

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

## ADMINISTRATIVE CONTROLS

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### THIRTY-DAY WRITTEN REPORT

6.9.1.9 The types of events listed below shall be the subject of written reports to the Director of the Regional Office within 30 days of occurrence of the event. The written report shall include, as a minimum, a completed copy of the licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems.
- b. Conditions leading to operation in a degraded mode permitted by a limiting condition for operation, or plant shutdown required by a limiting condition for operation.
- c. Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.
- d. Abnormal degradation of systems other than those specified in item 6.9.1.8(c) above designed to contain radioactive material resulting from the fission process.

### CORE SURVEILLANCE REPORT

6.9.1.10 The  $F_{xy}$  limit for Rated thermal Power ( $F_{xy}^{RTP}$ ) in all core planes containing Bank "D" control rods and in all unrodded core planes, the surveillance power level,  $P_m$ , for Technical Specifications 3.2.1 and 3.2.6, and the  $F_0$  flyspeck basis as determined using the definitions and methodology in WCAP-8385 and Westinghouse letter to NRC dated April 6, 1978 Serial No. NS-CE-1749 shall be provided to the Regional Administrator, Region II, with a copy to;

Director, Office of Nuclear Reactor Regulation  
Attention: chief, Core Performance Branch  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

at least 30 days prior to cycle initial criticality. In the event that the limits would be submitted at some other time during core life, they shall be submitted 30 days prior to the date the limits would become effective unless otherwise exempted by the Commission.

## ADMINISTRATIVE CONTROLS (Continued)

at least 30 days prior to cycle initial criticality. In the event that the limits would be submitted at some other time during core life, they shall be submitted 30 days prior to the date the limits would become effective unless otherwise exempted by the Commission.

Any additional information needed to support  $F^{RTP}_{xy}$  and  $P_{xy}$  submittal will be by request from the NRC and need not be included in this report.

### SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator, Region II, within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirement of the applicable reference specification:

- a. Inservice Inspection Program Reviews shall be reported within 90 days of completion. Specification 4.4.10.1.

ATTACHMENT 2

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGE

SAFETY EVALUATION SUMMARY FOR REVISING THE  
CORE SURVEILLANCE REPORT SUBMITTAL TIME REQUIREMENTS  
FOR NORTH ANNA UNITS 1 AND 2

Presently, the Core Surveillance Report must be submitted to the NRC 60 days prior to initial criticality of the reload cycle. This proposed revision would reduce the time before criticality that the report must be submitted from 60 days to 30 days. This reduction in submittal time will allow more flexibility in scheduling core design tasks and refueling outage planning.

This change is administrative in nature and will not affect the validity of information and conclusions contained in the Core Surveillance Report, nor will it affect the need for frequent axial power distribution surveillance. The proposed modification will not adversely affect the safe operation of the plant.