

ATTACHMENT ONE

TECHNICAL SPECIFICATION CHANGES

NORTH ANNA - UNITS 1 AND 2

VIRGINIA ELECTRIC AND POWER COMPANY

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## ADMINISTRATIVE CONTROLS

### 6.2.3 STATION NUCLEAR SAFETY (SNS)

#### FUNCTION

- 6.2.3.1 SNS shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources which may indicate areas for improving plant safety.

#### COMPOSITION

- 6.2.3.2 SNS shall be composed of at least five dedicated, full-time engineers located onsite.

#### RESPONSIBILITIES

- 6.2.3.3 SNS shall be responsible for maintaining surveillance of plant activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.
- 6.2.3.4 SNS shall disseminate relevant operational experience.

#### AUTHORITY

- 6.2.3.5 SNS shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Assistant Station Manager (Nuclear Safety and Licensing).

### 6.2.4 SHIFT TECHNICAL ADVISOR

- 6.2.4.1 The Shift Technical Advisor shall serve in an advisory capacity to the Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit.

\* Not responsible for sign-off function.



## ADMINISTRATIVE CONTROLS

### 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANS 3.1-(12/79 Draft) for comparable positions and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for:

1. The Superintendent - Radiological Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
2. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.
3. The Superintendent Operations shall hold (or have previously held) a Senior Reactor Operator License for North Anna Power Station or a similar design Pressurized Water Reactor plant.
4. The Supervisor Shift Operations shall hold an active Senior Reactor Operator License for North Anna Power Station.

### 6.4 TRAINING

6.4.1 The Manager - Nuclear Training is responsible for ensuring that retraining and replacement training programs for the facility staff are maintained and that such programs meet or exceed the requirements and recommendations of Section 5 of ANS 3.1-(12/79 Draft) and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the SNS.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 STATION NUCLEAR SAFETY AND OPERATING COMMITTEE (SNSOC)

##### FUNCTION

6.5.1.1 The SNSOC shall function to advise the Station Manager on all matters related to nuclear safety.

## ADMINISTRATIVE CONTROLS

### COMPOSITION

6.5.1.2 The SNSOC shall be composed of:

Chairman: Assistant Station Manager (Nuclear Safety and Licensing)  
Vice Chairman and Member: Assistant Station Manager (Operations and Maintenance)  
Member: Superintendent - Operations  
Member: Superintendent - Maintenance  
Member: Superintendent - Radiological Protection  
Member: Superintendent - Engineering

### ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SNSOC Chairman to serve on a temporary basis; however, no more than one alternate shall participate as a voting member in SNSOC activities at any one time.

## ADMINISTRATIVE CONTROLS

### 6.2.3 STATION NUCLEAR SAFETY (SNS)

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#### COMPOSITION

- 6.2.3.2 SNS shall be composed of at least five dedicated, full-time engineers located onsite.

#### RESPONSIBILITIES

- 6.2.3.3 SNS shall be responsible for maintaining surveillance of plant activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.
- 6.2.3.4 SNS shall disseminate relevant operational experience.

#### AUTHORITY

- 6.2.3.5 SNS shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Assistant Station Manager (Nuclear Safety and Licensing).

### 6.2.4 SHIFT TECHNICAL ADVISOR

- 6.2.4.1 The Shift Technical Advisor shall serve in an advisory capacity to the Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit.

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\* Not responsible for sign-off function.



## ADMINISTRATIVE CONTROLS

### 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANS 3.1-(12/79 Draft) for comparable positions and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for:

1. The Superintendent - Radiological Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September, 1975.
2. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.
3. The Superintendent Operations shall hold (or have previously held) a Senior Reactor Operator License for North Anna Power Station or a similar design Pressurized Water Reactor plant.
4. The Supervisor Shift Operations shall hold an active Senior Reactor Operator License for North Anna Power Station.

### 6.4 TRAINING

6.4.1 The Manager - Nuclear Training is responsible for ensuring that retraining and replacement training programs for the facility staff are maintained and that such programs meet or exceed the requirements and recommendations of Section 5 of ANS 3.1-(12/79 Draft) and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the SNS.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 STATION NUCLEAR SAFETY AND OPERATING COMMITTEE (SNSOC)

##### FUNCTION

6.5.1.1 The SNSOC shall function to advise the Station Manager on all matters related to nuclear safety.

## ADMINISTRATIVE CONTROLS

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### COMPOSITION

6.5.1.2 The SNSOC shall be composed of:

Chairman: Assistant Station Manager (Nuclear Safety and Licensing)  
Vice Chairman and Member: Assistant Station Manager (Operations and Maintenance)  
Member: Superintendent - Operations  
Member: Superintendent - Maintenance  
Member: Superintendent - Radiological Protection  
Member: Superintendent - Engineering

### ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SNSOC Chairman to serve on a temporary basis; however, no more than one alternate shall participate as a voting member in SNSOC activities at any one time.

**ATTACHMENT TWO**

**CHANGES TO PROPOSED**  
**MERITS TECHNICAL SPECIFICATIONS**

**NORTH ANNA POWER STATION**  
**UNITS 1 AND 2**

**VIRGINIA ELECTRIC AND POWER COMPANY**



5.0 ADMINISTRATIVE CONTROLS (continued)

5.3 FACILITY STAFF QUALIFICATIONS

Each member of the unit staff shall meet or exceed the minimum qualifications of ANS 3.1-(12/79 Draft) for comparable positions and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for: (1) ~~the Superintendent - Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and~~ (2) ~~the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.~~

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- RADIOLOGICAL PROTECTION
1. The Superintendent - ~~Health Physics~~ shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975,
  2. The Shift Technical Advisor ~~who~~ shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents,
  3. The Superintendent <sup>9</sup> of Operations shall hold (or have previously held) a Senior Reactor Operator License for North Anna Power Station or a similar design Pressurized Water Reactor plant.
  4. The Supervisor Shift Operations shall hold an active Senior Reactor Operator License for North Anna Power Station.

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## 5.0 ADMINISTRATIVE CONTROLS

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### 5.2 ORGANIZATION (continued)

#### 5.2.2 Facility Staff

The Facility organization shall be as shown in the UFSAR.

-----NOTE-----  
The health physics technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.  
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- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 5.2-1.
- b. At least one licensed Reactor Operator shall be in the control room when fuel is in one reactor. At least two licensed Reactor Operators shall be in the control room when fuel is in both reactors. In addition, while the unit is in MODES 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room.
- c. A health physics technician shall be onsite when fuel is in the reactor.
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include the minimum shift crew shown in Table 5.2-1 or any personnel required for other essential functions during a fire emergency.

#### 5.2.3 <sup>Station</sup> Nuclear Safety Engineering (NSE) <sup>SNS</sup>

##### 5.2.3.1 Function

<sup>SNS</sup>  
NSE shall examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources which may indicate areas for improving plant safety.

##### 5.2.3.2 Composition

<sup>SNS</sup>  
NSE shall be composed of at least five dedicated, full-time engineers located onsite.

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## 5.0 ADMINISTRATIVE CONTROLS

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### 5.2 ORGANIZATION

#### 5.2.3 <sup>Station</sup> ~~Nuclear Safety Engineering~~ <sup>SNS</sup> (NSE) (continued)

##### 5.2.3.3 Responsibilities

<sup>SNS</sup> ----- NOTE -----  
NSE members shall not be responsible for sign-off functions.  
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<sup>SNS</sup>  
a. NSE shall be responsible for maintaining surveillance of plant activities to provide independent verification that these activities are performed correctly and that human errors are reduced as much as practical.

<sup>SNS</sup>  
b. NSE shall disseminate relevant operational experience.

##### 5.2.3.4 Authority -

<sup>SNS</sup>  
NSE shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Assistant Station Manager (Nuclear Safety and Licensing).

##### 5.2.4 Shift Technical Advisor

The Shift Technical Advisor shall serve in an advisory capacity to the Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit.

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5.0 ADMINISTRATIVE CONTROLS (continued)

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5.4 TRAINING

*Nuclear Training*

The Station Manager is responsible for ensuring that retraining and replacement training programs for the facility staff are maintained and that such programs meet or exceed the requirements and recommendations of Section 5 of ANS 3.1-(12/79 Draft) and Appendix "A" of 10 CFR part 5b and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the NSE.

*SN'S*

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**ATTACHMENT THREE**  
**DISCUSSION**  
**OF**  
**PROPOSED CHANGES**

**VIRGINIA ELECTRIC AND POWER COMPANY**

## **DISCUSSION OF PROPOSED CHANGES**

### Change "Nuclear Safety Engineering" to "Station Nuclear Safety"

The proposed change to Technical Specification 6.2.3 and 6.4.1 changes the title of the Nuclear Safety Engineering (NSE) group to Station Nuclear Safety (SNS) to reflect the change in the title of the safety review group at North Anna Power Station.

This change is administrative in nature and only reflects the change in the title of the safety review group. There is no change in the function, composition, responsibilities or authority of the group. North Anna and Surry Power Stations are both changing the titles to provide a common name for the groups that provide similar functions.

### Exceptions to ANS 3.1 (12/79 Draft) Regarding Operations Manager Function.

The proposed change to Technical Specification 6.3, "Facility Staff Qualifications", adds specific exceptions to the qualification requirements of ANS 3.1 (12/79 Draft) for the Superintendent Operations and the Supervisor Shift Operations.

ANS 3.1 (12/79 Draft), which is cited in Technical Specification 6.3 for establishing the qualification requirements of the plant's staff, requires that the individual fulfilling the function of the "Operations Manager" holds a current Senior Reactor Operator's License. In the past, we have determined that the Superintendent Operations is the equivalent position in our staffing organization and therefore that position has been filled by persons holding SRO licenses.

That requirement makes it difficult for the Superintendent Operations to perform certain management functions. Specifically, his ability to monitor the quality of operating shift qualification and requalification programs is substantially impaired. The superintendent is not free to fully examine the training programs in progress, simply because he is also a trainee and is thus restricted from obtaining certain information. By relieving the Superintendent Operations from the obligation to hold a current SRO license, he then becomes free to better fulfill his management responsibilities.

In addition, a substantial part of the Superintendent Operations' time is consumed in maintaining the SRO license in an active status. The Licensed Operator Requalification Program requires four days of classroom / simulator instruction for each of eight cycles a year. In addition, the SRO must perform on-shift SRO duties, seven days each quarter-year. This 60 days of requalification time each year significantly impacts on the Superintendent Operations' time necessary to manage the plant operations effectively.

To relieve the Superintendent Operations of this burden and yet still satisfy the requirement for an "Operations Manager", we have instituted a position, directly subordinate to the Superintendent Operations that has cognizance over all of the plant operating shifts. This position is the Supervisor Shift Operations who will be required



to maintain a current and active SRO license and will fulfill the functional and qualification requirements of the "Operations Manager" as required by ANS 3.1 (12/79 Draft).

Therefore, these proposed changes are of an administrative nature, changing only the staff organization position of the individual required to maintain an SRO license and therefore fulfilling the functions of the "Operations Manager" as described in ANS-3.1 (12/79 Draft) without changing the required levels of training and qualification for that individual. The levels of responsibility and authority of the "Operations Manager" will remain as the individual immediately superior to the operating shift supervisors.

Finally, it is noted that a subsequent version of the ANS standard (i.e., ANS-3.1, 1987) explicitly describes and provides for the organizational structure described in this change. However, because ANS-3.1 (12/79 Draft) is not explicit on the issue, the proposed change is characterized as an exception to the 1979 standard.

### **BASIS FOR NO SIGNIFICANT HAZARDS DETERMINATION**

We have reviewed the proposed changes to Technical Specification 6.3 which specifies exceptions to ANS 3.1 (12/79 Draft) to allow the Supervisor Shift Operations to be the individual specified for providing the management-level Senior Reactor Operator's License, in lieu of the Superintendent Operations. Also, we have reviewed the proposed changes to Technical Specifications 6.2.3 and 6.4.1 which changes the title of the Nuclear Safety Engineering (NSE) group to Station Nuclear Safety (SNS) to reflect the change in the title of the the safety review group at North Anna Power Station.

We have found that these proposed changes will not involve a significant hazards considerations because:

- (1) The changes to Technical Specification 6.3 will not result in a significant increase in the probability or consequences of an accident previously evaluated. These changes are made only to the staff organization position of the individual designated to perform the "Operations Manager" functions as described in ANS-3.1 (12/79 Draft) without changing the required levels of training and qualification for that individual. The levels of responsibility and authority of the "Operations Manager" will remain as the individual immediately superior to the operating shift supervisors. The changes will not have any affect on the operation of the plant or any plant components or equipment.

The changes to specifications 6.2.3 and 6.4.1 will not result in a significant increase in the probability or consequences of an accident previously evaluated. These changes are administrative in nature reflecting a change in nomenclature as defined in 51 FR 7751 "e. Examples of Amendments That Are Considered Not Likely To Involve Significant Hazards Considerations...". The changes will not have any affect on the operation of the plant or any plant components or equipment.

- (2) The changes to Technical Specification 6.3 will not create the possibility of a new or different kind of accident. These changes are made only to the staff organization position of the individual designated to perform the "Operations Manager" functions as described in ANS-3.1 (12/79 Draft) without changing the required levels of training and qualification for that individual. The levels of responsibility and authority of the "Operations Manager" will remain as the individual immediately superior to the operating shift supervisors. The changes will not have any affect on the operation of the plant or any plant components or equipment.

The changes to specifications 6.2.3 and 6.4.1 will not create the possibility of a new or different kind of accident. These changes are administrative in nature reflecting a change in nomenclature as defined in 51 FR 7751 "e. Examples of Amendments That Are Considered Not Likely To Involve Significant Hazards Considerations..." The changes will not have any affect on the operation of the plant or any plant components or equipment.

- (3) The changes to Technical Specification 6.3 will not result in a significant reduction in the margins of safety. These changes are made only to the staff organization position of the individual designated to perform the "Operations Manager" functions as described in ANS-3.1 (12/79 Draft) without changing the required levels of training and qualification for that individual. The levels of responsibility and authority of the "Operations Manager" will remain as the individual immediately superior to the operating shift supervisors. The changes will not have any affect on the operation of the plant or any plant components or equipment.

The changes to specifications 6.2.3 and 6.4.1 will not result in a significant reduction in the margins of safety. These changes are administrative in nature reflecting a change in nomenclature as defined in 51 FR 7751 "e. Examples of Amendments That Are Considered Not Likely To Involve Significant Hazards Considerations..." The changes will not have any affect on the operation of the plant or any plant components or equipment.

Therefore, pursuant to 10 CFR 50.92, based on the above consideration, it has been determined that these changes will not involve a significant hazards consideration.