

Attachment 2

Proposed Technical Specification Change

North Anna Unit 1

Virginia Electric and Power Company

PLANT SYSTEMS

3/4.7.4 SERVICE WATER SYSTEM

3/4.7.4.1 SERVICE WATER SYSTEM - OPERATING

LIMITING CONDITION FOR OPERATION

- 3.7.4.1 Two service water loops (shared with Unit 2) shall be OPERABLE with each loop consisting of:
- Two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and
 - An OPERABLE flow path capable of providing cooling for OPERABLE plant components and transferring heat to the service water reservoir.

APPLICABILITY: Either Unit in MODES 1, 2, 3, or 4.

- ACTION:
- With one service water pump inoperable, within 72 hours throttle component cooling water heat exchanger flows, in accordance with approved operating procedures, to ensure the remaining service water pumps are capable of providing adequate flow to the recirculation spray heat exchangers.
 - With two service water pumps inoperable, perform ACTION 3.7.4.1.a within 1 hour and restore at least one service water pump to OPERABLE status within 72 hours, or place both units in HOT STANDBY within the next six hours and in COLD SHUTDOWN within the following 30 hours.
 - With one service water loop inoperable, except as provided in ACTION 3.7.4.1.a, restore the inoperable loop to OPERABLE status within 72 hours or place both units in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
 - The allowable time that one of the two service water loops can be inoperable as specified in ACTION 3.7.4.1.c may be extended beyond 72 hours up to 168 hours as part of service water system upgrades* provided 3 out of 4 service water pumps (the third pump does not require auto start capability) and 2 out of 2 auxiliary service water pumps have been OPERABLE since initial entry into the action statement and remain OPERABLE during the extended action statement or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

* Isolation of one service water loop for up to 168 hours is permitted only as part of service water system upgrades. System upgrades include modification and maintenance activities associated with the installation of new discharge headers and spray arrays, mechanical and chemical cleaning of service water piping and valves, pipe repair and replacement, valve repair and replacement, installation of corrosion mitigation measures and inspections of and repairs to buried piping interior coatings and pump or valve house components.

PLANT SYSTEMS

3/4.7.4 SERVICE WATER SYSTEM

3/4.7.4.1 SERVICE WATER SYSTEM - OPERATING

LIMITING CONDITION FOR OPERATION

- e. With two service water loops inoperable for reasons other than described in ACTION 3.7.4.1.b, place both units in HOT SHUTDOWN within 12 hours and within the following hour, initiate actions to place both units in COLD SHUTDOWN and continue actions until both units are in COLD SHUTDOWN.

SURVEILLANCE REQUIREMENTS

- 4.7.4.1 At least two service water loops shall be demonstrated OPERABLE:
 - a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position.
 - b. At least once per 6 months by measurement of the movement of the pumphouse and wing walls.
 - c. At least once per 18 months during shutdown, by:
 - 1. Verifying that each automatic valve servicing safety related equipment actuates to its correct position on an actual or simulated safety injection signal.
 - 2. Verifying that each automatic service water valve actuates to its correct position on an actual or simulated containment high-high signal.
 - d. Each service water pump will be tested in accordance with Specification 4.0.5.

PLANT SYSTEMS

3/4.7.4 SERVICE WATER SYSTEM

3/4.7.4.2 SERVICE WATER SYSTEM - SHUTDOWN

LIMITING CONDITION FOR OPERATION

- 3.7.4.2 One service water loop (shared with Unit 2) shall be OPERABLE consisting of:
- Two OPERABLE service water pumps (or auxiliary service water pumps) with their associated normal and emergency power supplies, and
 - An OPERABLE flow path capable of providing cooling for OPERABLE plant components and transferring heat to the service water reservoir or, if using auxiliary service pumps, to the North Anna reservoir.

APPLICABILITY: Both Units in MODES 5 or 6.

- ACTION:
- With only one service water pump OPERABLE, restore an additional service water pump to OPERABLE status within 12 hours or immediately suspend all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System.
 - With no service water pumps OPERABLE, immediately suspend all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System.

SURVEILLANCE REQUIREMENTS

- 4.7.4.2 At least one service water loop shall be demonstrated OPERABLE:
- At least once per 31 days by verifying that each valve (manual, power operated or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position.
 - At least once per 6 months by measurement of the movement of the pump house and wing walls.
 - Each service water pump will be tested in accordance with Specification 4.0.5.

PLANT SYSTEMS

BASES

3/4.7.1.6 and 3/4.7.2.1.7 STEAM TURBINE and OVERSPEED PROTECTION

The turbine generator at the North Anna facility is arranged in a nonpeninsular orientation. Analysis has shown that this arrangement is such that if a turbine failure occurs as a result of destructive overspeed, potentially damaging missiles could impact the auxiliary building, containment, control room and other structures housing safety related equipment. The requirements of these two specifications provide additional assurance that the facility will not be operated with degraded valve performance and/or flawed turbine material which are the major contributors to turbine failures.

3/4.7.2 STEAM GENERATOR PRESSURE/TEMPERATURE LIMITATION

The limitation on steam generator pressure and temperature ensures that the pressure induced stresses in the steam generators do not exceed the maximum allowable fracture toughness stress limits. The limitations of 70°F and 200 psig are based on average steam generator impact values at 10°F and are sufficient to prevent brittle fracture.

3/4.7.3 COMPONENT COOLING WATER SUBSYSTEM

The OPERABILITY of the component cooling water subsystem ensures that sufficient cooling capacity is available for continued operation of safety related equipment during normal and accident conditions.

PLANT SYSTEMS

BASES

3.4.7.4.1 SERVICE WATER SYSTEM - OPERATING

The OPERABILITY of the service water system ensures that sufficient cooling capacity is available for safety related equipment during normal and accident conditions. The system is designed to meet the assumption of a single failure. During a design basis accident, both loops of service water cross-connect at the affected units recirculation spray heat exchangers to create a single large service water system. The affected units component cooling heat exchangers isolate so that sufficient flows are provided to both the non-affected and affected units components.

With four normal service water pumps OPERABLE, the unthrottled flow resistance of the system is such that greater than design flows are achieved if a single pump or power supply failure occurs following an accident. When three normal service water pumps are OPERABLE, the flow resistance of the system is adjusted to ensure that design flows are achieved if a single pump or power supply failure occurs following an accident. The required resistance is determined during periodic flow balance testing and is obtained by throttling flow through the component cooling water heat exchangers. Rather than marking and specifying exact component cooling water heat exchanger outlet throttle valve positions, operating procedures have been established to set system resistance at or greater than the required resistance. When only two normal service water pumps or a single loop are OPERABLE, the design basis function can still be met provided that the flow resistance of the system is adjusted and no additional failures occur. The allowed outage time of 72 hours is consistent with other LCOs for loss of one train of ESF systems, and is based upon an industry accepted practice considering the low probability of an accident occurring.

If more than two normal service water pumps or both service water loops are inoperable, the units are not prepared to respond to the design bases events for which the service water system is required. Both units must be placed in HOT SHUTDOWN within twelve hours and actions initiated within one hour thereafter to place the units in COLD SHUTDOWN. Twelve hours is a reasonable time based on operating experience to place the units in HOT SHUTDOWN from full power without challenging safety systems or operators. The units may remain in HOT SHUTDOWN until a method to further cool the units becomes available, but actions to develop the method must be started within one hour after reaching HOT SHUTDOWN.

Auxiliary service water pumps are strictly a backup subsystem and are not taken credit for in a design basis accident. However, these pumps are taken credit for in the 10 CFR 50, Appendix R, analysis. Therefore, these pumps are maintained OPERABLE in MODES 1, 2, 3, and 4 to meet these requirements.

PLANT SYSTEMS

BASES

3/4.7.4.2 SERVICE WATER SYSTEM - SHUTDOWN

The OPERABILITY of the service water system when both units are in COLD SHUTDOWN or REFUELING ensures that an adequate heat sink is maintained for the residual heat removal system. Requiring two service water pumps to be OPERABLE is consistent with the residual heat removal system requirements.

If only one service water pump is OPERABLE, an additional service water pump must be restored to an OPERABLE status within 12 hours. If an additional service water pump cannot be restored within the 12 hour time frame, all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System should be immediately suspended.

With no service water pumps OPERABLE, all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System must be immediately suspended.

Attachment 3

Proposed Technical Specification Change
North Anna Unit 2

Virginia Electric and Power Company

PLANT SYSTEMS

3/4.7.4 SERVICE WATER SYSTEM

3/4.7.4.1 SERVICE WATER SYSTEM - OPERATING

LIMITING CONDITION FOR OPERATION

- 3.7.4.1 Two service water loops (shared with Unit 1) shall be OPERABLE with each loop consisting of:
- Two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and
 - An OPERABLE flow path capable of providing cooling for OPERABLE plant components and transferring heat to the service water reservoir.

APPLICABILITY: Either Unit in MODES 1, 2, 3, or 4.

- ACTION:
- With one service water pump inoperable, within 72 hours throttle component cooling water heat exchanger flows, in accordance with approved operating procedures, to ensure the remaining service water pumps are capable of providing adequate flow to the recirculation spray heat exchangers.
 - With two service water pumps inoperable, perform ACTION 3.7.4.1.a within 1 hour and restore at least one service water pump to OPERABLE status within 72 hours, or place both units in HOT STANDBY within the next six hours and in COLD SHUTDOWN within the following 30 hours.
 - With one service water loop inoperable, except as provided in ACTION 3.7.4.1.a, restore the inoperable loop to OPERABLE status within 72 hours or place both units in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
 - The allowable time that one of the two service water loops can be inoperable as specified in ACTION 3.7.4.1.c may be extended beyond 72 hours up to 168 hours as part of service water system upgrades* provided 3 out of 4 service water pumps (the third pump does not require auto start capability) and 2 out of 2 auxiliary service water pumps have been OPERABLE since initial entry into the action statement and remain OPERABLE during the extended action statement or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

* Isolation of one service water loop for up to 168 hours is permitted only as part of service water system upgrades. System upgrades include modification and maintenance activities associated with the installation of new discharge headers and spray arrays, mechanical and chemical cleaning of service water piping and valves, pipe repair and replacement, valve repair and replacement, installation of corrosion mitigation measures and inspections of and repairs to buried piping interior coatings and pump or valve house components.

PLANT SYSTEMS

3/4.7.4 SERVICE WATER SYSTEM

3/4.7.4.1 SERVICE WATER SYSTEM - OPERATING

LIMITING CONDITION FOR OPERATION

- e. With two service water loops inoperable for reasons other than described in ACTION 3.7.4.1.b, place both units in HOT SHUTDOWN within 12 hours and within the following hour, initiate actions to place both units in COLD SHUTDOWN and continue actions until both units are in COLD SHUTDOWN.

SURVEILLANCE REQUIREMENTS

- 4.7.4.1 At least two service water loops shall be demonstrated OPERABLE:
 - a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position.
 - b. At least once per 6 months by measurement of the movement of the pumphouse and wing walls.
 - c. At least once per 18 months during shutdown, by:
 - 1. Verifying that each automatic valve servicing safety related equipment actuates to its correct position on an actual or simulated safety injection signal.
 - 2. Verifying that each automatic service water valve actuates to its correct position on an actual or simulated containment high-high signal.
 - d. Each service water pump will be tested in accordance with Specification 4.0.5.

PLANT SYSTEMS

3/4.2 SERVICE WATER SYSTEM

3/4.7.4.2 SERVICE WATER SYSTEM - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.7.4.2 One service water loop (shared with Unit 1) shall be OPERABLE consisting of:

- a. Two OPERABLE service water pumps (or auxiliary service water pumps) with their associated normal and emergency power supplies, and
- b. An OPERABLE flow path capable of providing cooling for OPERABLE plant components and transferring heat to the service water reservoir or, if using auxiliary service pumps, to the North Anna reservoir.

APPLICABILITY: Both Units in MODES 5 or 6.

- ACTION:
- a. With only one service water pump OPERABLE, restore an additional service water pump to OPERABLE status within 12 hours or immediately suspend all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System.
 - b. With no service water pumps OPERABLE, immediately suspend all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System.

SURVEILLANCE REQUIREMENTS

4.7.4.2 At least one service water loop shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position.
- b. At least once per 6 months by measurement of the movement of the pump house and wing walls.
- c. Each service water pump will be tested in accordance with Specification 4.0.5.

PLANT SYSTEMS

BASES

3/4.7.1.6 and 3/4.7.7.1.7 STEAM TURBINE and OVERSPEED PROTECTION

The turbine generator at the North Anna facility is arranged in a nonpeninsular design. Analysis has shown that this arrangement is such that if a turbine failure occurs as a result of destructive overspeed, potentially damaging missiles could impact the auxiliary building, containment, control room and other structures housing safety related equipment. The design of these two specifications provide additional assurance that the facility will not be affected with degraded valve performance and/or flawed turbine material which are the major contributors to turbine failures.

3/4.7.2 STEAM GENERATOR PRESSURE/TEMPERATURE LIMITATION

The limitation on steam generator pressure and temperature ensures that the pressure induced stresses in the steam generators do not exceed the maximum allowable fracture toughness stress limits. The limitations of 70°F and 200 psig are based on average steam generator impact values at 10°F and are sufficient to prevent brittle fracture.

3/4.7.3 COMPONENT COOLING WATER SUBSYSTEM

The OPERABILITY of the component cooling water subsystem ensures that sufficient cooling capacity is available for continued operation of safety related equipment during normal and accident conditions.

PLANT SYSTEMS

BASES

3/4.7.4.1 SERVICE WATER SYSTEM - OPERATING

The OPERABILITY of the service water system ensures that sufficient cooling capacity is available for safety related equipment during normal and accident conditions. The system is designed to meet the assumption of a single failure. During a design basis accident, both loops of service water cross-connect at the affected units recirculation spray heat exchangers to create a single large service water system. The affected units component cooling heat exchangers isolate so that sufficient flows are provided to both the non-affected and affected units components.

With four normal service water pumps OPERABLE, the unthrottled flow resistance of the system is such that greater than design flows are achieved if a single pump or power supply failure occurs following an accident. When three normal service water pumps are OPERABLE, the flow resistance of the system is adjusted to ensure that design flows are achieved if a single pump or power supply failure occurs following an accident. The required resistance is determined during periodic flow balance testing and is obtained by throttling flow through the component cooling water heat exchangers. Rather than marking and specifying exact component cooling water heat exchanger outlet throttle valve positions, operating procedures have been established to set system resistance at or greater than the required resistance. When only two normal service water pumps or a single loop are OPERABLE, the design basis function can still be met provided that the flow resistance of the system is adjusted and no additional failures occur. The allowed outage time of 72 hours is consistent with other LCOs for loss of one train of ESF systems, and is based upon an industry accepted practice considering the low probability of an accident occurring.

If more than two normal service water pumps or both service water loops are inoperable, the units are not prepared to respond to the design bases events for which the service water system is required. Both units must be placed in HOT SHUTDOWN within twelve hours and actions initiated within one hour thereafter to place the units in COLD SHUTDOWN. Twelve hours is a reasonable time based on operating experience to place the units in HOT SHUTDOWN from full power without challenging safety systems or operators. The units may remain in HOT SHUTDOWN until a method to further cool the units becomes available, but actions to develop the method must be started within one hour after reaching HOT SHUTDOWN.

Auxiliary service water pumps are strictly a backup subsystem and are not taken credit for in a design basis accident. However, these pumps are taken credit for in the 10 CFR 50, Appendix R, analysis. Therefore, these pumps are maintained OPERABLE in MODES 1, 2, 3, and 4 to meet these requirements.

PLANT SYSTEMS

BASES

3/4.7.4.2 SERVICE WATER SYSTEM - SHUTDOWN

The OPERABILITY of the service water system when both units are in COLD SHUTDOWN or REFUELING ensures that an adequate heat sink is maintained for the residual heat removal system. Requiring two service water pumps to be OPERABLE is consistent with the residual heat removal system requirements.

If only one service water pump is OPERABLE, an additional service water pump must be restored to an OPERABLE status within 12 hours. If an additional service water pump cannot be restored within the 12 hour time frame, all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System should be immediately suspended.

With no service water pumps OPERABLE, all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System must be immediately suspended.

Attachment 4

10 CFR 50.92, No Significant Hazards Consideration

North Anna Units 1 and 2

Virginia Electric and Power Company

No Significant Hazards Considerations Evaluation

The proposed changes are being made as a result of an NRC violation regarding the service water system. In the Notification of Violation (dated February 1, 1991) the NRC identified that the operating procedures for the service water system were inadequate by not ensuring design basis flows to the recirculation spray heat exchangers during periods when a service water pump is inoperable. In our response to the Notice of Violation (dated March 1, 1991) we committed to changes to the Technical Specifications to clarify the service water system operability requirements.

The proposed changes enhance the availability of the service water system and ensure design basis flows are available to the recirculation spray heat exchangers. The proposed changes further ensure the availability of shutdown cooling by requiring one OPERABLE service water loop when both units are in Modes 5 or 6.

The Limiting Condition for Operation of Technical Specification 3.7.4.1 is changed to define what constitutes an operable service water loop. Each service water loop must contain two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and an OPERABLE flow path capable of providing cooling for OPERABLE plant components and transferring heat to the service water reservoir to ensure design basis flows are achievable.

The Applicability statement of Technical Specification 3.7.4.1 is changed to clarify that this Technical Specification applies if either unit is in mode 1 through 4. This change will ensure that sufficient cooling capacity is available for both units during power operation.

Action statement 3.7.4.1.a is added to require that if one of the four required normal service water pumps becomes inoperable, that component cooling heat exchanger service water flows must be throttled, within 72 hours, to ensure that the normal service water pumps remain capable of providing design basis flows to the recirculation spray heat exchangers. This allows design basis flows to be delivered by two normal service water pumps with the failure of the third OPERABLE normal service water pump.

Action statement 3.7.4.1.b is added to require that if two of the four required service water pumps become inoperable Action 3.7.4.1.a must be performed within one hour. Performing this action ensures the design basis flows can be met if no subsequent pump failures occur. In addition, at least one service water pump must be restored to OPERABLE status within 72 hours, or both units shall be placed in HOT STANDBY within the next six hours and in COLD SHUTDOWN within the following 30 hours.

Action statement 3.7.4.1.c was modified to add the phrase "except as provided in 3.7.4.1.a" for clarification. In addition, this action statement was changed to clarify that the inoperable loop must be returned to OPERABLE status within six hours or both units will be placed in HOT STANDBY.

Action statement 3.7.4.1.d was modified to allow not having auto start capability on the third normal service water pump and require 2 out of 2 auxiliary service water pumps to be OPERABLE. Not requiring the third normal service water pump to have an auto-start capability is considered a clarification of the current Technical Specification and is needed to protect the normal service water pumps from a low flow condition when the three pumps are aligned to the same supply header. The probabilistic risk assessment that was performed for the original amendment only required that the pump be available for service. Requiring 2 out of 2 auxiliary service water pumps will provide for a complete backup system to be available and will ensure that a manually initiated backup system exists which can deliver design basis flows during an accident condition. In addition, the footnote for this action statement was modified to include the service water valve house.

Action statement 3.7.4.1.e is added to require that if both service water loops become inoperable, that both units must be placed in HOT SHUTDOWN within the next 12 hours and that actions be initiated to place both units in COLD SHUTDOWN within the next hour and continue to COLD SHUTDOWN. With two service water loops inoperable, the units are not prepared to respond to the design basis events for which the service water system is required. The units must be placed in a mode in which the risk to the unit and to the environment is minimized. Depending on the actual state of the service water system, the recirculation spray heat exchangers may not have a safety-grade heat sink and the unit should be placed in HOT SHUTDOWN, a condition where decay heat can be removed by the steam generators.

The action to place both units in HOT SHUTDOWN and continue actions until both units are in COLD SHUTDOWN addresses the condition if the service water system is unavailable to perform its intended function. In this situation, the unit may remain in HOT SHUTDOWN until a method to further cool the units becomes available.

Surveillance Requirement 4.7.4.1.c(2) was modified to clarify that the automatic service water valves should be verified to be in the correct position on a actual or simulated containment high-high signal.

Surveillance Requirement 4.7.4.1.d was added to specify surveillance testing for OPERABILITY determination of the service water pumps in accordance with Specification 4.0.5, the AMSE Section XI program.

Technical Specification 3.7.4.2 was added to support the UFSAR design bases for both units in Modes 3 or 6. When both units are in COLD SHUTDOWN or REFUELING the design basis requires that the service water system be OPERABLE. This is to ensure an adequate heat sink is maintained for the residual heat removal system.

The requirements for Modes 5 and 6 differ from Specification 3.7.4.1 by requiring that one service water loop be OPERABLE. Service water is required to provide a heat sink for the residual heat removal system to remove decay heat from the reactor core. However, there is a significant reduction in potential heat loading on the service water system. Therefore, only one service water loop is required to be OPERABLE. The components required for one loop to be OPERABLE are the same as defined in Specification 3.7.4.1 except that credit for the OPERABLE auxiliary service water pump

may be taken to satisfy the OPERABILITY requirement of the LCO. This allows removing the service water reservoir from service for maintenance and utilizing the Lake Anna reservoir as the heat sink for core heat removal. Requiring that two service water pumps be OPERABLE allows for a single pump or power failure while still providing the heat sink for the residual heat removal system. This is consistent with the residual heat removal system requirements.

Action Statement 3.7.4.2.a requires that if there is only one OPERABLE service water pump, at least one inoperable service water pump must be restored to OPERABLE status within 12 hours. This is consistent with the action requirements for a partial loss of residual heat removal capability during shutdown conditions.

Action Statement 3.7.4.2.b requires that if no service water pumps are OPERABLE, all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System must be immediately suspended because a total loss of shutdown cooling may have occurred. This is consistent with the action requirements for a total loss of residual heat removal capability during shutdown conditions.

Surveillance requirements to demonstrate the OPERABILITY of one service water loop are proposed for Technical Specification 3.7.4.2.

The existing bases section (3/4.7.4) was expanded to provide a more detailed description of the service water system. This bases section was also split to provide a description for operating and shutdown conditions (3/4.7.4.1 and 3/4.7.4.2, respectively).

It has been determined that the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92. This determination was based on the following points.

1. **Accident Probability or Consequence Increase.** The proposed changes have no adverse impact upon potential accident probability or consequence. The proposed changes enhance the availability of the service water system and ensure design basis flows are available to the recirculation spray heat exchangers. The proposed changes further ensure the availability of shutdown cooling by requiring one OPERABLE service water loop when both units are in Modes 5 or 6. No new or unique accident precursors are introduced by these changes to the Technical Specification requirements. In fact, the clarification of the Technical Specifications to accurately portray the current design basis for the service water system will decrease any potential accident probability or consequence that may occur as a result of inaccurate or incomplete information that may be currently in the Technical Specifications.

Likewise, the consequences of the accidents will not increase as a result of the proposed Technical Specification changes.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Accident Probability Creation.** The proposed changes to the Technical Specifications constitutes additional limitations not presently included in the Technical Specifications thereby making the Technical Specifications more stringent. The proposed changes enhance the availability of the service water system and ensure design basis flows are available to the recirculation spray heat exchangers. The proposed changes further ensure the availability of shutdown cooling by requiring one OPERABLE service water loop when both units are in Modes 5 or 6. Operation with these changes does not create probability for any accident which has not already been evaluated in the Updated Final Safety Analysis Report (UFSAR). In fact, these changes are to modify the Technical Specifications to be consistent with the design basis. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. **Safety Margin Reduction.** The results of the UFSAR accident analyses continue to bound operation under the proposed changes. The proposed changes enhance the availability of the service water system and ensure design basis flows are available to the recirculation spray heat exchangers. The proposed changes further ensure the availability of shutdown cooling by requiring one OPERABLE service water loop when both units are in Modes 5 or 6. The proposed changes to the Technical Specifications ensure consistency with the UFSAR design basis and result in additional limitations not currently included in the Technical Specifications. Therefore, the Margins of Safety are maintained without reduction.

Based on the above significant hazards consideration evaluation, Virginia Electric and Power Company concludes that the activities associated with this proposed Technical Specification change satisfies the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.