

August 18, 1998

Mr. J. P. O'Hanlon  
Senior Vice President - Nuclear  
Virginia Electric and Power Company  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

SUBJECT: ENVIRONMENTAL ASSESSMENT OF REQUEST FOR EXEMPTION FROM  
10 CFR 20.1703(a)(1), 10 CFR 20.1703(c) AND 10 CFR PART 20 APPENDIX A,  
PROTECTION FACTORS FOR RESPIRATORS, FOOTNOTE d.2.(d), SURRY  
POWER STATION, UNITS 1 AND 2 (TAC NOS. M98382 AND M98383)

Dear Mr. O'Hanlon:

Enclosed for your information is a copy of an "Environmental Assessment and Finding of No Significant Impact." This assessment relates to your application dated March 3, 1998, as supplemented May 5, 1998, which requested an exemption from certain requirements of 10 CFR 20.1703(a)(1), 10 CFR 20.1703(c), and 10 CFR Part 20, Appendix A, Protection Factors for Respirators, Footnote d.2.(d).

The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,

Original Signed by:  
G. E. Edison, Sr. Project Manager  
Project Directorate II-1  
Division of Reactor Projects II-1  
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281  
Enclosure: Environmental Assessment  
cc w/encl: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 18, 1998

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The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,

A handwritten signature in black ink that reads "G. E. Edison".

G. E. Edison, Sr. Project Manager  
Project Directorate II-1  
Division of Reactor Projects II-1  
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosure: Environmental Assessment

cc w/encl: See next page

Mr. J. P. O'Hanlon  
Virginia Electric and Power Company

Surry Power Station

cc:

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U. S. Nuclear Regulatory Commission  
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Atlanta, Georgia 30303

Chairman  
Board of Supervisors of Surry County  
Surry County Courthouse  
Surry, Virginia 23683

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State Health Commissioner  
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Richmond, Virginia 23218

UNITED STATES NUCLEAR REGULATORY COMMISSIONVIRGINIA ELECTRIC AND POWER COMPANYSURRY POWER STATION, UNITS 1 AND 2DOCKET NOS. 50-280 AND 50-281ENVIRONMENTAL ASSESSMENT AND FINDING OFNO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from certain requirements of its regulations with respect to Facility Operating License No. DPR-32 and Facility Operating License No. DPR-37, issued to Virginia Electric and Power Company (VEPCO, the licensee) for operation of the Surry Power Station (SPS), Units 1 and 2 located in Surry County, Virginia.

ENVIRONMENTAL ASSESSMENTIdentification of Proposed Action:

The proposed action is in accordance with the licensee's application dated March 3, 1998, as supplemented May 5, 1998, concerning the use of respiratory protection equipment which has not been tested by the National Institute for Occupational Safety and Health/Mine Safety and Health Administration (NIOSH/MSHA). Pursuant to 10 CFR 20.2301, the licensee has requested exemptions from the following:

1. 10 CFR 20.1703(a)(1) which requires that "..... the licensee shall use only respiratory protection equipment that is tested and certified or had certification extended by NIOSH/MSHA;"
2. 10 CFR 20.1703(c) which requires that "the licensee shall use as emergency devices only respiratory protection equipment that has been specifically certified or had certification extended for emergency use by NIOSH/MSHA;" and
3. 10 CFR Part 20 Appendix A, Protection Factors for Respirators, Footnote d.2.(d), which states, in part, that "..... the protection factors apply for atmosphere-supplying respirators only when supplied with adequate respirable air. Respirable air shall be provided of the quality and quantity required in accordance with NIOSH/MSHA certification (described in 30 CFR Part 11). Oxygen and air shall not be used in the same apparatus."

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The Need for the Proposed Action:

Subpart H to 10 CFR Part 20, "Respiratory Protection and Controls to Restrict Internal Exposure in Restricted Areas" states in 10 CFR 20.1702, "When it is not practical ... to control the concentrations of radioactive material in air to values below those that define an airborne radioactivity area, the licensee shall, consistent with maintaining the total effective dose equivalent ALARA, increase monitoring and limit intakes by .... (c) Use of respiratory protection equipment....."

It is necessary for station personnel to periodically enter containments while the units are operating in order to perform inspection or maintenance. The SPS1&2 containments are designed to be maintained at subatmospheric pressure during power operations. The containment pressure can range from 9.0 to 11.0 pounds per square inch, absolute (psia). This containment environment could potentially impact the safety of personnel donning respiratory protection equipment, due to reduced pressure and resulting oxygen deficiency. Under these circumstances, the use of a self-contained breathing apparatus (SCBA) with enriched oxygen breathing gas is required. The licensee initially purchased Mine Safety Appliances, Inc. (MSA) Model 401 open-circuit, dual-purpose, pressure-demand SCBAs constructed of brass components which were originally intended for use with compressed air. The licensee qualified the Model 401 cylinders for use with 35% oxygen/65% nitrogen following the recommendations of the Compressed Gas Association's Pamphlet C-10, "Recommended Procedures for Changes of Gas Service for Compressed Gas Cylinders," established procedures to utilize these devices with an enriched oxygen mixture, and is currently using these SCBAs with a 35% oxygen/65% nitrogen mixture instead of compressed air. The MSA Model 401 SCBA has received the NIOSH/MSHA certification for use with compressed air, but has not been tested for 35% enriched oxygen applications. Using these SCBAs without the NIOSH/MSHA certification requires an exemption from 10 CFR 20.1703(a)(1), 10 CFR 20.1703(c), and 10 CFR Part 20 Appendix A, Protection Factors for Respirators, Footnote d.2.(d).

Environmental Impacts of the Proposed Action:

The proposed action will not alter plant operations, result in an increase in the probability or consequences of accidents, or result in a change in occupational or offsite dose. Therefore, there are no significant radiological impacts associated with the proposed action.

With regard to potential nonradiological impacts, the proposed action will not result in a change in nonradiological plant effluents and will have no other nonradiological environmental impact.

Accordingly, the Commission concludes that there are no significant environmental impacts associated with the proposed action.

Alternatives to the Proposed Action:

Because the Commission's staff has concluded that there is no significant environmental impact associated with the proposed exemption, any alternative to the proposed exemption will have either no significantly different environmental impact or greater environmental impact. The principal alternative would be to deny the requested exemption. Denial would result in no change in current environmental impact.

Alternative Use of Resources:

This action does not involve the use of resources not previously considered in the Final Environmental Statement for the Surry Power Station.

Agencies and Persons Consulted:

In accordance with its stated policy, the NRC staff consulted with Mr. Foldesi of the Virginia Department of Health on July 27, 1998, regarding the environmental impact of the proposed action. Mr. Foldesi had no comments on behalf of the Commonwealth of Virginia.

FINDING OF NO SIGNIFICANT IMPACT

Based upon the foregoing environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed exemption.

For further details with respect to the proposed action, see the licensee's letter dated March 3, 1998, as supplemented May 5, 1998, which is available for public inspection at the Commission's Public Document Room, 2120 L Street, NW., Washington, DC 20555 and at the local public document room located at the Swem Library, College of William and Mary, Williamsburg, Virginia 23185.

Dated at Rockville, Maryland this 18th day of August 1998.

FOR THE NUCLEAR REGULATORY COMMISSION



G. E. Edison, Sr. Project Manager  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation