

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

October 16, 2019

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Serial No. 19-431  
NAPS/RAP R0  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION ENERGY VIRGINIA)**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**ANNUAL SUBMITTAL OF TECHNICAL SPECIFICATION BASES CHANGES**  
**PURSUANT TO TECHNICAL SPECIFICATION 5.5.13.d**

Pursuant to Technical Specification 5.5.13.d, "Technical Specifications (TS) Bases Control Program," Dominion Energy Virginia hereby submits changes to the Bases of the Technical Specifications implemented during the period of October 1, 2018 through September 30, 2019. A summary of these TS Bases changes is provided in the Attachment to this letter. Enclosed is an electronic copy (CD) of the entire TS Bases through Revision 65 for your information.

Bases changes to the Technical Specifications that were submitted to the NRC for information with their associated License Amendment Request (LAR) transmittals, submitted pursuant to 10 CFR 50.90, were reviewed and approved with the LAR by the Facility Safety Review Committee. These TS Bases changes have been implemented with the respective approved License Amendments. A summary of these TS Bases changes associated with License Amendments is also provided in the Attachment to this letter.

If you have any questions regarding this submittal, please contact Mr. Neil S. Turner at (540) 894-2100.

Sincerely,



J. H. Jenkins  
Director, Nuclear Safety and Licensing

ADD1  
NRR

Attachment: Summary of TS Bases Changes Associated with License Amendments

Enclosure: CD of Current TS Bases (Revision 65)

Commitments made in this letter: None

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North Anna Power Station

**ATTACHMENT**

**SUMMARY OF TS BASES CHANGES**

**VIRGINIA ELECTRIC AND POWER COMPANY  
(DOMINION ENERGY VIRGINIA)  
NORTH ANNA POWER STATION UNITS 1 AND 2**

## **TS BASES CHANGES ASSOCIATED WITH LICENSE AMENDMENTS**

### **Spent Fuel Pool Storage and Criticality**

Technical Specification (TS) 3.7.18, Spent Fuel Pool Storage, and TS 4.3.1, Criticality, were modified to allow the storage of fuel assemblies with a maximum enrichment of up to 5.0 weight percent uranium 235 in the North Anna Power Station (NAPS) spent fuel pool storage racks and the New Fuel Storage Area. These amendments further revise the allowable fuel assembly parameters and fuel storage patterns in the spent fuel pool. The Bases for TS 3.7.18 were modified to address the above changes.

The Bases changes noted above were submitted to the NRC by Dominion submittal dated May 2, 2017 and incorporated into the Bases for North Anna Units 1 and 2 on November 30, 2018 upon NRC approval and implementation of the associated Technical Specification changes (Amendment 279 for Unit 1 and Amendment 262 for Unit 2 issued on July 27, 2018).

### **TSTF-522, Revision 0**

TS 3.7.10, Main Control Room/Emergency Switchgear Room (MCR/ESGR) Emergency Ventilation System (EVS), and TS 3.7.12, Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System (PREACS), were modified to adopt the Technical Specification Task Force Traveler TSTF-522 Revision 0, Revise Ventilation System Surveillance Requirements to Operate for 10 hours per month. These amendments further modify TS 5.5.10, Ventilation Filter Testing Program (VFTP), to remove the electric heater output test and to increase the specified relative humidity (RH) for the charcoal testing for the MCR/ESGR EVS from the 70 percent to 95 percent RH. The Bases for TS 3.7.10 and 3.7.12 were modified to address the above changes.

The Bases changes noted above were submitted to the NRC by Dominion submittal dated January 22, 2018 and incorporated into the Bases for North Anna Units 1 and 2 on January 24, 2019 upon NRC approval and implementation of the associated Technical Specification changes (Amendment 280 for Unit 1 and Amendment 263 for Unit 2 issued on November 27, 2018).

### **Loss of Power Emergency Diesel Generator Start Instrumentation**

TS 3.3.5, Loss of Power (LOP) Emergency Diesel Generator (EDG) Start Instrumentation, was modified to incorporate voltage unbalance operability requirements, required actions, and surveillance requirements in response to NRC Bulletin 2012-01, Design Vulnerability in Electrical Power System. The Bases for TS 3.3.5, 3.8.1, AC Sources – Operating, and 3.8.2, AC Sources – Shutdown, were modified to address the above changes.

The Bases changes noted above were submitted to the NRC by Dominion submittal dated April 30, 2018 and incorporated into the Bases for North Anna Units 1 and 2 on September 16, 2019 upon NRC approval and implementation of the associated Technical Specification changes (Amendment 282 for Unit 1 and Amendment 265 for Unit 2 issued on September 13, 2019).

### **TS BASES CHANGES NOT ASSOCIATED WITH LICENSE AMENDMENTS**

#### **TS Bases 3.4.15, Title of Bases**

The purpose of this TS Bases change was to add information about Train "B" sump in-leakage calculation input. Previously only Train "A" was mentioned. The following sentences were added: The containment sump collects unidentified LEAKAGE. Two level instruments in the containment sump provide level indication. The "A" train sump level transmitter provides input to the Plant Computer System, which calculates containment sump inleakage. The "B" train sump level transmitter provides input to a level recorder in the control room. Containment sump inleakage can be manually calculated using change in level and time taken from the recorder. Either computer calculated or manually calculated containment sump inleakage is acceptable for detecting increases in unidentified leakage.

#### **TS Bases 3.8.1, Title of Bases**

The purpose of this TS Bases change was incorporate reference to STI-N12-2017-003. Additionally, the following statement was added to the bases: Per STI-N12-2017-003 (Ref. 14), exception has been taken to the surveillance frequencies in Regulatory Guide 1.9. STI-N12-2017-003 was used to change the testing frequency of the NAPS EDGs in accordance with the Surveillance Frequency Control Program.