

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 8, 1993

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

Serial No. 93-617
NL&P/EJW
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 and 2
PROPOSED TECHNICAL SPECIFICATIONS CHANGES
REMOVAL OF COMPONENT LISTS IN ACCORDANCE WITH NRC
GENERIC LETTER 91-08

Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications, to Facility Operating License Nos. NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively. The proposed changes will correct minor administrative errors and will remove certain tables that list plant components, and references thereto, from the North Anna Unit 1 and Unit 2 Technical Specifications. The component lists to be removed include Unit 1 and 2 containment isolation valves, Unit 2 containment penetration conductor overcurrent protective devices, Unit 2 motor-operated valves thermal overload protection and/or bypass devices, and Unit 2 normally de-energized power circuits. These component lists will be incorporated into plant procedures which are subject to the change control provisions of the Administrative Controls Section of the Technical Specifications. These changes would permit administrative control of changes to these lists without processing a license amendment as recommended in Generic Letter 91-08, "Removal of Component Lists from Technical Specifications."

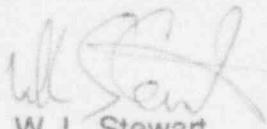
A discussion of the proposed Technical Specifications changes is provided in Attachment 1. The proposed Technical Specifications changes are provided in Attachment 2. It has been determined that the proposed Technical Specifications changes do not involve an unreviewed safety question as defined in 10 CFR 50.59 or a significant hazards consideration as defined in 10 CFR 50.92. The basis for our determination that these changes do not involve a significant hazards consideration is provided in Attachment 3. The proposed Technical Specifications changes have been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee.

9310150251 931008
PDR ADDCK 05000338
P PDR

A001
11

Should you have any questions or require additional information, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachments

cc. U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

Mr. R. D. McWhorter
NRC Senior Resident Inspector
North Anna Power Station

Commissioner
Department of Health
Room 400
109 Governor Street
Richmond, Virginia 23219

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by W. L. Stewart who is Senior Vice President - Nuclear, of Virginia Electric and Power Company. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 8TH day of October, 1993.

My Commission Expires: May 31, 1994.

Vicki L. Hull
Notary Public

(SEAL)

Attachment 1
Discussion of Changes

Discussion of Changes

Introduction

This proposed technical specification change request will delete tables listing certain components from North Anna Unit 1 and Unit 2 Technical Specifications and relocate these lists to plant procedures in accordance with the guidance provided in the Nuclear Regulatory Commission (NRC) Generic Letter 91-08. The lists affected by this technical specification change request include Unit 1 and Unit 2 Containment Isolation Valves (Table 3.6-1), Unit 2 Containment Penetration Conductor Overcurrent Protective Devices (Table 3.8-1), Unit 2 Motor-Operated Valves Thermal Overload Protection and/or Bypass Devices (Table 3.8-2), and Unit 2 Normally De-energized Power Circuits (Table 3.8-3). By relocating these lists to plant procedures, any identified discrepancies can be updated in a timely manner without prior NRC approval. The Limiting Conditions for Operation (LCO), the Action Statements, and the Surveillance Requirements would still apply to all the components in these lists.

Also included in this proposed technical specification change request are administrative changes which are made to enhance the accuracy and clarity of the North Anna Units 1 and 2 Technical Specifications.

Background

NRC Generic Letter 91-08, dated May 6, 1991, introduced an alternative to identifying every component by its plant identification number as it is currently listed in the tables of technical specification components. Generic Letter 91-08 provided the guidance and recommended wording for incorporation of technical specification component lists into plant procedures that are subject to the change control provisions for plant procedures in the administrative controls section of the technical specifications. By relocating the component lists associated with this technical specification change request into plant procedures, the administrative change control provisions of the technical specifications provide an adequate means to control future changes to these lists. This can be accomplished without the requirement for a change to the technical specifications, as is required to update component lists in technical specification tables. Relocation of component lists affected by this technical specification change from the technical specifications to plant procedures will not alter the existing technical specification LCOs, Action Statements, or Surveillance Requirements for those components.

The background for this technical specification change request is as follows:

Technical Specification Index Page IX (Unit 1) and VIII (Unit 2) 3/4.8.2 "ONSITE POWER DISTRIBUTION SYSTEMS" are revised to reflect Technical Specification Amendment #155 for Unit 1 and #137 for Unit 2. These amendments were issued on April 21, 1992 and revised the A.C. and D.C. Distribution Technical Specification requirements. The index was not changed due to an oversight.

Technical Specification Index Page IX for Unit 1 and Unit 2 3/4.9.8 "RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION" are revised to reflect Technical Specification Amendment #137 for Unit 1 and #120 for Unit 2. These amendments were issued on August 27, 1990 and revised the Residual Heat Removal and Coolant Circulation Technical Specification requirements. The index was not changed due to an oversight.

Technical Specification Index Page IX for Unit 1 and Unit 2 3/4.9.10 "WATER LEVEL - REACTOR VESSEL" are revised to reflect Technical Specification Amendment #115 for Unit 1 and #98 for Unit 2. These amendments were issued on February 15, 1989 and revised the Reactor Vessel water level Technical Specification requirements. The index was not changed due to an oversight.

Technical Specification Index Page VIII 3/4.8.2 "ONSITE POWER DISTRIBUTION SYSTEMS" for Unit 2 is revised to reflect the actual plant configuration. The motor operated valves listed in Technical Specification 3.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" do not have and are not required to have bypass devices installed.

Technical Specification Definitions for "CONTAINMENT INTEGRITY" for Unit 1 and Unit 2 are revised in accordance with NRC Generic Letter 91-08. Specifically, the reference to valves listed in Table 3.6-1 of Specification 3.6.3.1 is replaced with the phrase "for valves that are open under administrative control as permitted by Specification 3.6.3.1."

Technical Specification Surveillance Requirement 4.6.1.1.a "CONTAINMENT INTEGRITY" for Unit 1 and Unit 2 are revised in accordance with NRC Generic Letter 91-08. Specifically, the reference to valves listed in Table 3.6-1 of Specification 3.6.3.1 is replaced with the phrase "for valves that are open under administrative control as permitted by Specification 3.6.3.1."

Technical Specification 3.6.3.1 "CONTAINMENT ISOLATION VALVES" for Unit 1 and Unit 2 are revised in accordance with NRC Generic Letter 91-08. Specifically, references to Table 3.6-1 are deleted, a note indicating that "the provisions of Specification 3.0.4 do not apply" is added, and a note stating that "locked or sealed closed valves may be opened on an intermittent basis under administrative control" is added to Specification 3/4.6.3. In addition Unit 1 Surveillance Requirements 4.6.3.1.1.a and 4.6.3.1.2.d is revised to delete the "< and ≥" symbols and replaced with "less than" and "is greater than or equal to". Both Unit 1 and Unit 2 Surveillance Requirement 4.6.3.1.1.b deletes "above" for clarity as the "above" test is only for weight or spring loaded check valves.

Technical Specification CONTAINMENT SYSTEMS BASES 3/4.6.3 for Unit 1 and Unit 2 are revised in accordance with NRC Generic Letter 91-08. Specifically, the following paragraph is added to the appropriate bases sections: "The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with control room, at the valve controls, and (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment."

Technical Specification 3.8.2.5 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" for Unit 2 is revised in accordance with NRC Generic Letter 91-08. Specifically, LCO 3.8.2.5 is replaced with the LCO statements "Primary and backup containment penetration conductor overcurrent protective devices associated with each containment electrical penetration circuit shall be OPERABLE. The scope of these protective devices excludes those circuits for which credible fault currents would not exceed the electrical penetration design rating," and both the Action Statement for Specification 3.8.2.5 and Surveillance Requirement 4.8.2.5.a.1.(b) are revised to delete references to Table 3.8-1.

Technical Specification 3.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" for Unit 2 is revised in accordance with NRC Generic Letter 91-08 to delete references to Table 3.8-2. In addition, all references to the bypass devices are deleted since none of the motor operated valves listed in the current Table 3.8-2 are equipped with bypass devices. Deleting the reference to the bypass devices results in deleting Surveillance Requirement 4.8.2.6.a which is not required unless the bypass devices are installed.

Technical Specification 3.8.2.7 "NORMALLY DE-ENERGIZED POWER CIRCUITS" for Unit 2 is revised to delete Table 3.8-3 and references to that table in the LCO, Action, and Surveillance Requirements. In addition, the statement "when operating in Modes 1-4" has been deleted from Surveillance Requirement 4.8.2.7 as the Modes requiring the surveillance are already specified in the Applicability. This technical specification was added to Unit 2 by Amendment #21, dated May 3, 1982, to list those loads whose electrical containment penetrations do not have secondary protection devices and could have creditable fault currents that could exceed the electrical penetration design rating. Although not listed in NRC Generic Letter 91-08, this component list meets the intent of the Generic Letter for those lists that could be relocated to plant procedures.

Description Of Specific Changes

The proposed technical specification changes will relocate the lists of containment isolation valves for Unit 1 and Unit 2, Unit 2 containment penetration conductor overcurrent protective devices, Unit 2 motor-operated valves (MOVs) thermal overload devices, and Unit 2 normally deenergized loads from the technical specifications to plant procedures which are controlled in accordance with the provisions of the administrative controls section of the applicable technical specifications. Associated Technical Specifications are modified in accordance with Generic Letter 91-08, and administrative changes are made to enhance clarity and accuracy. Specifically, the North Anna Unit 1 and Unit 2 Technical Specifications are revised as follows:

- North Anna Unit 1 Technical Specification Index Page IX for Section 3/4.8.2 is modified to delete subsections "A.C. Distribution - Shutdown" and "D.C. Distribution - Shutdown" and replace with subsection "A.C. and D.C. Distribution - Shutdown" on page 3/4 8-7.
- North Anna Unit 1 Technical Specification Index Page IX for Section 3/4.9.8 is modified to add "(RHR)" after RESIDUAL HEAT REMOVAL and change the title of the two subsections to "Normal Water Level" and "Low Water Levels."
- North Anna Unit 1 Technical Specification Index Page IX for Section 3/4.9.10 is modified to add the two subsections "Fuel Assemblies" and "Control Rods."
- North Anna Unit 2 Technical Specification Index Page VIII for Section 3/4.8.2 is modified to delete subsections "A.C. Distribution - Shutdown" and "D.C. Distribution - Shutdown" and replace with subsection "A.C. and D.C. Distribution - Shutdown" on page 3/4 8-12. The phrase "and/or Bypass" associated with "Motor Operated Valves Thermal Overload Protection Devices" is also deleted.
- North Anna Unit 2 Technical Specification Index Page IX for Section 3/4.9.8 is modified to add "(RHR)" after RESIDUAL HEAT REMOVAL and change the title of the two subsections to "Normal Water Level" and "Low Water Levels."
- North Anna Unit 2 Technical Specification Index Page IX for Section 3/4.9.10 is modified to add the two subsections "Fuel Assemblies" and "Control Rods."
- North Anna Unit 1 Technical Specification Definition Page 1-2 item 1.6.1.b "CONTAINMENT INTEGRITY" is modified to delete "except as provided in Table 3.6-1 of Specification 3.6.3.1" and add "except for valves that are open under administrative control as permitted by Specification 3.6.3.1."

- North Anna Unit 2 Technical Specification Definition Page 1-2 item 1.6.1.b "CONTAINMENT INTEGRITY" is modified to delete "except as provided in Table 3.6-1 of Specification 3.6.3.1" and add "except for valves that are open under administrative control as permitted by Specification 3.6.3.1."
- North Anna Unit 1 Technical Specification Surveillance Requirement 4.6.1.1.a "CONTAINMENT INTEGRITY" is modified to delete "except as provided in Table 3.6-1 of Specification 3.6.3.1" and add "except for valves that are open under administrative control as permitted by Specification 3.6.3.1."
- North Anna Unit 2 Technical Specification Surveillance Requirement 4.6.1.1.a "CONTAINMENT INTEGRITY" is modified to delete "except as provided in Table 3.6-1 of Specification 3.6.3.1" and add "except for valves that are open under administrative control as permitted by Specification 3.6.3.1."
- North Anna Unit 1 Technical Specification Limiting Condition for Operation 3.6.3.1 "CONTAINMENT ISOLATION VALVES" is modified to delete "The containment isolation valves specified in Table 3.6-1 shall be OPERABLE with isolation times as shown in Table 3.6-1" and add "Each containment isolation valve shall be OPERABLE.*"
- North Anna Unit 2 Technical Specification Limiting Condition for Operation 3.6.3.1 "CONTAINMENT ISOLATION VALVES" is modified to delete "The containment isolation valves specified in Table 3.6-1 shall be OPERABLE with isolation times as shown in Table 3.6-1" and add "Each containment isolation valve shall be OPERABLE.*"
- North Anna Unit 1 Technical Specification Action Statement for LCO 3.6.3.1 "CONTAINMENT ISOLATION VALVES" is modified to replace "With one or more of the isolation valve(s) specified in Table 3.6-1 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and either:" with the phrase "With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:" The sentence "The provisions of Specification 3.0.4 do not apply." is also added at the end of the technical specification action statements.
- North Anna Unit 2 Technical Specification Action Statement for LCO 3.6.3.1 "CONTAINMENT ISOLATION VALVES" is modified to replace "With one or more of the isolation valve(s) specified in Table 3.6-1 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and either:" with the phrase "With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:" The sentence "The provisions of Specification 3.0.4 do not apply." is also added at the end of the technical specification action statements.

- North Anna Unit 1 Technical Specification Surveillance Requirement 4.6.3.1.1 "CONTAINMENT ISOLATION VALVES" is modified to replace "The isolation valves specified in Table 3.6-1 shall be demonstrated OPERABLE:" with the sentence "Each containment isolation valve shall be demonstrated OPERABLE:."
- North Anna Unit 2 Technical Specification Surveillance Requirement 4.6.3.1.1 "CONTAINMENT ISOLATION VALVES" is modified to replace "The isolation valves specified in Table 3.6-1 shall be demonstrated OPERABLE:" with the sentence "Each containment isolation valve shall be demonstrated OPERABLE:."
- North Anna Unit 1 Technical Specification Surveillance Requirement 4.6.3.1.1.a "CONTAINMENT ISOLATION VALVES" is modified to delete the "<" symbol and replace that symbol with the phrase "less than." The "≥" symbol is also replaced with the phrase "is greater than or equal to."
- In North Anna Unit 1 Technical Specification Surveillance Requirement 4.6.3.1.1. "CONTAINMENT ISOLATION VALVES," the note "Locked or sealed closed valves may be opened on an intermittent basis under administrative control" is added at the bottom of page 3/4 6-15.
- In North Anna Unit 2 Technical Specification Surveillance Requirement 4.6.3.1.1. "CONTAINMENT ISOLATION VALVES," the note "Locked or sealed closed valves may be opened on an intermittent basis under administrative control" is added at the bottom of page 3/4 6-14.
- In North Anna Unit 1 Technical Specification Surveillance Requirement 4.6.3.1.1.b "CONTAINMENT ISOLATION VALVES," the word "above" is deleted.
- In North Anna Unit 2 Technical Specification Surveillance Requirement 4.6.3.1.1.b "CONTAINMENT ISOLATION VALVES," the word "above" is deleted.
- In North Anna Unit 1 Technical Specification Surveillance Requirement 4.6.3.1.2 "CONTAINMENT ISOLATION VALVES," the phrase "specified in Table 3.6-1" is deleted, and the word "containment" is inserted after the word "Each."
- In North Anna Unit 2 Technical Specification Surveillance Requirement 4.6.3.1.2 "CONTAINMENT ISOLATION VALVES," the phrase "specified in Table 3.6-1" is deleted, and the word "containment" is inserted after the word "Each."
- In North Anna Unit 1 Technical Specification Surveillance Requirement 4.6.3.1.2.d "CONTAINMENT ISOLATION VALVES," the "<" symbol is replaced with the phrase "less than," and the "≥" symbol is replaced with the phrase "is greater than or equal to."

- In North Anna Unit 1 Technical Specification Surveillance Requirement 4.6.3.1.3, the phrase "of Table 3.6-1" is deleted, and the words "containment isolation" are inserted before the word "valve."
- In North Anna Unit 2 Technical Specification Surveillance Requirement 4.6.3.1.3 "CONTAINMENT ISOLATION VALVES," the phrase "of Table 3.6-1" is deleted, and the words "containment isolation" are inserted before the word "valve."
- In North Anna Unit 1 Technical Specification 3/4.6.3.1 "CONTAINMENT ISOLATION VALVES," pages 3/4 6-17 through 3/4 6-32 (Table 3.6-1, list of Containment Isolation Valves) are deleted.
- In North Anna Unit 2 Technical Specification 3/4.6.3.1 "CONTAINMENT ISOLATION VALVES," pages 3/4 6-16 through 3/4 6-31 (Table 3.6-1, list of Containment Isolation Valves) are deleted.
- North Anna Unit 1 Technical Specification Bases Section 3/4.6.3 "CONTAINMENT ISOLATION VALVES" is revised by adding the paragraph "The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with control room, at the valve controls, (2) instructing this operator to close the valve(s) in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valve(s) and that this action will prevent the release of radioactivity outside the containment."
- North Anna Unit 2 Technical Specification Bases Section 3/4.6.3 "CONTAINMENT ISOLATION VALVES" is revised by adding the paragraph "The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with control room, at the valve controls, (2) instructing this operator to close the valve(s) in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valve(s) and that this action will prevent the release of radioactivity outside the containment."
- North Anna Unit 2 Technical Specification Limiting Condition for Operation 3.8.2.5 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" is revised by replacing the sentence "All containment penetration conductor overcurrent protective devices shown in Table 3.8-1 shall be OPERABLE" with "Primary and backup containment penetration conductor overcurrent protective devices associated with each containment electrical penetration circuit shall be OPERABLE. The scope of these protective devices excludes those circuits for which creditable fault currents would not exceed the electrical penetration design rating."

- North Anna Unit 2 Technical Specification Action Statement for LCO 3.8.2.5 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" is revised by deleting the phrase "shown in Table 3.8-1."
- North Anna Unit 2 Technical Specification Surveillance Requirement 4.8.2.5 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" is revised by deleting the phrase "shown in Table 3.8-1."
- North Anna Unit 2 Technical Specification Surveillance Requirement 4.8.2.5.1.b "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" is revised by deleting the phrase "and as specified in Table 3.8-1."
- North Anna Unit 2 Technical Specification 3/4.8.2.5 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES" is revised by deleting pages 3/4 8-18 through 3/4 8-20 (Table 3.8-1, list of Containment Penetration Conductor Overcurrent Protective Devices).
- North Anna Unit 2 Technical Specification 3/4.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" is revised by deleting the phrase "AND/OR BYPASS" at the top of page 3/4 8-21.
- North Anna Unit 2 Technical Specification Limiting Condition for Operation 3.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" is revised by replacing the sentence "The thermal overload protection and/or bypass devices, integral with the motor starter, of each valve listed in Table 3.8.2 shall be OPERABLE" with "The thermal overload protection devices, integral with the motor starter, of each valve used in safety systems shall be OPERABLE."
- North Anna Unit 2 Technical Specification Action Statement for LCO 3.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" is revised by deleting the phrase "and/or bypass devices."
- North Anna Unit 2 Technical Specification Surveillance Requirement 4.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" is revised to delete requirement for proving the operability of (non-existent) bypass devices and is replaced with "The above required thermal overload protection devices shall be demonstrated OPERABLE at least once per 18 months by the performance of a CHANNEL CALIBRATION of a representative sample of at least 25% of all thermal overload devices, such that each device is calibrated at least once per 6 years."

- North Anna Unit 2 Technical Specification 3/4.8.2.6 "MOTOR OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES" is revised by deleting pages 3/4 8-22 through 3/4 8-25 (Table 3.8-2, list of Motor-Operated Valves - Thermal Overload Protection and/or Bypass Devices).
- North Anna Unit 2 Technical Specification LCO 3.8.2.7 "NORMALLY DE-ENERGIZED POWER CIRCUITS" is revised to replace the sentence "All circuits shown in Table 3.8-3 shall be de-energized:" with "All circuits that have containment penetrations and are not required during reactor operation shall be de-energized."
- North Anna Unit 2 Technical Specification Action Statement for LCO 3.8.2.7 "NORMALLY DE-ENERGIZED POWER CIRCUITS" is reworded to read "With one or more of the circuits described above energized, de-energize the circuit(s) within 72 hours or be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours."
- North Anna Unit 2 Technical Specification Surveillance Requirement 4.8.2.7 "NORMALLY DE-ENERGIZED POWER CIRCUITS" is reworded to read "At least once per 31 days, verify that all the circuits described above are de-energized by noting the position of the appropriate circuit breakers."
- North Anna Unit 2 Technical Specification 3.8.2.7 "NORMALLY DE-ENERGIZED POWER CIRCUITS" is revised to delete page 3/4 8-27 (Table 3.8-3, list of Normally De-energized Power Circuits).

Safety Significance

This technical specification change request will relocate the lists of containment penetration conductor overcurrent protective devices (Unit 1 TS 3.8.2.5, Table 3.8-1), safety related MOV thermal overload devices (Unit 1 TS 3.8.2.6, Table 3.8-2) and normally de-energized containment loads (Unit 1 TS 3.8.2.7, Table 3.8-3) and containment isolation valves (Unit 1 and Unit 2 TS 3.6.3.1, Table 3.6-1) to plant procedures. By relocating these lists to plant procedures any identified discrepancies can be updated in a timely manner without prior NRC approval. The LCO, the Action Statements, and the Surveillance Requirements would still apply to the components in these tables. The difference would be that, rather than being specifically listed in TS tables, the lists of these components would be identified and maintained in plant procedures in accordance with the administrative controls section of the applicable technical specifications. The removal of these tables is in accordance with the guidance provided in NRC Generic Letter 91-08. Deleting the reference to the thermal overload bypass devices in TS 3.8.2.6 reflects the actual plant configuration since none of the referenced MOV's have or are required to have the bypass devices.

1. This technical specification change request does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report. This request removes Tables 3.8-1, 3.8-2, and 3.8-3 from Unit 1 Technical Specifications (component lists) and Table 3.6-1 from both Unit 1 and Unit 2 Technical Specifications, but it does not alter the application of the technical requirements which are contained in the specifications. This technical specification change does not require any modifications to plant hardware or operating practices. Therefore, this technical specification change request has no effect on any previously analyzed accidents.
2. This technical specification change request does not create the possibility of an accident or malfunction of a different type than any evaluated previously in the safety analysis report. This technical specification change request does not affect any operating, maintenance, or surveillance practices or methods. Also, there are no design or hardware modifications associated with the proposed changes. Therefore, the possibility of a malfunction or failure or the possibility of a work practice resulting in a new or different kind of accident remains unchanged.
3. This technical specification change request does not reduce the margin of safety as defined in the basis for any North Anna Power Station technical specification. The removal of component lists in Tables 3.8-1, 3.8-2, and 3.8-3 from Unit 1 Technical Specifications and Table 3.6-1 from Unit 1 and Unit 2 Technical Specifications has no impact on the performance of the plant nor does it reduce the scope of the requirements of the applicable Technical Specifications. Therefore, there is not a reduction of any safety margin due to this technical specification change request.

Based on the above evaluation, relocating the component lists from Technical Specifications to plant procedures governed by the provisions of the administrative controls section of the applicable technical specifications does not result in an unreviewed safety question as defined in the criteria of 10 CFR 50.59.