

PLANT SYSTEMS

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

- a. Two motor driven auxiliary feedwater pumps, each capable of being powered from separate emergency busses, and
- b. One steam turbine driven auxiliary feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

- a. With one auxiliary feedwater pump inoperable, restore the required auxiliary feedwater pumps to an OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the following 6 hours.
- b. With two auxiliary feedwater pumps inoperable be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.
- c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status as soon as possible.

SURVEILLANCE REQUIREMENTS

4.7.1.2 In addition to the requirements of Specification 4.0.5, each auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 1. 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.
- b. At least once per 92 days on a STAGGERED TEST BASIS by:
 1. Verifying that each pump develops adequate discharge pressure and flow. The acceptance criterion shall be consistent with Specification 4.0.5. The provisions of Specification 4.0.4 are not applicable to steam turbine driven pump testing.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months during shutdown by:
 - 1. Verifying that each automatic valve in the flow path actuates to its correct position on an auxiliary feedwater actuation test signal.
 - 2. Verifying that each auxiliary feedwater pump starts automatically upon receipt of an auxiliary feedwater actuation test signal.
- d. The auxiliary feedwater system flow paths shall be demonstrated OPERABLE prior to entry into MODE 3 following each COLD SHUTDOWN by performing a flow test to verify the normal flow path from the emergency condensate storage tank through each auxiliary feedwater pump to its associated steam generator.

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Attachment 3

Significant Hazards Consideration

Significant Hazards Considerations

The NRC has completed a comprehensive examination of surveillance requirements in technical specifications that require testing at power. The evaluation is documented in NUREG-1366, "Improvements to Technical Specification Surveillance Requirements," dated December 1992. The NRC staff found, that while the majority of testing at power is important, safety can be improved, equipment degradation decreased, and an unnecessary burden on personnel resources eliminated by reducing the amount of testing at power that is required by technical specifications. Based on the results of the evaluations documented in NUREG 1366, the NRC issued Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," dated September 27, 1993.

The Auxiliary Feedwater System supplies water to the steam generators to remove decay heat from the Reactor Coolant System. To ensure operability of the Auxiliary Feedwater System, the pumps are currently tested on a monthly basis as required by Technical Specifications. Consistent with Generic Letter 93-05, Item 9.1 and NUREG-1366, we are requesting a change to the surveillance testing frequency for the Auxiliary Feedwater Pumps from monthly to quarterly on a staggered test basis.

Virginia Electric and Power Company has reviewed the proposed 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 proposed Technical Specifications changes will not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated.

Changing the surveillance test frequencies of the Auxiliary Feedwater System pumps does not significantly affect the probability of occurrence or consequences of any previously evaluated accidents. Quarterly testing of the pumps on a staggered basis will continue to assure that the Auxiliary Feedwater System will be capable of performing its intended functions. Therefore, the change in frequency of testing the Auxiliary Feedwater System pumps does not affect the probability or consequences of any previously analyzed accident.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

Changing the surveillance test frequency of the Auxiliary Feedwater System pumps does not involve any physical modification of the plant or result in a change in a method of operation. Quarterly testing of the Auxiliary Feedwater System pumps on a staggered basis will continue to assure that the Auxiliary Feedwater System will be capable of performing its intended function. Therefore, a new or different type of accident is not made possible.

3. Involve a significant reduction in a margin of safety.

Changing the surveillance test frequency of the Auxiliary Feedwater System pumps does not affect any safety limits or limiting safety system settings. System operating parameters are unaffected. The availability of equipment required to mitigate or assess the consequence of an accident is not reduced. Quarterly testing of the Auxiliary Feedwater System pumps on a staggered basis will continue to assure that the Auxiliary Feedwater System will be capable of performing its intended functions. Safety margins are, therefore, not decreased.