensee) dated June 22, 2000, as supplemented November 15, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

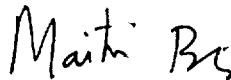
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.D.(2) of Facility Operating License No. NPF-4 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 225, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented at the end of the Fall 2001 refueling outage.

FOR THE NUCLEAR REGULATORY COMMISSION



Maitri Banerjee, Chief, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachments:
Changes to the Technical
Specifications

Date of Issuance: March 20, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 225

TO FACILITY OPERATING LICENSE NO. NPF-4

DOCKET NO. 50-338

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages as indicated. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

Remove Pages

3/4 1-15

3/4 1-16

3/4 5-1

3/4 5-9

3/4 6-12

3/4 9-1

B 3/4 1-3

B 3/4 9-1

Insert Pages

3/4 1-15

3/4 1-16

3/4 5-1

3/4 5-9

3/4 6-12

3/4 9-1

B 3/4 1-3

B 3/4 9-1

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES – SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.7 As a minimum, one of the following borated water sources shall be OPERABLE:

- a. A boric acid storage system and associated heat tracing with:
 - 1. A minimum contained borated water volume of 1378 gallons,
 - 2. Between 12,950 and 15,750 ppm of boron, and
 - 3. A minimum solution temperature of 115°F.
- b. The refueling water storage tank with:
 - 1. A minimum contained borated water volume of 51,000 gallons,
 - 2. Between 2600 and 2800 ppm of boron, and
 - 3. A minimum solution temperature of 35°F.

APPLICABILITY: MODES 5 and 6.

ACTION:

With no borated water source OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes until at least one borated water source is restored to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.1.2.7 The above required borated water source shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 - 1. Verifying the boron concentration of the water,
 - 2. Verifying the contained borated water volume of the tank, and
 - 3. Verifying the boric acid storage tank solution temperature when it is the source of borated water.
- b. At least once per 24 hours by verifying the RWST temperature when it is the source of borated water and the outside air temperature is < 35°F.

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES – OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.8 Each of the following borated water sources shall be OPERABLE:

- a. A boric acid storage system and associated heat tracing with:
 - 1. A contained borated water volume of between 6000 and 16,280 gallons,
 - 2. Between 12,950 and 15,750 ppm of boron, and
 - 3. A minimum solution temperature of 115°F.
- b. The refueling water storage tank with:
 - 1. A contained borated water volume of between 466,200 and 487,000 gallons,
 - 2. Between 2600 and 2800 ppm of boron, and
 - 3. A solution temperature between 40°F and 50°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With the boric acid storage system inoperable, restore the storage system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least 1.77% $\Delta k/k$ at 200°F; restore the boric acid storage system to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.
- b. With the refueling water storage tank inoperable, restore the tank to OPERABLE status within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.8 Each borated water source shall be demonstrated OPERABLE:

3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

ACCUMULATORS

LIMITING CONDITION FOR OPERATION

3.5.1 Each reactor coolant system accumulator shall be OPERABLE with:

- a. The isolation valve open,
- b. A contained borated water volume of between 7580 and 7756 gallons,
- c. Between 2500 and 2800 ppm of boron, and
- d. A nitrogen cover-pressure of between 599 and 667 psig.

APPLICABILITY: MODES 1, 2 and 3*.

ACTION:

- a. With one accumulator inoperable, except as a result of a closed isolation valve, restore the inoperable accumulator to OPERABLE status within one hour or be in HOT SHUTDOWN within the next 12 hours.
- b. With one accumulator inoperable due to the isolation valve being closed, either immediately open the isolation valve or be in HOT STANDBY within one hour and be in HOT SHUTDOWN within the next 12 hours.

SURVEILLANCE REQUIREMENTS

4.5.1 Each accumulator shall be demonstrated OPERABLE:

- a. At least once per 12 hours by:
 1. Verifying the contained borated water volume and nitrogen cover-pressure in the tanks, and
 2. Verifying that each accumulator isolation valve is open.

* Pressurizer Pressure above 1000 psig. Power lock out of valves is not permitted in MODE 3 when below 1000 psig.

EMERGENCY CORE COOLING SYSTEMS

REFUELING WATER STORAGE TANK

LIMITING CONDITION FOR OPERATION

3.5.5 The refueling water storage tank (RWST) shall be OPERABLE with:

- a. A contained borated water volume of between 466,200 and 487,000 gallons,
- b. Between 2600 and 2800 ppm of boron, and
- c. A solution temperature between 40°F and 50°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With the refueling water storage tank inoperable, restore the tank to OPERABLE status within 1 hour or be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.5.5 The RWST shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 1. Verifying the contained borated water volume in the tank, and
 2. Verifying the boron concentration of the water.
- b. At least once per 24 hours by verifying the RWST temperature.

CONTAINMENT SYSTEMS

CONTAINMENT RECIRCULATION SPRAY SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.2 Two trains of containment recirculation spray shall be OPERABLE. Each train shall consist of:

- a.
 1. One inside containment recirculation spray subsystem composed of an inside containment recirculation spray pump, associated heat exchanger and flow path, and
 2. One outside containment recirculation spray subsystem composed of an outside containment recirculation spray pump, associated heat exchanger and flow path, and a casing cooling pump and a flow path capable of transferring fluid from the casing cooling tank to the suction of the outside recirculation spray pump.
- b. One casing cooling tank (shared with both trains) shall be OPERABLE with:
 1. Contained borated water volume of at least 116,500 gallons.
 2. Between 2600 and 2800 ppm boron concentration.
 3. A solution temperature $\geq 35^{\circ}\text{F}$ and $\leq 50^{\circ}\text{F}$.

APPLICABILITY: MODES 1, 2, 3 and 4

ACTION:

- a. With one containment recirculation spray subsystem inoperable in one containment recirculation spray train, restore the inoperable subsystem to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours; restore the inoperable subsystem to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the next 30 hours.
- b. With two containment recirculation spray subsystems inoperable in one containment recirculation spray train, restore one inoperable subsystem to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With the casing cooling tank inoperable, restore the tank to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

3/4.9 REFUELING OPERATIONS

BORON CONCENTRATION

LIMITING CONDITION FOR OPERATION

3.9.1 With the reactor vessel head unbolted or removed, the boron concentration of all filled portions of the Reactor Coolant System and the refueling canal shall be maintained uniform and sufficient to ensure that the more restrictive of the following reactivity conditions is met:

- a. Either a K_{eff} of 0.95 or less, or
- b. A boron concentration of ≥ 2600 ppm.

APPLICABILITY: Mode 6*.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or positive reactivity changes and initiate and continue boration at ≥ 10 gpm of $\geq 12,950$ ppm boric acid solution or its equivalent until K_{eff} is reduced to ≤ 0.95 or the boron concentration is restored to ≥ 2600 ppm, whichever is the more restrictive. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.1.1 The more restrictive of the above two reactivity conditions shall be determined prior to:

- a. Removing or unbolting the reactor vessel head, and
- b. Withdrawal of any full length control rod located within the reactor pressure vessel, in excess of 3 feet from its fully inserted position.

4.9.1.2 The boron concentration of the reactor coolant system and the refueling canal shall be determined by chemical analysis at least once per 72 hours.

* The reactor shall be maintained in MODE 6 when the reactor vessel head is unbolted or removed.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.2 BORATION SYSTEMS (Continued)

With the RCS average temperature above 200°F, a minimum of two separate and redundant boron injection systems are provided to ensure single functional capability in the event an assumed failure renders one of the systems inoperable. Allowable out-of-service periods ensure that minor component repair or corrective action may be completed without undue risk to overall facility safety from injection system failures during the repair period.

The boration capability of either system is sufficient to provide a SHUTDOWN MARGIN from expected operating conditions of 1.77% $\Delta k/k$ after xenon decay and cooldown to 200°F. This expected boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires 6,000 gallons of 12,950 ppm borated water from the boric acid storage tanks or 54,200 gallons of 2600 ppm borated water from the refueling water storage tank.

The limitation for a maximum of one charging pump to be OPERABLE and the Surveillance Requirement to verify all charging pumps except the required OPERABLE pump to be inoperable below 235°F provides assurance that a mass addition pressure transient can be relieved by the operation of a single PORV.

Having more than one charging pump OPERABLE during pump switching operations is allowed. This is acceptable based on pump switching being a momentary action under the direct administrative control of a licensed operator. Rendering a charging pump inoperable for this requirement may be accomplished by methods such as placing the control switch in the pull-to-lock position, tagging of the power supply breaker, or closing of the pump discharge valve. If the pump discharge valve is used to render a pump inoperable during solid water operation, the valve will be deenergized and tagged in the closed position.

With the RCS temperature below 200°F, one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATION and positive reactivity change in the event the single injection system becomes inoperable.

The boron capability required below 200°F is sufficient to provide a SHUTDOWN MARGIN of 1.77% $\Delta k/k$ after xenon decay and cooldown from 200°F to 140°F. This condition requires either 1378 gallons of 12,950 ppm borated water from the boric acid storage tanks or 3400 gallons of 2600 ppm borated water from the refueling water storage tank.

The contained water volume limits include allowance for water not available because of discharge line location and other physical characteristics. The OPERABILITY of one boron injection system during REFUELING insures that this system is available for reactivity control while in MODE 6.

3/4.9 REFUELING OPERATIONS

BASES

3/4.9.1 BORON CONCENTRATION

The limitations on reactivity conditions during REFUELING ensure that: 1) the reactor will remain subcritical during CORE ALTERATIONS, and 2) a uniform boron concentration is maintained for reactivity control in the water volume having direct access to the reactor vessel. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the accident analyses. The value of 0.95 or less for K_{eff} includes a 1% $\Delta k/k$ conservative allowance for uncertainties. Similarly, the boron concentration of 2600 ppm or greater includes a conservative uncertainty allowance of 50 ppm boron.

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the source range neutron flux monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

3/4.9.3 DECAY TIME

The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor pressure vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the accident analyses.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The requirements on containment building penetration closure and OPERABILITY ensure that a release of radioactive material within containment will be restricted from leakage to the environment. The OPERABILITY and closure restrictions are sufficient to restrict radioactive materials release from a fuel element rupture based upon a lack of containment pressurization potential while in the REFUELING MODE.

OPERABILITY of the containment airlock door requires that the door is capable of being closed, that the door is unblocked and no cables or hoses are being run through the airlock, and that a designated individual is continuously available to close the airlock door. This individual must be stationed near the airlock.

3/4.9.5 COMMUNICATIONS

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-339

NORTH ANNA POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 206
License No. NPF-7

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company et al., (the licensee) dated June 22, 2000, as supplemented November 15, 2000 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-7 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 206, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented at the end of the Fall 2002 refueling outage.

FOR THE NUCLEAR REGULATORY COMMISSION

Maitri Banerjee

Maitri Banerjee, Chief, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachments:
Changes to the Technical
Specifications

Date of Issuance: March 20, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 206

TO FACILITY OPERATING LICENSE NO. NPF-7

DOCKET NO. 50-339

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages as indicated. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

| <u>Remove Pages</u> | <u>Insert Pages</u> |
|---------------------|---------------------|
| 3/4 1-13 | 3/4 1-13 |
| 3/4 1-14 | 3/4 1-14 |
| 3/4 5-1 | 3/4 5-1 |
| 3/4 5-10 | 3/4 5-10 |
| 3/4 6-11 | 3/4 6-11 |
| 3/4 9-1 | 3/4 9-1 |
| B 3/4 1-3 | B 3/4 1-3 |
| B 3/4 9-1 | B 3/4 9-1 |

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES – SHUTDOWN

LIMITING CONDITION FOR OPERATION

- 3.1.2.7 As a minimum, one of the following borated water sources shall be OPERABLE:
- a. A boric acid storage system and at least one associated heat tracing system with:
 - 1. A minimum contained borated water volume of 1378 gallons,
 - 2. Between 12,950 and 15,750 ppm of boron, and
 - 3. A minimum solution temperature of 115°F.
 - b. The refueling water storage tank with:
 - 1. A minimum contained borated water volume of 51,000 gallons,
 - 2. Between 2600 and 2800 ppm of boron, and
 - 3. A minimum solution temperature of 35°F.

APPLICABILITY: MODES 5 and 6.

ACTION:

With no borated water source OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes until at least one borated water source is restored to OPERABLE status.

SURVEILLANCE REQUIREMENTS

- 4.1.2.7 The above required borated water source shall be demonstrated OPERABLE:
- a. At least once per 7 days by:
 - 1. Verifying the boron concentration of the water,
 - 2. Verifying the contained borated water volume of the tank, and
 - 3. Verifying the boric acid storage tank solution temperature when it is the source of borated water.
 - b. At least once per 24 hours by verifying the RWST temperature when it is the source of borated water and the outside air temperature is less than 35°F.

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES – OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.8 As a minimum, the following borated water source(s) shall be OPERABLE as required by Specification 3.1.2.2:

- a. A boric acid storage system and at least one associated heat tracing system with:
 1. A contained borated water volume of between 6000 and 16,280 gallons,
 2. Between 12,950 and 15,750 ppm of boron, and
 3. A minimum solution temperature of 115°F.
- b. The refueling water storage tank with:
 1. A contained borated water volume of between 466,200 and 487,000 gallons,
 2. Between 2600 and 2800 ppm of boron, and
 3. A solution temperature between 40°F and 50°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With the boric acid storage system inoperable and being used as one of the above required borated water sources, restore the storage system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least 1.77% $\Delta k/k$ at 200°F; restore the boric acid storage system to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.
- b. With the refueling water storage tank inoperable, restore the tank to OPERABLE status within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

ACCUMULATORS

LIMITING CONDITION FOR OPERATION

3.5.1 Each reactor coolant system accumulator shall be OPERABLE with:

- a. The isolation valve open,
- b. A contained borated water volume of between 7580 and 7756 gallons,
- c. Between 2500 and 2800 ppm of boron, and
- d. A nitrogen cover-pressure of between 599 and 667 psig.

APPLICABILITY: MODES 1, 2 and 3*.

ACTION:

- a. With one accumulator inoperable, except as a result of a closed isolation valve, restore the inoperable accumulator to OPERABLE status within one hour or be in HOT SHUTDOWN within the next 12 hours.
- b. With one accumulator inoperable due to the isolation valve being closed, either immediately open the isolation valve or be in HOT STANDBY within one hour and be in HOT SHUTDOWN within the next 12 hours.

SURVEILLANCE REQUIREMENTS

4.5.1.1 Each accumulator shall be demonstrated OPERABLE:

- a. At least once per 12 hours by:
 1. Verifying the contained borated water volume and nitrogen cover-pressure in the tanks, and
 2. Verifying that each accumulator isolation valve is open.

* Pressurizer Pressure above 1000 psig. Power lock out of valves is not permitted in MODE 3 when below 1000 psig.

EMERGENCY CORE COOLING SYSTEMS

REFUELING WATER STORAGE TANK

LIMITING CONDITION FOR OPERATION

3.5.5 The refueling water storage tank (RWST) shall be OPERABLE with:

- a. A contained borated water volume of between 466,200 and 487,000 gallons.
- b. Between 2600 and 2800 ppm of boron, and
- c. A solution temperature between 40°F and 50°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With the refueling water storage tank inoperable, restore the tank to OPERABLE status within 1 hour or be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.5.5 The RWST shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 1. Verifying the contained borated water volume in the tank, and
 2. Verifying the boron concentration of the water.
- b. At least once per 24 hours by verifying the RWST temperature.

CONTAINMENT SYSTEMS

CONTAINMENT RECIRCULATION SPRAY SYSTEM

LIMITING CONDITION FOR OPERATION

- 3.6.2.2 Two trains of containment recirculation spray shall be OPERABLE. Each train shall consist of:
- a.
 1. One inside containment recirculation spray subsystem composed of an inside containment recirculation spray pump, associated heat exchanger and flow path, and
 2. One outside containment recirculation spray subsystem composed of an outside containment recirculation spray pump, associated heat exchanger and flow path, and a casing cooling pump and a flow path capable of transferring fluid from the casing cooling tank to the suction of the outside recirculation spray pump.
 - b. One casing cooling tank (shared with both trains) shall be OPERABLE with:
 1. Contained borated water volume of at least 116,500 gallons.
 2. Between 2600 and 2800 ppm boron concentration.
 3. A solution temperature $\geq 35^{\circ}\text{F}$ and $\leq 50^{\circ}\text{F}$.

APPLICABILITY: MODES 1, 2, 3 and 4

ACTION:

- a. With one containment recirculation spray subsystem inoperable in one containment recirculation spray train, restore the inoperable subsystem to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours; restore the inoperable subsystem to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the next 30 hours.
- b. With two containment recirculation spray subsystems inoperable in one containment recirculation spray train, restore one inoperable subsystem to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With the casing cooling tank inoperable, restore the tank to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.2.1 Each containment recirculation spray subsystem and casing cooling subsystem shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed or otherwise secured in position, is in its correct position.

3/4.9 REFUELING OPERATIONS

BORON CONCENTRATION

LIMITING CONDITION FOR OPERATION

3.9.1 With the reactor vessel head unbolted or removed, the boron concentration of all filled portions of the Reactor Coolant System and the refueling canal shall be maintained uniform and sufficient to ensure that the more restrictive of the following reactivity conditions is met:

- a. Either a K_{eff} of 0.95 or less, or
- b. A boron concentration of ≥ 2600 ppm

APPLICABILITY: Mode 6*

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or positive reactivity changes and initiate and continue boration at ≥ 10 gpm of $\geq 12,950$ ppm boric acid solution or its equivalent until K_{eff} is reduced to ≤ 0.95 or the boron concentration is restored to ≥ 2600 ppm, whichever is the more restrictive. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.1.1 The more restrictive of the above two reactivity conditions shall be determined prior to:

- a. Removing or unbolting the reactor vessel head, and
- b. Withdrawal of any full length control rod located within the reactor pressure vessel, in excess of 3 feet from its fully inserted position.

4.9.1.2 The boron concentration of the reactor coolant system and the refueling canal shall be determined by chemical analysis at least once per 72 hours.

* The reactor shall be maintained in MODE 6 when the reactor vessel head is unbolted or removed.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.2 BORATION SYSTEMS

The boron injection system ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include 1) borated water sources, 2) charging pumps, 3) separate flow paths, 4) boric acid transfer pumps, 5) associated heat tracing systems, and 6) an emergency power supply from OPERABLE emergency diesel generators.

With the RCS average temperature above 200°F, a minimum of two boron injection flow paths are required to ensure single functional capability in the event an assumed failure renders one of the flow paths inoperable. The boration capability of either flow path is sufficient to provide a SHUTDOWN MARGIN from expected operation conditions of 1.77% delta k/k after xenon decay and cooldown to 200°F. The maximum expected boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires 6000 gallons of 12,950 ppm borated water from the boric acid storage tanks or 54,200 gallons of 2600 ppm borated water from the refueling water storage tank.

With the RCS temperature below 200°F, one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity change in the event the single injection system becomes inoperable.

The limitation for a maximum of one charging pump to be OPERABLE and the Surveillance Requirement to verify all charging pumps except the required OPERABLE pump to be inoperable below 270°F provides assurance that a mass addition pressure transient can be relieved by the operation of a single PORV.

Having more than one charging pump OPERABLE during pump switching operations is allowed. This is acceptable based on pump switching being a momentary action under the direct administrative control of a licensed operator. Rendering a charging pump inoperable for this requirement may be accomplished by methods such as placing the control switch in the pull-to-lock position, tagging of the power supply breaker, or closing of the pump discharge valve. If the pump discharge valve is used to render a pump inoperable during solid water operation, the valve will be deenergized and tagged in the closed position.

The boron capability required below 200°F is sufficient to provide a SHUTDOWN MARGIN of 1.77% delta k/k after xenon decay and cooldown from 200°F to 140°F. This condition requires either 1378 gallons of 12,950 ppm borated water from the boric acid storage tanks or 3400 gallons of 2600 ppm borated water from the refueling water storage tank.

3/4.9 REFUELING OPERATIONS

BASES

3/4.9.1 BORON CONCENTRATION

The limitations on reactivity conditions during REFUELING ensure that: 1) the reactor will remain subcritical during CORE ALTERATIONS, and 2) a uniform boron concentration is maintained for reactivity control in the water volume having direct access to the reactor vessel. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the accident analyses. The value of 0.95 or less for K_{eff} includes a 1% $\Delta k/k$ conservative allowance for uncertainties. Similarly, the boron concentration of 2600 ppm or greater includes a conservative uncertainty allowance of 50 ppm boron.

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the source range neutron flux monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

3/4.9.3 DECAY TIME

The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor pressure vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the accident analyses.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The requirements on containment building penetration closure and OPERABILITY ensure that a release of radioactive material within containment will be restricted from leakage to the environment. The OPERABILITY and closure restrictions are sufficient to restrict radioactive materials release from a fuel element rupture based upon a lack of containment pressurization potential while in the REFUELING MODE.

OPERABILITY of the containment airlock door requires that the door is capable of being closed, that the door is unblocked and no cables or hoses are being run through the airlock, and that a designated individual is continuously available to close the airlock door. This individual must be stationed near the airlock.

3/4.9.5 COMMUNICATIONS

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 225 TO FACILITY OPERATING LICENSE NO. NPF-4
AND AMENDMENT NO. 206 TO FACILITY OPERATING LICENSE NO. NPF-7

VIRGINIA ELECTRIC AND POWER COMPANY

NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-338 AND 50-339

1.0 INTRODUCTION

By letter dated June 22, 2000, as supplemented November 15, 2000, Virginia Electric and Power Company (VEPCO) requested license amendments to Operating Licenses NPF-4 and NPF-7 for North Anna Power Station (NAPS), Units 1 and 2. The November 15, 2000, supplement contained clarifying information only, and did not change the initial no significant hazards consideration determination.

The proposed Technical Specification (TS) changes would increase the boron concentration limits in the refueling water storage tank (RWST), casing cooling tank (CCT), safety injection accumulators (SIAs), and the reactor coolant system (RCS) during refueling. VEPCO had requested the following TS revisions to accomplish this change. TS Sections 3.1.2.7, 3.1.2.8, and 3.5.5 were to be revised to increase the RWST boron concentration limits from 2300 to 2400 parts per million (ppm) to 2600 to 2800 ppm. Changes in TS Sections 3.5.1 and 3.6.2.2 were requested to increase the boron concentration in the SIAs from 2200 to 2400 ppm to 2500 to 2800 ppm, and in the CCT from 2300 to 2400 ppm to 2600 to 2800 ppm. Finally, VEPCO proposed a change to TS Section 3.9.1 to increase the boron concentration in the RCS during refueling from ≥ 2300 ppm to ≥ 2600 ppm.

VEPCO had requested these amendments to reduce the end-of-cycle coastdown by increasing the initial core reactivity associated with future core design, thus requiring a higher boron concentration than what is currently allowed in the TS. Increasing the difference between the upper and lower limits from 100 ppm to 200 ppm or for 200 ppm to 300 ppm will provide additional operational flexibility.

2.0 EVALUATION

VEPCO's June 22, 2000, submittal evaluated the effect of increased boron concentrations in the RWST, SIA, and the RCS during refueling on all non-LOCA transients presented in Chapter 15 of the Updated Final Safety Analysis Report (UFSAR). LOCA evaluations included the post-LOCA recirculation mode switchover time interval, the post-LOCA sump boron concentration limit, and the post-LOCA containment sump and Quench Spray PH analysis. The RWST and

boric acid storage tank (BAST) volume requirements, boron solubility, and equipment qualification were also evaluated as part of this submittal.

Of the non-LOCA transients, only the boron dilution event at startup and at power operation are potentially impacted by the proposed increased RWST boron concentration. The increased critical boron concentrations resulting from the proposed increased boron concentrations can result in higher reactivity insertion rates during these boron dilution events. As indicated in their June 22, 2000 submittal, VEPCO evaluated the effects of the accident analyses due to higher boron concentrations as part of "Reload Nuclear Design Methodology VEP-FRD-42, Revision 1-A," September 1986, and supplemented by letter from M. L. Bowling to NRC, Serial No. 93-723, dated December 3, 1993. This ensured that TS shutdown margin requirements were adequate to ensure that at least 15 minutes are available for corrective operator action between positive indication of a dilution in progress and complete loss of shutdown margin as indicated in Section 15.2.4.2.2 of the UFSAR. The boron dilution events during refueling, cold shutdown, and hot standby conditions are precluded by administrative lock-out of the primary grade water flow path in accordance with North Anna Units 1 and 2, TS 3.1.1.3.2.

The "North Anna Power Station 10 CFR 50.59 Station Evaluation, Revised Large and Small Break LOCA Analyses, North Anna Power Station, Units 1 and 2, 95-SE-OT-35," dated October 18, 1995, shows that the peak cladding temperature (PCT) is reached prior to the time the boron becomes significant in maintaining core shutdown. Therefore, boron concentrations are not modeled in PCT cases. The proposed increased RWST and SIA boron concentrations would, therefore, have no effect on the calculated PCT results for the large break LOCA (LBLOCA) and would, in fact, provide a benefit if accounted for in the analysis. The small break LOCA model assumes the insertion of control rods in the calculation of core shutdown. Consequently, the boron concentration required to achieve the level of negative reactivity necessary to assure shutdown is significantly lower than the concentration required to assure shutdown for a LBLOCA.

One effect of boration during a LOCA is the progressive increase over time of the boron concentration in the core. This occurs because the water vaporizes out of the break and leaves behind the boron it originally contained. If the concentration exceeds a critical value, boric acid can crystallize in the core and precipitate out of solution. The concern is that the precipitation of boric acid crystals could block core cooling. As indicated in their June 22, 2000 submittal, VEPCO has committed to implementation of a revised cold-to-hot leg switchover time based on the increased boron concentrations in the North Anna emergency operating procedures to ensure simultaneous cold leg and reactor vessel injection. To address a safety concern regarding the possibility of inadvertent re-criticality, following switchover from cold leg to hot leg safety injection, discussed in Westinghouse Nuclear Safety Advisory Letter 90-016, VEPCO, in their June 22, 2000 submittal, implemented a reload safety analysis checklist parameter to ensure the sump boron concentration is maintained subcritical at the time of the cold to hot leg recirculation switchover.

The proposed TS change to the minimum boron concentration of the primary coolant system for refueling operations has been evaluated and found to preserve the 5-percent subcriticality margin and provide the necessary response time for postulated boron dilution events. A boron dilution at refueling (Mode 6), cold shutdown (Mode 5), hot shutdown (Mode 4), and hot standby (Mode 3) is precluded by administrative lock-out of the primary-grade water flow path in accordance with TS 3.1.1.3.2. Therefore, the boron dilution at startup (Mode 2) and power

operation (Mode 1) are the only dilution events potentially impacted by the proposed RWST boron concentration increase. As required by Section 15.2.4.2.2 of the UFSAR, the reload evaluations of the boron dilution event at startup and at power ensure that at least 15 minutes are available for corrective operator action between positive indication of a dilution in progress and complete loss of shutdown margin. The proposed change in the refueling boron concentration from 2300 ppm to 2600 ppm will continue to ensure that adequate operator response time remains available during this dilution event. The staff finds the proposed TS changes are acceptable.

2.1 Other Changes

VEPCO found that increasing boron concentration limits in the RWST, SIAs, and CCT, and the minimum boron concentration required in the RCS and the refueling canal during refueling, will not cause solubility problems because the highest concentration of boric acid in the plant corresponding to 2800 ppm of boron will have a saturation temperature lower than 32°F, which is well below the temperature to which the boric acid-carrying system in the plant is exposed. Increased boron concentration will also have an impact on the post-LOCA pH in the containment sump and the quench spray. In order to prevent post-LOCA iodine re-evolution and corrosion of metals, this pH will be maintained basic by the addition of sodium hydroxide, as increased boron concentration will lower this pH. In their June 22, 2000 submittal, VEPCO analyzed the pH effect and calculated the post-LOCA containment sump pH to be between 7.0 and 9.5. This pH range complies with Section 6.1.1 of NUREG-0800, Revision 2, "USNRC Standard Review Plan," dated July 1981. This same submittal calculated the quench spray pH to be between 8.5 and 10.5. This range complies with Section 6.5.2 of NUREG-0800, Revision 1, dated July 1981. The staff has reviewed VEPCO's analysis and finds their proposed TS changes acceptable.

2.2 Staff Assessment

The staff has reviewed the effects of the proposed increased boron concentration limits on the LOCA and non-LOCA safety analyses and, based upon the licensee's evaluations, concludes that all pertinent safety criteria have been met. The staff has confirmed with VEPCO that the positive value of the moderator temperature coefficient used in the safety analyses remains bounding. Prior to operating with a revised core configuration, the effects on the accident analyses of the higher boron concentrations will be explicitly evaluated by VEPCO during the reload safety evaluation process. On the basis of its evaluation, the staff concludes that VEPCO's proposal to increase the boron concentration will have insignificant impact on the plant performance and is, therefore, acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Virginia State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve no significant increase in the amounts, and no

significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (65 FR 46018). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: L. Kopp
K. Parczewski

Date: March 20, 2001