

MAR 15 1983

Docket Nos. 50-280  
and 50-281

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NRC PDR JHeltemes  
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ELJordan  
JMTaylor  
TBarnhart-8  
ACRS-10  
OPA

Mr. W. L. Stewart  
Vice President - Nuclear Operations  
Virginia Electric and Power Company  
Post Office Box 26666  
Richmond, Virginia 23261

Dear Mr. Stewart:

The Commission has issued the enclosed Order confirming your commitments to implement those post-TMI related items set forth in NUREG-0737 for which the staff requested completion on or after July 1, 1981. This Order is based on commitments contained in your letters responding to the NRC's Generic Letters 82-05 and 82-10 dated March 17, 1982 and May 5, 1982, respectively.

The Order references your letters and, in its Attachments, contains lists of the applicable NUREG-0737 items with your schedular commitments. As discussed in the Order, several of the items listed in Generic Letter 82-10 will be handled outside of this Order.

The Commission's intention when it issued NUREG-0737 was that items would be completed in accordance with the staff's recommended schedule. However, our evaluation of your proposed schedule exceptions concludes that the proposed delays are acceptable. Among other things, the Order requires implementation of these items in accordance with your proposed schedule.

Some of the items set forth in the Attachments to the Order are subject to post implementation review and inspection. Our post implementation review and/or the development of Technical Specifications may identify alterations to your method of implementing and maintaining the requirements. Any identified alterations will be the subject of future correspondence.

A copy of this Order is being filed with the Office of the Federal Register for publication.

Sincerely,

Original signed by:  
S. A. Varga

Steven A. Varga, Chief  
Operating Reactors Branch #1  
Division of Licensing

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PDR ADOCK 05000280  
P PDR

Enclosure:  
Order

cc w/enclosure:

*op 2/16/83*  
*from 2/16/83*

*P/D*  
*DEisenhut*  
*11/15/82*

OFFICE	See next page	ORB#1:DL	ORB#1:DL	ORB#1:DL	ORAB	AD/OR:DL	OELD
SURNAME		CParrish	DNeighbors:dm	SVarga		GLainas	
DATE		11/21/82	11/21/82	11/21/82	3/14/83	11/17/83	3/14/83

Mr. W. L. Stewart  
Virginia Electric and Power Company

cc: Mr. Michael W. Maupin  
Hunton and Williams  
Post Office Box 1535  
Richmond, Virginia 23213

Mr. J. L. Wilson, Manager  
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Surry, Virginia 23883

Donald J. Burke, Resident Inspector  
Surry Power Station  
U. S. Nuclear Regulatory Commission  
Post Office Box 166  
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Mr. Sherlock Holmes, Chairman  
Board of Supervisors of Surry County  
Surry County Courthouse, Virginia 23683

Attorney General  
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Richmond, Virginia 23219

Mr. James R. Wittine  
Commonwealth of Virginia  
State Corporation Commission  
Post Office Box 1197  
Richmond, Virginia 23209

Regional Radiation Representative  
EPA Region III  
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Mr. J. H. Ferguson  
Executive Vice President - Power  
Virginia Electric and Power Company  
Post Office Box 26666  
Richmond, Virginia 23261

James P. O'Reilly  
Regional Administrator - Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303



additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and schedule for implementation are set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

- (1) For applicable items that have been completed, confirmation of completion and the date of completion, (2) for items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and (3) justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

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## III.

Virginia Electric and Power Company responded to Generic Letter 82-05 by letters dated April 16, May 17, June 18, June 23, August 23, October 1, December 27 and 29, 1982, and March 1 and March 11, 1983; the licensee responded to Generic Letter 82-10 by letters dated May 24, June 30, July 17 and November 16, 1982. In these submittals, the licensee confirmed that some of the items identified in the Generic Letters had been completed and made firm commitments to complete the remainder. The attached Tables summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

There are six items from Generic Letter 82-10 that, as noted in the Table (Attachment 2), have licensee schedules to be determined and are therefore not included in this Order. Some of the items addressed in this Order are considered by the licensee to be completed or to require no modifications. The staff's evaluation of the licensee's delays for the remaining items is provided herein:

## II.B.3 Post Accident Sampling

This item will be delayed by the licensee and will be completed by June 1, 1983. At present, all sampling and analysis equipment is installed. The schedule extension is required because the installation of permanent supply and sample lines is delayed by the need to redesign and reroute portions of the lines to accommodate recent concerns associated with iodine plateout and

equipment problems. Also, there have been procurement difficulties with the heat tracing materials and control circuitry. The interim sampling procedure required by the short-term TMI requirements will be in effect until the permanent system is operational.

#### Item II.D.1.2 RV and SV Test Programs

The licensee has submitted a plant-specific assessment regarding adequacy of the installed safety and relief valves and block valves. The discharge piping evaluations for Surry depend on the results obtained from North Anna evaluations which were submitted December 21, 1982. The licensee has committed to complete the Surry evaluations by December 31, 1983.

#### II.E.1.2 Auxiliary Feedwater (AFW) Initiation and Flow Indication

All requirements for part 1 of Item II.E.1.2, automatic initiation, have been closed out for Unit No. 1 with the exception of the requirement for bypass indication for the motor-driven AFW pumps. Completion of part 1 exceeds the implementation date of July 1, 1981, as a result of clarification of the bypass indication requirement subsequent to the NRC staff/consultant submittals. This item will be completed during the next refueling outage for Unit No. 1. In the interim, indication will be determined by switch position and light status.

#### II.F.1 Accident Monitoring

Parts 1 and 2 deal with noble gas, iodine and particulate monitoring. Installation is complete except for an electric heat tracing system and startup testing for the Process and Vent Effluent Monitoring System,

and the in-situ calibration and startup testing of the Steam Driven Auxiliary Feedwater Pump Exhaust Effluent Monitoring System. The schedule is extended to accommodate delays in the heat tracing system delivery. The new date for completion is March 1, 1983. The effluent monitoring system installed for the short-term TMI will be used as an interim measure until this permanent system is operational.

Part 3 deals with the Containment High Range Radiation Monitors. The containment range monitor has been calibrated at the vendor plant and the system has been installed and tested. However, the licensee does not consider the system to be operational until such time that a final in-situ calibration has been completed. A prototype calibration source has been developed by the vendor and will be available by March 1983. The licensee is in the process of procuring the prototype calibration source so that a final in-situ calibration will be completed during a fall maintenance outage currently scheduled to be completed on October 15, 1983 for Unit 1 and November 30, 1983 for Unit 2.

Part 6 deals with Containment Hydrogen Monitors, which are installed and tested but are not connected to permanent sample supply and return lines. The slip to April 15, 1983 is due to delays in procurement of a qualified heat trace system. In the interim, the new hydrogen analyzers will be utilized by connecting them to existing containment air sample lines.

**Item III.D.3.4 Control Room Habitability Requirements**

Due to long lead times on procurement of materials, modifications to the control room will be complete by December 31, 1983.

We find, based on the above evaluation, that: 1) the licensee has taken corrective actions regarding the delays and has made a responsible effort to implement the NUREG-0737 requirements noted; 2) there is good cause for the several delays (unexpected design complexity, interface problems, and equipment delays); and 3) as noted above, interim compensatory measures have been provided.

In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and, therefore, the licensee's commitment should be confirmed by Order.

**IV.**

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT THE LICENSEE SHALL:

Implement and maintain the specific items described in the Attachments to this Order in the manner described in the licensee's submittals noted in Section III herein no later than the dates in the Attachments.

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v.

The licensee may request a hearing on this Order within 20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether the licensee should comply with the requirements set forth in Section IV of this Order. This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Purple, Deputy Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,  
this 15th day of March, 1983.

Attachments:

1. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-05
2. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-10

PLANT NAME: Surry Power Station,  
Unit Nos. 1 and 2

LICENSEE COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS  
FROM GENERIC LETTER 82-05

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)
II.F.1	Accident Monitoring	1/1/82	(1) Install noble gas effluent monitors.	March 1, 1983
		1/1/82	(2) Provide capability for effluent monitoring of iodine.	March 1, 1983
		1/1/82	(3) Install in-containment radiation-level monitor.	Fall maintenance outages scheduled to be completed for Unit 1 (October 15, 1983) & Unit 2 (November 30, 1983)
		1/1/82	(4) Provide continuous indication of containment pressure.	Complete
		1/1/82	(5) Provide continuous indication of containment water level.	Complete
		1/1/82	(6) Provide continuous indication of hydrogen concentration in containment.	April 15, 1983

LICENSEE COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-10

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS) *
I.A.1.3.1	Limit Overtime	10/1/82 per Gen. Ltr. 82-12 dtd. 6/15/82	Revise administrative procedures to limit overtime in accordance w/NRC Policy Statement issued by Gen. Ltr. No. 82-12, dtd. June 15, 1982.	Complete
I.A.1.3.2	**Minimum Shift Crew	To be superseded by Proposed Rule.	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units.	To be addressed when Final Rule is issued.
I.C.1	**Revise Emergency Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability.	To be determined.
II.D.1.2	RV and SV Test Programs	7/1/82	Submit plant specific rpt on relief and safety valve program	December 31, 1983
II.D.1.3	Block Valve Test Program	7/1/82	Submit report of results of test program.	Complete
II.K.3.30 & 31	**SBLOCA Analysis	1 yr. after staff approval of model.	Submit plant specific analyses.	To be determined following staff approval of model.
III.A.1.2	**Staffing Levels for Emergency Situations	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined.
III.A.1.2	**Upgrade Emergency Support Facilities	""	""	""
III.A.2.2	**Meteorological Data	""	""	""
III.D.3.4	Control Room Habitability	To be determined by licensee	Modify facility as identified by licensee study	December 31, 1983

\*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

\*\*Not Part of Confirmatory Order