

Attachment 2
Technical Specifications Changes

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LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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1.0 DEFINITIONS (Continued)

- a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or
 - b. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.
- 1.6.2 All equipment hatches are closed and sealed.
- 1.6.3 Each air lock is OPERABLE pursuant to Specification 3.6.1.3.
- 1.6.4 The containment leakage rates are within the limits of Specification 3.6.1.2 and
- 1.6.5 The sealing mechanism associated with each penetration (e.g. welds, bellows or O-rings) is OPERABLE.

CONTROLLED LEAKAGE

1.7 CONTROLLED LEAKAGE shall be that seal water flow supplied to the reactor coolant pump seals.

CORE ALTERATION

1.8 CORE ALTERATION shall be the movement or manipulation of any component within the reactor pressure vessel with the vessel head removed and fuel in the vessel. suspension of CORE ALTERATION shall preclude completion of movement of a component to a safe conservative position.

CORE OPERATING LIMITS REPORT

1.9 The CORE OPERATING LIMITS REPORT is the unit-specific document that provides core operating limits for the current operating reload cycle. These cycle-specific core operating limits shall be determined for each reload cycle in accordance with Specification 6.9.1.7 Plant operation within these operating limits is addressed in individual specifications.

DOSE EQUIVALENT I-131

1.10 The DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134 and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, "Calculation of Distance Factors for Power and Test Reactor Sites".

\bar{E} -AVERAGE DISINTEGRATION ENERGY

1.11 \bar{E} shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives greater than 15 minutes, making up at least 95% of the total non-iodine activity in the coolant.

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3, and 4

ACTION

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY 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

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves, secured in their positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.
- b. By verifying that each containment air lock is OPERABLE per Specification 3.6.1.3.
- c. After each closing of the equipment hatch, by leak rate testing the equipment hatch seals, with gas at P_a , greater than or equal to 44.1 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Specification 4.6.1.2.b for all other Type B and C penetrations, the combined leakage rate is less than or equal to $0.60 L_a$.
- d. Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line.

*Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked sealed or otherwise sealed in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such surveillance need not be performed more often than once per 92 days.

CONTAINMENT SYSTEMS

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3.1 Each containment isolation valve shall be OPERABLE.*

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

The provisions of Specification 3.0.4 do not apply.

SURVEILLANCE REQUIREMENTS

4.6.3.1.1 Each containment isolation valve shall be demonstrated OPERABLE:

- a. At least once per 92 days by cycling each weight or spring loaded check valve testable during plant operation, through one complete cycle of full travel and verifying that each check valve remains closed when the differential pressure in the direction of flow is less than 1.2 psid and opens when the differential pressure in the direction of flow is greater than or equal to 1.2 psid but less than 5.0 psid.

* Locked or sealed closed valves may be opened on an intermittent basis under administrative control.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. Prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of the applicable cycling test and verification of isolation time.

4.6.3.1.2 Each containment isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:

- a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position.
- b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position.
- c. Verifying that on a Containment Purge and Exhaust isolation signal, each Purge and Exhaust valve actuates to its isolation position.
- d. Cycling each weight or spring loaded check valve not testable during plant operation, through one complete cycle of full travel and verifying that each check valve remains closed when the differential pressure in the direction of flow is less than 1.2 psid and opens when the differential pressure in the direction of flow is greater than or equal to 1.2 psid but less than 5.0 psid.

4.6.3.1.3 The isolation time of each power operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

PAGES 3/4 6-17 THROUGH 3/4 6-32 HAVE BEEN DELETED

CONTAINMENT SYSTEMS

BASES

3/4.6.2.3 CHEMICAL ADDITION SYSTEM

The OPERABILITY of the chemical addition system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH minimum volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the accident analysis.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the times limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

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 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.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with 1) zirconium-water reactions, 2) radiolytic decomposition of water 3) corrosion of metals within containment. These hydrogen control systems are consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA", March 1971.

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1.0 DEFINITIONS (Continued)

- a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or
 - b. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.
- 1.6.2 All equipment hatches are closed and sealed.
- 1.6.3 Each air lock is OPERABLE pursuant to Specification 3.6.1.3.
- 1.6.4 The containment leakage rates are within the limits of Specification 3.6.1.2 and
- 1.6.5 The sealing mechanism associated with each penetration (e.g. welds, bellows or O-rings) is OPERABLE.

CONTROLLED LEAKAGE

1.7 CONTROLLED LEAKAGE shall be that seal water flow supplied to the reactor coolant pump seals.

CORE ALTERATION

1.8 CORE ALTERATION shall be the movement or manipulation of any component within the reactor pressure vessel with the vessel head removed and fuel in the vessel. suspension of CORE ALTERATION shall not preclude completion of movement of a component to a safe conservative position.

CORE OPERATING LIMITS REPORT

1.9 The CORE OPERATING LIMITS REPORT is the unit-specific document that provides core operating limits for the current operating reload cycle. These cycle-specific core operating limits shall be determined for each reload cycle in accordance with Specification 6.9.1.7 Plant operation within these operating limits is addressed in individual specifications.

DOSE EQUIVALENT I-131

1.10 The DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134 and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, "Calculation of Distance Factors for Power and Test Reactor Sites".

\bar{E} -AVERAGE DISINTEGRATION ENERGY

1.11 \bar{E} shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives greater than 15 minutes, making up at least 95% of the total non-iodine activity in the coolant.

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3, and 4

ACTION

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY 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

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves, secured in their positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.
- b. By verifying that each containment air lock is OPERABLE per Specification 3.6.1.3.
- c. After each closing of the equipment hatch, by leak rate testing the equipment hatch seals, with gas at P_a , greater than or equal to 44.1 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Specification 4.6.1.2.b for all other Type B and C penetrations, the combined leakage rate is less than or equal to $0.60 L_a$.
- d. Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line.

*Except valves, blind flanges and deactivated automatic valves which are located inside the containment and are locked sealed or otherwise sealed in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such surveillance need not be performed more often than once per 92 days.

CONTAINMENT SYSTEMS

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3.1 Each containment isolation valve shall be OPERABLE.*

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

The provisions of Specification 3.0.4 do not apply.

SURVEILLANCE REQUIREMENTS

4.6.3.1.1 Each containment isolation valve shall be demonstrated OPERABLE:

- a. At least once per 92 days by cycling each weight or spring loaded check valve testable during plant operation, through one complete cycle of full travel and verifying that each check valve remains closed when the differential pressure in the direction of flow is less than 1.2 psid and opens when the differential pressure in the direction of flow is greater than or equal to 1.2 psid but less than 5.0 psid.
- b. Prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of the applicable cycling test and verification of isolation time.

* Locked or sealed closed valves may be opened on an intermittent basis under administrative control.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.6.3.1.2 Each containment isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:

- a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position.
- b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position.
- c. Verifying that on a Containment Purge and Exhaust isolation signal, each Purge and Exhaust valve actuates to its isolation position.
- d. Cycling each weight or spring loaded check valve not testable during plant operation, through one complete cycle of full travel and verifying that each check valve remains closed when the differential pressure in the direction of flow is less than 1.2 psid and opens when the differential pressure in the direction of flow is greater than or equal to 1.2 psid but less than 5.0 psid.

4.6.3.1.3 The isolation time of each power operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

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ELECTRICAL POWER SYSTEMS

CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES

LIMITING CONDITION FOR OPERATION

3.8.2.5 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.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one or more of the containment penetration conductor overcurrent protective device (s) inoperable either:

- a. Restore the protective device(s) to OPERABLE status or de-energize the circuit(s) by tripping the associated circuit breaker within 72 hours and verify the circuit breaker to be tripped at least once per 7 days thereafter; the provisions of Specification 3.0.4 are not applicable to overcurrent devices in circuits which have their circuit breakers tripped, or
- b. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.8.2.5 All containment penetration conductor overcurrent protective devices shall be demonstrated OPERABLE:

- a. At least once per 18 months:
 1. By verifying that, on a rotating basis at least one 4.16 KV circuit breaker is OPERABLE by performing the following:
 - (a) A CHANNEL CALIBRATION of the associated protective relays, and
 - (b) An integrated system functional test which includes simulating automatic actuation of the system and verifying that each relay and associated circuit breakers and control circuits function as designed.

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ELECTRICAL POWER SYSTEMS

MOTOR-OPERATED VALVES THERMAL OVERLOAD PROTECTION DEVICES

LIMITING CONDITION FOR OPERATION

3.8.2.6 The thermal overload protection devices, integral with the motor starter, of each valve used in safety systems shall be OPERABLE.

APPLICABILITY: Whenever the motor operated valve is required to be OPERABLE.

ACTION:

With one or more of the thermal overload protection devices inoperable, declare the affected valve(s) inoperable and apply the appropriate ACTION Statement(s) for the affected valve(s).

SURVEILLANCE REQUIREMENTS

4.8.2.6 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.

PAGES 3/4 8-23 THROUGH 3/4 8-25 HAVE BEEN DELETED

ELECTRICAL POWER SYSTEMS

NORMALLY DE-ENERGIZED POWER CIRCUITS

LIMITING CONDITION FOR OPERATION

3.8.2.7 All circuits that have containment penetrations and are not required during reactor operation shall be de-energized.

APPLICABILITY: MODES 1, 2, 3, 4.

ACTION:

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.

SURVEILLANCE REQUIREMENTS

4.8.2.7 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.

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CONTAINMENT SYSTEMS

BASES

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 and 3/4.6.2.2 CONTAINMENT QUENCH AND RECIRCULATION SPRAY SYSTEMS

The OPERABILITY of the containment spray systems ensures that containment depressurization and subsequent return to subatmospheric pressure will occur in the event of a LOCA. The pressure reduction and resultant termination of containment leakage are consistent with the assumptions used in the accident analyses.

3/4.6.2.3 CHEMICAL ADDITION SYSTEM

The OPERABILITY of the chemical addition system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH minimum volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the accident analysis.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the times limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

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 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.

Attachment 3

Significant Hazards Consideration

SIGNIFICANT HAZARDS CONSIDERATION

Technical Specification 3.6.3.1 for Units 1 and 2 lists the containment isolation valves. The operability of these valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Unit 2 Technical Specification 3.8.2.5 lists the containment penetration conductor overcurrent protective devices. The operability of these protective devices ensures the integrity of their penetrations in the event of a creditable fault current. Unit 2 Technical Specification 3.8.2.6 lists the motor-operated valves thermal overload protection devices for safety-related systems. The operability of these devices ensures that they will not prevent safety-related valves from performing their function. Unit 2 Technical Specification 3.8.2.7 lists those circuits that are normally deenergized during reactor operation. These circuits are deenergized to ensure that their penetrations will remain functional during reactor operation.

The proposed technical specification changes will relocate the above lists to plant procedures governed by the provisions of the administrative controls section of the applicable technical specifications and revise the associated technical specifications in accordance with the Nuclear Regulatory Commission Generic Letter 91-08.

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 the North Anna Power Station in accordance with the proposed technical specification changes will not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated. This proposed technical specification change removes certain component lists from the technical specifications, but it does not alter the application of the technical requirements which are contained in the specifications. This proposed technical specification change does not require any modifications to plant hardware or operating practices. Therefore, the proposed technical specification change has no effect on any previously analyzed accidents.
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed technical specification change does not affect any operating, maintenance, or surveillance practices or methods. Also, there are no design or hardware modifications associated with the proposed change. 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) Involve a significant reduction in a margin of safety. The removal of the lists has no impact on the performance of the plant nor does it reduce the scope or the requirement of the technical specifications. Therefore, there is no reduction of any safety margin due to this technical specification change request.

Virginia Electric and Power Company concludes that the activities associated with this proposed Technical Specification change satisfies the no significant hazards consideration criteria of 10 CFR 50.92 and, accordingly, a no significant hazards consideration finding is justified.