



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 24, 1980

Docket Nos. 50-280
and 50-281

Mr. J. H. Ferguson
Executive Vice President - Power
Virginia Electric and Power Company
Post Office Box 26666
Richmond, Virginia 23261

Dear Mr. Ferguson:

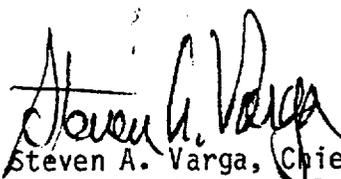
SUBJECT: ORDERS FOR MODIFICATION OF LICENSES CONCERNING ENVIRONMENTAL
QUALIFICATION OF SAFETY-RELATED ELECTRICAL EQUIPMENT

Ref. (a) Commission Memorandum and Order of May 23, 1980 (80-CLI-21)
Ref. (b) Inspection and Enforcement Bulletin Supplement No. 2 to
IEB-79-01B, September 30, 1980.

This letter transmits Orders for Modification of Licenses which change the Technical Specifications for Surry Power Station, Unit Nos. 1 and 2. This change is a result of Ref. (a) which required the staff to codify the documentation requirements for the qualification of safety-related electrical equipment. A copy of the Orders is being filed with the Office of the Federal Register for publication.

The deadline of November 1, 1980 for submittal of the qualification information is not changed by these Orders. Some additional information regarding the file is contained in Ref. (b). Questions regarding these Orders should be directed through your Project Manager.

Sincerely,


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

Enclosure:
Orders

cc: w/enclosure
See Next Page

Mr. J. H. Ferguson
Virginia Electric and Power Company - 2 -

October 24, 1980

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

Mr. J. L. Wilson, Manager
P. O. Box 315
Surry, Virginia 23883

Swem Library
College of William and Mary
Williamsburg, Virginia 23185

Donald J. Burke, Resident Inspector
Surry Power Station
U. S. Nuclear Regulatory Commission
Post Office Box 959
Williamsburg, Virginia 23185

Mr. Sherlock Holmes, Chairman
Board of Supervisors of Surry County
Surry County Courthouse, Virginia 23683

Commonwealth of Virginia
Council on the Environment
903 Ninth Street Office Building
Richmond, Virginia 23219

Attorney General
1101 East Broad Street
Richmond, Virginia 23219

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

Director, Technical Assessment Division
Office of Radiation Programs (AW-459)
U. S. Environmental Protection Agency
Crystal Mall #2
Arlington, Virginia 20460

U. S. Environmental Protection Agency
Region III Office
ATTN: EIS COORDINATOR
Curtis Building - 6th Floor
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
VIRGINIA ELECTRIC AND POWER COMPANY }
(Surry Power Station, Unit No. 1) }

Docket No. 50-280

ORDER FOR MODIFICATION OF LICENSE

I.

Virginia Electric and Power Company (the licensee) is the holder of Facility Operating License No. DPR-32, which authorizes the operation of the Surry Power Station, Unit No. 1 at steady state reactor power levels not in excess of 2441 megawatts thermal (rated power). The facility consists of a pressurized water reactor located at the licensee's site in Surry County, Virginia.

II.

On November 4, 1977, the Union of Concerned Scientists (UCS) filed with the Commission a "Petition for Emergency and Remedial Relief." The petition sought action in two areas: fire protection for electrical cables, and environmental qualification of electrical components. By Memorandum and Order dated April 13, 1978 (7 NRC 400), the Commission denied certain aspects of the petition and, with respect to other aspects, ordered the NRC staff to take several related actions. UCS filed a Petition for Reconsideration on May 2, 1978. By Memorandum and Order, dated May 23, 1980, the Commission reaffirmed its April 13, 1978 decision regarding the possible shutdown of operating reactors. However, the Commission's May 23, 1980 decision directed licensees and the NRC staff to undertake certain actions.

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With respect to environmental qualification of safety-related electrical equipment, the Commission determined that the provisions of the two staff documents - the Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines) and NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," December 1979 (copies attached) "form the requirements which licensees and applicants must meet in order to satisfy those aspects of 10 CFR Part 50, Appendix A General Design Criterion (GDC-4), which relate to environmental qualifications of safety-related electrical equipment." The Commission directed, for replacement parts in operating plants, "unless there are sound reasons to the contrary, the 1974 standard in NUREG-0588 will apply." The Commission also directed the staff to complete its review of the information sought from licensees by Bulletin 79-01B¹ and to complete its review of environmental qualification of safety-related electrical equipment in all operating plants, including the publication of Safety Evaluation Reports, by February 1, 1981. The Commission imposed a deadline that, "by no later than June 30, 1982 all safety-related electrical equipment in all operating plants shall be qualified to the DOR Guidelines or NUREG-0588."

¹ Bulletin 79-01B was not sent to licensees for plants under review as part of the staff's Systematic Evaluation Program. The information sought by Bulletin 79-01B was requested from these licensees by a series of letters and meetings during the months of February and March, 1980.

The Commission requested the staff to, "keep the Commission and the public apprised of any further findings of incomplete environmental qualification of safety-related electrical equipment, along with corrective actions taken or planned," and requested the staff to provide bi-monthly progress reports to the Commission.

The Commission further directed that, "In order to leave no room for doubt on this issue, the staff is to prepare additional Technical Specifications for all operating plants which codify the documentation requirement paragraph of the Guidelines (paragraph 8.0)." The staff was directed to add these documentation requirements to each license after they were approved by the Commission.

The Commission also pointed out that the various deadlines imposed in its Order, "do not excuse a licensee from the obligation to modify or replace inadequate equipment promptly."

III.

The Commission has approved the Technical Specification provisions set forth in Section IV below which specify documentation requirements and which specifically impose on the licensee the requirement of the Commission's May 23, 1980 Memorandum and Order that by no later than June 30, 1982 all safety-related electrical equipment shall be qualified to the DOR Guidelines or NUREG-0588.

The information developed during the Commission review of the UCS Petition emphasizes the importance of prompt completion of the upgrading of

environmental qualification of safety-related electrical equipment to conform to the DOR Guidelines or NUREG-0588 and of adequate documentation of equipment qualifications. The deadlines set forth in the Commission's Memorandum and Order dated May 23, 1980, assure that such upgrading will be accomplished promptly. In order to assure prompt completion of necessary qualification work or replacement of unqualified components, if necessary, in conformance with the requirements of the Commission's Memorandum and Order dated May 23, 1980, and to provide complete and adequate documentation as promptly as possible, such upgrading and documentation work must commence immediately. Therefore, I have concluded that the public health, safety and interest require this Order for Modification of License to be effective immediately.

IV.

Accordingly, pursuant to the Atomic Energy Act of 1954, as amended, and the Commission's Rules and Regulations in 10 CFR Parts 2 and 50, IT IS ORDERED THAT EFFECTIVE IMMEDIATELY Facility Operating License No. DPR-32 is hereby amended to add the following provisions to the Appendix A Technical Specifications.

- (a) "By no later than June 30, 1982, all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588, "Interim Staff Position on Environmental

Qualification of Safety-Related Electrical Equipment," December 1979. Copies of these documents are attached to Order for Modification of License No. DPR-32 dated October 24, 1980.

- (b) "By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified."

To effectuate the foregoing, appropriate pages for incorporation into the Technical Specifications are attached to this Order.

V.

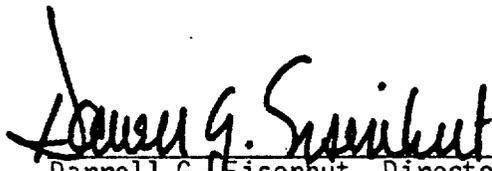
The licensee or any person whose interest may be affected by this Order may request a hearing within 20 days of the date of publication of this Order in the Federal Register. Any request for a hearing will not stay the effective date of this Order. Any request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555. A copy of the request should also be sent to the Executive Legal Director, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, and to Michael W. Maupin, Hunton and Williams, Post Office Box 1535, Richmond, Virginia 23213, attorney for the licensee.

If a hearing is held concerning this Order, the issues to be considered at the hearing shall be:

- a. whether the licensee should be required to have the environmental qualification records referred to in Section IV, above, available at a central location by no later than December 1, 1980; and
- b. whether all safety-related electrical equipment should be qualified as required in Section IV, above, by no later than June 30, 1982.

Operation of the facility on terms consistent with this Order is not stayed by the pendency of any proceedings on the Order.

FOR THE NUCLEAR REGULATORY COMMISSION



Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Effective Date: October 24, 1980
Bethesda, Maryland

Attachments:

1. Technical Specification Pages
2. Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors
3. NUREG-0588, Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
VIRGINIA ELECTRIC AND POWER COMPANY)
(Surry Power Station, Unit No. 2))

Docket No. 50-281

ORDER FOR MODIFICATION OF LICENSE

I.

Virginia Electric and Power Company (the licensee) is the holder of Facility Operating License No. DPR-37, which authorizes the operation of the Surry Power Station, Unit No. 2 at steady state reactor power levels not in excess of 2441 megawatts thermal (rated power). The facility consists of a pressurized water reactor located at the licensee's site in Surry County, Virginia.

II.

On November 4, 1977, the Union of Concerned Scientists (UCS) filed with the Commission a "Petition for Emergency and Remedial Relief." The petition sought action in two areas: fire protection for electrical cables, and environmental qualification of electrical components. By Memorandum and Order dated April 13, 1978 (7 NRC 400), the Commission denied certain aspects of the petition and, with respect to other aspects, ordered the NRC staff to take several related actions. UCS filed a Petition for Reconsideration on May 2, 1978. By Memorandum and Order, dated May 23, 1980, the Commission reaffirmed its April 13, 1978 decision regarding the possible shutdown of operating reactors. However, the Commission's May 23, 1980 decision directed licensees and the NRC staff to undertake certain actions.

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With respect to environmental qualification of safety-related electrical equipment, the Commission determined that the provisions of the two staff documents - the Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines) and NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," December 1979 (copies attached) "form the requirements which licensees and applicants must meet in order to satisfy those aspects of 10 CFR Part 50, Appendix A General Design Criterion (GDC-4), which relate to environmental qualifications of safety-related electrical equipment." The Commission directed, for replacement parts in operating plants, "unless there are sound reasons to the contrary, the 1974 standard in NUREG-0588 will apply." The Commission also directed the staff to complete its review of the information sought from licensees by Bulletin 79-01B¹ and to complete its review of environmental qualification of safety-related electrical equipment in all operating plants, including the publication of Safety Evaluation Reports, by February 1, 1981. The Commission imposed a deadline that, "by no later than June 30, 1982 all safety-related electrical equipment in all operating plants shall be qualified to the DOR Guidelines or NUREG-0588."

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Bulletin 79-01B was not sent to licensees for plants under review as part of the staff's Systematic Evaluation Program. The information sought by Bulletin 79-01B was requested from these licensees by a series of letters and meetings during the months of February and March, 1980.

- 3 -

The Commission requested the staff to, "keep the Commission and the public apprised of any further findings of incomplete environmental qualification of safety-related electrical equipment, along with corrective actions taken or planned," and requested the staff to provide bi-monthly progress reports to the Commission.

The Commission further directed that, "In order to leave no room for doubt on this issue, the staff is to prepare additional Technical Specifications for all operating plants which codify the documentation requirement paragraph of the Guidelines (paragraph 8.0)." The staff was directed to add these documentation requirements to each license after they were approved by the Commission.

The Commission also pointed out that the various deadlines imposed in its Order, "do not excuse a licensee from the obligation to modify or replace inadequate equipment promptly."

III.

The Commission has approved the Technical Specification provisions set forth in Section IV below which specify documentation requirements and which specifically impose on the licensee the requirement of the Commission's May 23, 1980 Memorandum and Order that by no later than June 30, 1982 all safety-related electrical equipment shall be qualified to the DOR Guidelines or NUREG-0588.

The information developed during the Commission review of the UCS Petition emphasizes the importance of prompt completion of the upgrading of

environmental qualification of safety-related electrical equipment to conform to the DOR Guidelines or NUREG-0588 and of adequate documentation of equipment qualifications. The deadlines set forth in the Commission's Memorandum and Order dated May 23, 1980, assure that such upgrading will be accomplished promptly. In order to assure prompt completion of necessary qualification work or replacement of unqualified components, if necessary, in conformance with the requirements of the Commission's Memorandum and Order dated May 23, 1980, and to provide complete and adequate documentation as promptly as possible, such upgrading and documentation work must commence immediately. Therefore, I have concluded that the public health, safety and interest require this Order for Modification of License to be effective immediately.

IV.

Accordingly, pursuant to the Atomic Energy Act of 1954, as amended, and the Commission's Rules and Regulations in 10 CFR Parts 2 and 50, IT IS ORDERED THAT EFFECTIVE IMMEDIATELY Facility Operating License No. DPR-37 is hereby amended to add the following provisions to the Appendix A Technical Specifications.

- (a). "By no later than June 30, 1982, all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588, "Interim Staff Position on Environmental

Qualification of Safety-Related Electrical Equipment," December 1979. Copies of these documents are attached to Order for Modification of License No. DPR-37 dated October 24, 1980.

- (b) "By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified."

To effectuate the foregoing, appropriate pages for incorporation into the Technical Specifications are attached to this Order.

V.

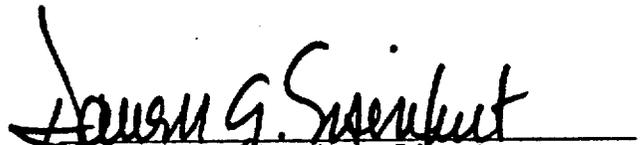
The licensee or any person whose interest may be affected by this Order may request a hearing within 20 days of the date of publication of this Order in the Federal Register. Any request for a hearing will not stay the effective date of this Order. Any request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555. A copy of the request should also be sent to the Executive Legal Director, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, and to Michael W. Maupin, Hunton and Williams, Post Office Box 1535, Richmond, Virginia 23213, attorney for the licensee.

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- b. whether all safety-related electrical equipment should be qualified as required in Section IV, above, by no later than June 30, 1982.

Operation of the facility on terms consistent with this Order is not stayed by the pendency of any proceedings on the Order.

FOR THE NUCLEAR REGULATORY COMMISSION


Darrell G. Sisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Effective Date: October 24, 1980
Bethesda, Maryland

Attachments:

1. Technical Specification Pages
2. Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors
3. NUREG-0588, Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment.

3. Records relative to the following items shall be retained for the life of the plant.

1. Records of changes made to the plant and plant drawings as described in the FSAR pursuant to 10 CFR 50.59.
2. Records of new and spent fuel inventory and assembly histories.
3. Records of plant radiation and contamination surveys.
4. Records of off-site environmental monitoring surveys.
5. Records of radiation exposure of all plant personnel, and others as required by 10 CFR 20.
6. Records of radioactivity in liquid and gaseous wastes released to the environment.
7. Primary records of inservice inspections including, but not limited to radiographs (of welds which are radiographed), photographs of the scope traces for welds which are tested by ultrasonic techniques, and photographs of the surface of those welds inspected by visual or surface examinations.
8. Records for Environmental Qualification which are covered under the provisions of paragraph 6.7.

6.7 Environmental Qualifications

- A. By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," December 1979. Copies of these documents are attached to Order for Modification of License Nos. DPR-32 and DPR-37 dated October 24, 1980.
- B. By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient details to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.