

ATTACHMENT 1

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## ADMINISTRATIVE CONTROLS

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### MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the Reactor Coolant System PORVs or safety valves, shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office of Inspection and Enforcement, no later than the 15th of each month following the calendar month covered by the report.

### REPORTABLE OCCURRENCES

6.9.1.7 The REPORTABLE OCCURRENCES of Specification 6.9.1.8 and 6.9.1.9 below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and references shall be made to the original report date.

### PROMPT NOTIFICATION WITH WRITTEN FOLLOWUP

6.9.1.8 The types of event listed below shall be reported within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the Regional Office, or his designate no later than the first working day following the event, with a written followup report within 14 days. The written followup report shall include, as a minimum, a completed copy of a 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. Failure of the reactor protection system or other systems subject to limiting safety-system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint specified as the limiting safety-system setting in the technical specifications or failure to complete the required protective function.

ATTACHMENT 2

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- b. The complete results of the steam generator tube inservice inspections performed during the report period (Reference Specification 4.4.5.5.b.).

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ATTACHMENT 3

## DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGE

Challenges to the PORVs or safety valves are reportable in the Monthly Operating Report as required by North Anna 1 and 2 Technical Specification 6.9.1.6. This proposed Technical Specification change adds the words Reactor Coolant System to describe challenges to the PORVs or safety valves referenced in Technical Specification 6.9.1.6.

Technical Specifications 3.4.2, 3.4.3.1, 3.4.3.2 and 3.4.9.3 are all related to Reactor Coolant System PORVs or safety valves. This proposed change is to clarify and provide consistency for reporting challenges to the Reactor Coolant System PORVs or safety valves in the reporting requirements of the Monthly Operating Report.

This proposed change is administrative in nature and does not pose any danger to the safe operation of the plant and/or public health. This proposed change does not pose a significant hazards consideration as stated in the Federal Register, dated April 6, 1983, Page 14870, Example (i); a purely administrative change to the Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications.

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