

October 31, 1995

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

SUBJECT: EXEMPTION FROM REQUIREMENTS OF 10 CFR 50.60, ACCEPTANCE CRITERIA FOR FRACTURE PREVENTION FOR LIGHT-WATER NUCLEAR POWER REACTORS FOR NORMAL OPERATION, SURRY POWER STATION, UNITS 1 AND 2, (TAC NOS. M92537 AND M92538)

Dear Mr. O'Hanlon:

The Commission has issued the enclosed exemption from the requirements of 10 CFR 50.60, "Acceptance Criteria for Fracture Prevention for Light-Water Nuclear Power Reactors for Normal Operation." This exemption permits using the safety margins recommended in the American Society of Mechanical Engineers Code Case N-514, "Low Temperature Overpressure Protection" in lieu of the safety margins required by Appendix G to 10 CFR Part 50.

A copy of the exemption is being forwarded to the Office of Federal Register for publication.

Sincerely,

(Original Signed By)

David B. Matthews, Director
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosure: Exemption

cc w/encl: See next page

Distribution

Docket File OGC
PUBLIC EJordan
PDII-1 RF GHill (4)
WRussell/FMiraglia ACRS (4)
RZimmerman OPA
SVarga/JZwolinski OC/LFDCB
~~DVerrett~~, RII
ABENISLE

FILENAME - C:\AUTOS\WPDOS\SURRY\SU92537.EXE

OFFICE	LA:PDII-1	PM:PDII-1	EMCB	OGC	D:PDII-1
NAME	EDunnington	BBuckley	JStrosnider	EHOLLER	DMatthews
DATE	09/19/95	09/19/95	09/29/95	09/13/95	09/26/95
COPY	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No

D:DRPE
SVarga
09/31/95
Yes/No

OFFICIAL RECORD COPY

140016

9512140231 951031
PDR ADOCK 05000280
P PDR

CP-3
DF01



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 31, 1995

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

SUBJECT: EXEMPTION FROM REQUIREMENTS OF 10 CFR 50.60, ACCEPTANCE CRITERIA FOR FRACTURE PREVENTION FOR LIGHT-WATER NUCLEAR POWER REACTORS FOR NORMAL OPERATION, SURRY POWER STATION, UNITS 1 AND 2, (TAC NOS. M92537 AND M92538)

Dear Mr. O'Hanlon:

The Commission has issued the enclosed exemption from the requirements of 10 CFR 50.60, "Acceptance Criteria for Fracture Prevention for Light-Water Nuclear Power Reactors for Normal Operation." This exemption permits using the safety margins recommended in the American Society of Mechanical Engineers Code Case N-514, "Low Temperature Overpressure Protection" in lieu of the safety margins required by Appendix G to 10 CFR Part 50.

A copy of the exemption is being forwarded to the Office of Federal Register for publication.

Sincerely,

A handwritten signature in cursive script that reads "D B Matthews".

David B. Matthews, Director
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosure: Exemption

cc w/encl: See next page

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

Surry Power Station

cc:

Mr. Michael W. Maupin, Esq.
Hunton and Williams
Riverfront Plaza, East Tower
951 E. Byrd Street
Richmond, Virginia 23219

Office of the Attorney General
Commonwealth of Virginia
900 East Main Street
Richmond, Virginia 23219

Mr. David Christian, Manager
Surry Power Station
P. O. Box 315
Surry, Virginia 23883

Mr. M. L. Bowling, Manager
Nuclear Licensing & Programs
Innsbrook Technical Center
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

Senior Resident Inspector
Surry Power Station
U. S. Nuclear Regulatory Commission
5850 Hog Island Road
Surry, Virginia 23883

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

Dr. W. T. Lough
Virginia State Corporation
Commission
Division of Energy Regulation
P. O. Box 1197
Richmond, Virginia 23209

Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, Georgia 30323

Robert B. Strobe, M.D., M.P.H.
State Health Commissioner
Office of the Commissioner
Virginia Department of Health
P.O. Box 2448
Richmond, Virginia 23218

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
VIRGINIA ELECTRIC AND POWER)	Docket Nos. 50-280
COMPANY)	and 50-281
)	
(Surry Power Station)	
Units 1 and 2)	

EXEMPTION

I.

The Virginia Electric and Power Company (the licensee) is the holder of Facility Operating License Nos. DPR-32 and DPR-37, which authorize operation of the Surry Power Station, Units 1 and 2, respectively. The licenses provide, among other things, that the licensee is subject to all rules, regulations, and orders of the Commission now or hereafter in effect.

The facilities consist of two pressurized water reactors, Surry Power Station, Units 1 and 2, at the licensee's site located in Surry County, Virginia.

II.

In its letter dated June 8, 1995, the licensee requested an exemption from the Commission's regulations. Title 10 of the Code of Federal Regulations, Part 50, Section 60 (10 CFR 50.60), "Acceptance Criteria for Fracture Prevention Measures for Light-water Nuclear Power Reactors for Normal Operation," states that all light-water nuclear power reactors must meet the fracture toughness and material surveillance program requirements for the reactor coolant pressure boundary as set forth in Appendices G and H to 10 CFR

Part 50. Appendix G to 10 CFR Part 50 defines pressure/temperature (P/T) limits during any condition of normal operation, including anticipated operational occurrences and system hydrostatic tests to which the pressure boundary may be subjected over its service lifetime. It is specified in 10 CFR 50.60(b) that alternatives to the described requirements in Appendices G and H to 10 CFR Part 50 may be used when an exemption is granted by the Commission under 10 CFR 50.12.

To prevent low temperature overpressure transients that would produce pressure excursions exceeding the Appendix G P/T limits while the reactor is operating at low temperatures, the licensee installed a low temperature overpressure (LTOP) system. The system includes pressure-relieving devices called Power-Operated Relief Valves (PORVs). The PORVs are set at a pressure low enough so that if an LTOP transient occurred, the mitigation system would prevent the pressure in the reactor vessel from exceeding the Appendix G P/T limits. To prevent the PORVs from lifting as a result of normal operating pressure surges (e.g., reactor coolant pump starting, and shifting operating charging pumps) with the reactor coolant system in a water solid condition, the operating pressure must be maintained below the PORV setpoint.

The licensee has requested the use of Code Case N-514, "Low Temperature Overpressure Protection," which allows exceedance of the Appendix G safety limits by 10%. Code Case N-514, the proposed alternate methodology, is consistent with guidelines developed by the American Society of Mechanical Engineers (ASME) Working Group on Operating Plant Criteria to define pressure limits during LTOP events that avoid certain unnecessary operational restrictions, provide adequate margins against failure of the reactor pressure vessel, and reduce the potential for unnecessary activation of pressure-relieving devices used for LTOP. Code Case N-514 has been approved by

the ASME Code Committee. The content of this code case has been incorporated into Appendix G of Section XI of the ASME Code and published in the 1993 Addenda to Section XI. In order to utilize Code Case N-514 and to permit LTOP events to exceed the Appendix G safety limits, the licensee has requested an exemption to 10 CFR 50.60 in a letter dated June 8, 1995.

III.

Pursuant to 10 CFR 50.12, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of 10 CFR Part 50 when (1) the exemptions are authorized by law, will not present an undue risk to public health or safety, and are consistent with the common defense and security; and (2) when special circumstances are present. Special circumstances are present whenever, according to 10 CFR 50.12(a)(2)(ii), "Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule...".

The underlying purpose of 10 CFR 50.60, Appendix G, is to establish fracture toughness requirements for ferritic materials of pressure-retaining components of the reactor coolant pressure boundary to provide adequate margins of safety during any condition of normal operation, including anticipated operational occurrences, to which the pressure boundary may be subjected over its service lifetime. Section IV.A.2 of this appendix requires that the reactor vessel be operated with P/T limits at least as conservative as those obtained by following the methods of analysis and the required margins of safety of Appendix G of the ASME Code.

Appendix G of the ASME Code requires that the P/T limits be calculated:

- (a) using a safety factor of 2 on the principal membrane (pressure) stresses,
- (b) assuming a flaw at the surface with a depth of one-quarter (1/4) of the

vessel wall thickness and a length of six (6) times its depth, and (c) using a conservative fracture toughness curve that is based on the lower bound of static, dynamic, and crack arrest fracture toughness tests on material similar to the Surry reactor vessel material.

In determining the setpoint for LTOP events, the licensee proposed to use safety margins based on an alternate methodology consistent with the proposed ASME Code Case N-514 guidelines. The ASME Code Case N-514 allows determination of the setpoint for LTOP events such that the maximum pressure in the vessel would not exceed 110% of the P/T limits of the existing ASME Appendix G. This results in a safety factor of 1.8 on the principal membrane stresses. All other factors, including assumed flaw size and fracture toughness, remain the same. Although this methodology would reduce the safety factor on the principal membrane stresses, the proposed criteria will provide adequate margins of safety to the reactor vessel during LTOP transients and, thus, will satisfy the underlying purpose of 10 CFR 50.60 for fracture toughness requirements. Further, by relieving the operational restrictions, the potential for undesirable lifting of the PORV would be reduced, thereby improving plant safety.

IV.

For the foregoing reasons, the NRC staff has concluded that the licensee's proposed use of the alternate methodology in determining the acceptable setpoint for LTOP events will not present an undue risk to public health and safety and is consistent with the common defense and security. The NRC staff has determined that there are special circumstances present, as specified in 10 CFR 50.12(a)(2), in that application of 10 CFR 50.60 is not necessary in order to achieve the underlying purpose of this regulation.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12(a), an exemption is authorized by law, will not endanger life or property or common defense and security, and is, otherwise, in the public interest. Therefore, the Commission hereby grants an exemption from the requirements of 10 CFR 50.60 such that in determining the setpoint for LTOP events, the Appendix G curves for P/T limits are not exceeded by more than 10 percent in order to be in compliance with these regulations. This exemption is applicable only to LTOP conditions during normal operation.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this exemption will not have a significant effect on the quality of the human environment (60 FR 54710).

This exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


Steven A. Varga, Director
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Dated at Rockville, Maryland,
this 31st day of October 1995