

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 8, 1992

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 92-392
NAPS/RMN
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATION CHANGES

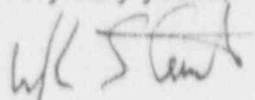
Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications, to Operating License Numbers NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively. The proposed change will revise the current Technical Specifications to permit staggered testing of the Reactor Trip System instrumentation and to permit up to two hours to test certain Emergency Safeguards Feature Actuation System instrumentation. Some minor administrative changes are also included.

A discussion of the proposed changes is provided in Attachment 1. The proposed changes are presented in Attachment 2 for Units 1 and 2, respectively.

This request has been reviewed by the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee. It has been determined that this request does not involve an unreviewed safety question as defined in 10 CFR 50.59 or a significant hazards consideration as defined in 10 CFR 50.92. The basis for our determination that no significant hazards consideration is involved is presented in Attachment 3.

Should you have any questions or require additional information, please contact us at your earliest convenience.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

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ADD 1

Attachments

1. Discussion of Proposed Changes
2. Proposed Technical Specification Change for North Anna Units 1 and 2
3. 10 CFR 50.92 Significant Hazards Consideration

cc: U.S. Nuclear Regulatory Commission
Region II
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Mr. M. S. Lesser
NRC Senior Resident Inspector
North Anna Power Station

Commissioner
Department of Health
Room 400
109 Governor Street
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COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by W. L. Stewart who is Senior Vice President - Nuclear, of Virginia Electric and Power Company. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 8TH day of June, 1992.

My Commission Expires: May 31, 1994.

Vicki L. Hull
Notary Public

(SEAL)

Attachment 1

Discussion of Proposed Changes

North Anna Units 1 and 2

Virginia Electric and Power Company

DISCUSSION OF PROPOSED CHANGES

Introduction

The proposed changes described herein are being made to Technical Specification 4.3.1.1.1, "Reactor Trip System Instrumentation," Table 4.3-1, Item 19 and Technical Specification 3.3.2.1, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," Table 3.3-3, Action 20. Currently, Table 4.3-1, Item 19 requires that the Safety Injection Input from ESF logic function be tested on a monthly basis. The proposed change will add Notation 5 and increase the surveillance interval from monthly (every 31 days) to every 62 days on a staggered test basis. Table 3.3-3, Action 20 allows bypassing one channel for testing purposes for one hour. The proposed change will increase the time that a channel may be bypassed for testing purposes from one to two hours.

The proposed changes also include administrative changes to the Technical Specifications. These changes serve to clarify the Technical Specification requirements and do not change the technical content.

Background

There are two trains of Reactor Trip System and ESFAS instrumentation. The two trains of instrumentation are verified operable by performing surveillance procedures PT-36.1A and PT-36.1B, "Solid State Protection System Test." These tests place one train of the Solid State Protection System (SSPS) in bypass and test the inputs and outputs to ensure that the train is operable. Specifically, the Safety Injection Input from ESF, Auxiliary Feedwater Pump Start Automatic Actuation Logic and Steam Line Isolation Automatic Actuation Logic functions are proven operable by these tests.

Technical Specification 3.3.1.1 requires that the Reactor Trip System instrumentation channels and interlocks of Table 3.3-1 be operable with response times as shown in Table 3.3-2. The Safety Injection Input from ESF function is part of the Reactor Trip System instrumentation.

Recently, we conducted a review to ensure that surveillance requirements are incorporated into appropriate surveillance test procedures. During this review, we determined that Technical Specification 4.3.1.1.1 requires testing both trains of Safety Injection Input from ESF logic each month. Since that time, both trains of SSPS have been tested each month in order to meet the surveillance requirement.

Technical Specification 3.3.2.1 requires that the ESFAS instrumentation channels shown in Table 3.3-3 are operable with the trip setpoints set consistent with the values shown in the trip setpoint column of Table 3.3-4 and with response times as shown in Table 3.3-5. The Auxiliary Feedwater Pump Start Automatic Actuation Logic and the Steam Line Isolation Automatic Actuation Logic functions are part of the ESFAS instrumentation. It was determined during a recent review that Table 3.3-3, Action 20 did not allow adequate time to perform the required monthly testing of either the Auxiliary Feedwater Pump Start Automatic Actuation Logic function for Units 1 and 2 or the Steam Line Isolation Automatic Actuation Logic function for Unit 2. (Table 3.3-3 does permit sufficient time (i.e., two hours) when testing the Steam Line Isolation Automatic Actuation Logic function for Unit 1, and therefore, no change is required.)

Technical Specification Changes

General

The Technical Specification changes described herein apply to North Anna Units 1 and 2, unless otherwise stated.

Technical Specification 4.3.1.1.1, Table 4.3-1, Item 19

This change will modify Technical Specification 4.3.1.1.1, Reactor Trip System Instrumentation, Table 4.3-1, Item 19, Safety Injection Input from ESF, to increase the surveillance interval from monthly (every 31 days) to every 62 days on a staggered test basis. This is accomplished by adding Notation 5, which states "Each train or logic channel shall be tested at least every 62 days on a STAGGERED TEST BASIS," to Item 19.

The change is consistent with the requirements for the rest of the SSPS and is more stringent than the requirements of NUREG 0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors, Revision 4. Before the review indicated the need to perform testing on both trains each month, all testing for the SSPS was performed on a staggered test basis frequency. The frequency at which the SSPS is now being tested increases the possibility of inadvertent actuations and decreases the amount of time that both trains of SSPS are operable. Testing on a staggered test basis is adequate to ensure the continued reliability of the system, limit the possibility of inadvertent actuations, and maximize the amount of time that both trains of SSPS are operable.

Technical Specification 4.3.1.1.1, Table 4.3-1, Items 21 and 22

The word "and" has been changed to "&" in several places for consistency.

Technical Specification 3.3.2.1, Table 3.3-3, Action 17

The statement consists of two independent statements that have been spliced together with a comma. This change will substitute a period for the comma and capitalize the next word.

Technical Specification 3.3.2.1, Table 3.3-3, Action 19

The word "requirements" is changed to singular to agree with the verb.

Technical Specification 3.3.2.1, Table 3.3-3, Action 20

This change will modify Technical Specification 3.3.2.1, Table 3.3-3, Action 20, to allow a channel to be bypassed for up to two hours for testing purposes.

The monthly channel functional test requirement is met by implementing surveillance procedures PT-36.1A and PT-36.1B, Solid State Protection System Test. These tests place one train of SSPS in bypass and test the different inputs and outputs to ensure that the system is operable. During the time that the inputs and outputs are bypassed, the channel is inoperable. One of the actions that must be entered during this time frame is Action 20. Action 20 states that "With the number of OPERABLE Channels one less than the Total Number of Channels, be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 1 hour for surveillance testing per Technical Specification 4.3.2.1.1 provided the other channel is OPERABLE." However, the entire channel functional test takes between one and two hours to complete.

The proposed change is consistent with Table 3.3-3, Action 22, of NUREG 0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors, Revision 4. Action 22 allows the Auxilliary Feedwater Pump Start Automatic Actuation Logic and the Steam Line Isolation Automatic Actuation Logic functions to be bypassed for up to two hours when testing in accordance with Technical Specification 4.3.2.1.1. In addition, the NRC has previously issued guidance that it is not desired to knowingly perform maintenance or a surveillance which will require entering an action statement that would cause a unit to shut down.

The change also converts "WITHIN" to lower case letters for Unit 1 only because it is not a defined term.

Technical Specification 3.3.2.1, Table 3.3-3, Action 21

This change will insert "the next" after "HOT STANDBY within" to clarify the fact that the six hours to HOT STANDBY starts after the 48 hours to restore the channel ends. This does not change the intent of the requirement.