

**Attachment 2**

**Technical Specifications Changes**

## CONTAINMENT SYSTEMS

### CONTAINMENT RECIRCULATION SPRAY SYSTEM

#### LIMITING CONDITION FOR OPERATION

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- 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 2300 and 2400 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.

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  - b. One casing cooling tank (shared with both trains) shall be OPERABLE with:
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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.

**Attachment 3**  
**Significant Hazards Consideration**

## SIGNIFICANT HAZARDS CONSIDERATION

Technical Specification (TS) 3.6.2.2 describes the various subsystems that are included in the Containment Recirculation Spray System and the actions required if these subsystems become inoperable. The Containment Recirculation Spray System is used to reduce and maintain containment pressure below atmospheric pressure following a high energy line break. The current description of the Containment Recirculation Spray System in Technical Specifications describes the system as consisting of six separate and independent subsystems and a casing cooling tank. If more than one of the six subsystems becomes inoperable, then within one hour the inoperable subsystems are required to be restored or the unit must be shut down. This could result in unnecessary plant shutdowns even though the units are still within the design parameters of the accident analysis bases.

The current Technical Specifications do not accurately reflect the terminology used in the Updated Final Safety Analysis Report (UFSAR) or the Containment Recirculation Spray System Design Basis Document (SDBD). The Technical Specification changes will separate the containment recirculation spray subsystems into two containment recirculation spray trains. Each train will consist of one inside recirculation spray subsystem and one outside recirculation spray subsystem (which includes its associated casing cooling pump). This change will more accurately describe the Containment Recirculation Spray System as it is addressed in the UFSAR and the Containment Recirculation Spray System SDBD. These Technical Specification changes are also consistent with the accident analysis bases.

Virginia Electric and Power Company has reviewed the Technical Specification changes against the criteria of 10 CFR 50.92 and has concluded that the changes as proposed do not pose a significant hazards consideration. Specifically, operation of North Anna Power Station in accordance with the Technical Specification changes will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated in the UFSAR. The changes would divide the four subsystems of the Containment Recirculation Spray System into two independent trains and add new ACTION statements for each Unit that addresses the inoperability of one or more recirculation spray subsystems while the current ACTION statement only addresses the inoperability of one subsystem. These Technical Specification changes are consistent with the way the UFSAR addresses the Containment Recirculation Spray System. The changes do not involve a modification to plant equipment nor do they affect the manner by which the facility is operated. Therefore, there is no change to the probability or consequences of any accident.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated. The changes do not affect the manner by which the facility is operated or involve a change to equipment or features which affect the operational characteristics of the facility. The proposed changes merely add additional restrictions with regard to the time the facility can be operated with more than one recirculation spray subsystem inoperable. These Technical Specification changes are consistent with the accident analysis bases.
3. Involve a significant reduction in a margin to safety. The proposed changes do not affect the manner by which the facility is operated or involve a change to equipment or features which affect the operational characteristics of the facility. These Technical Specification changes are consistent with the UFSAR, the

accident analysis bases and the Containment Recirculation Spray System SDBD.

Virginia Electric and Power Company concludes that the activities associated with these proposed TS changes satisfy the no significant hazards consideration criteria of 10 CFR 50.92 and, accordingly, a no significant hazards consideration finding is justified.