

October 18, 1995

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

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT FOR AN EXEMPTION FROM 10 CFR 50.60, "ACCEPTANCE CRITERIA FOR FRACTURE PREVENTION MEASURES 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:

Enclosed is the "Environmental Assessment and Finding of No Significant Impact" related to your request for an exemption from certain requirements of 10 CFR 50.60, "Acceptance Criteria for Fracture Prevention Measures for Light-Water Nuclear Power Reactors for Normal Operation," for the Surry Power Station, Units 1 and 2. The request was submitted by letter dated January 8, 1995, and requests an exemption from Appendix G to 10 CFR Part 50 so that the American Society of Mechanical Engineers Code Case N-514, "Low Temperature Overpressure Protection," may be used as an acceptable alternative method to determine the acceptable low temperature overpressure protection setpoints.

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

Sincerely,  
(Original Signed By)  
Bart C. Buckley, Senior Project Manager  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosure: As stated

cc w/enclosure: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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*Bart C. Buckley*

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Docket Nos. 50-280 and 50-281

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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

Roy Denmark (5 copies)  
Environmental Review Coordinator  
841 Chestnut Street  
Philadelphia, PA 19107

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 NUCLEAR REGULATORY COMMISSION  
VIRGINIA ELECTRIC AND POWER COMPANY  
DOCKET NOS. 50-280 AND 50-281  
SURRY POWER STATION, UNITS 1 AND 2  
ENVIRONMENTAL ASSESSMENT AND FINDING OF  
NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from certain requirements of its regulations to Facility Operating License Nos. DPR-32 and DPR-37, issued to Virginia Electric and Power Company, (the licensee), for operation of the Surry Power Station, Units 1 and 2 located in Surry County, Virginia.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action:

The proposed action would grant an exemption from certain requirements of 10 CFR 50.60, "Acceptance Criteria for Fracture Prevention Measures for Light-Water Nuclear Power Reactors for Normal Operation," to allow application of an alternate methodology to determine the low temperature overpressure protection (LTOP) setpoint for the Surry Power Station, Units 1 and 2. The proposed alternate methodology is consistent with guidelines developed by the American Society of Mechanical Engineers (ASME) Working Group on Operating Plant Criteria (WGOPC) 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. These guidelines have been incorporated into Code Case N-514, "Low Temperature Overpressure Protection," which 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.

The philosophy used to develop Code Case N-514 guidelines is to ensure that the LTOP limits are still below the pressure/temperature (P/T) limits for normal operation, but allow the pressure that may occur with activation of pressure-relieving devices to exceed the P/T limits, provided acceptable margins are maintained during these events. This philosophy protects the pressure vessel from LTOP events, and still maintains the Technical Specification P/T limits applicable for normal heatup and cooldown in accordance with Appendix G to 10 CFR Part 50 and Sections III<sup>#</sup> and XI of the ASME Code.

The Need for the Proposed Action:

Pursuant to 10 CFR 50.60, 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 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 transients that would produce pressure excursions exceeding the Appendix G P/T limits while the reactor is operating at low temperatures, the licensee installed an LTOP system. The LTOP system includes pressure

relieving devices in the form of Power-Operated Relief Valves (PORVs) that are set at a pressure low enough that if a transient occurred while the coolant temperature is below the LTOP enabling temperature, they would prevent the pressure in the reactor vessel from exceeding the Appendix G P/T limits. To prevent these valves 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 reactor coolant system pressure/temperature operating window at low temperatures is defined by the LTOP setpoint. Minimal operating margin is available between the LTOP setpoint and the pressure experienced at low temperatures due to the startup of a reactor coolant pump, or as a result of normal operating pressure surges with the reactor coolant system in a water solid condition. Implementation of a LTOP setpoint that is valid from 15 EFPY to the end-of-license without the additional margin allowed by ASME Code Case N-514 would restrict the pressure/temperature operating window and would potentially result in undesired PORV lifts. Therefore, the licensee proposed that in determining the PORV setpoint for LTOP events for Surry, the allowable pressure be determined using the safety margins developed in an alternate methodology in lieu of the safety margins required by Appendix G to 10 CFR Part 50. The alternate methodology is consistent with ASME Code Case N-514. 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.

An exemption from 10 CFR 50.60 is required to use the alternate methodology for calculating the maximum allowable pressure for LTOP

considerations. By application dated June 8, 1995, the licensee requested an exemption from 10 CFR 50.60.

Environmental Impacts of the Proposed Action:

The Commission has completed its evaluation of the proposed action.

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 PORV 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.

The change will not increase the probability or consequences of accidents, no changes are being made in the types of any effluents that may be released offsite, and there is no significant increase in the allowable individual or cumulative occupational radiation exposure. Accordingly, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed action.

With regard to potential non-radiological impacts, the proposed change involves use of a lower safety margin on fracture toughness for determining the PORV setpoint during LTOP events; but reduces the potential for activation

of pressure relieving devices, thereby improving plant safety. It does not affect non-radiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant non-radiological environmental impacts associated with the proposed action.

Alternatives to the Proposed Action:

Since the Commission has concluded there is no measurable environmental impact associated with the proposed action, any alternatives with equal or greater environmental impact need not be evaluated. As an alternative to the proposed action, the staff considered denial of the proposed action. Denial of the application would result in no change in current environmental impacts. The environmental impacts of the proposed action and the alternative action are similar.

Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the Final Environmental Statement for the Surry Power Station, Units 1 and 2.

Agencies and Persons Consulted:

In accordance with its stated policy, on October 13, 1995, the staff consulted with the Virginia State official, Mr. Foldesi of the State Health Department, regarding the environmental impact of the proposed action. The State official had no comments.

FINDING OF NO SIGNIFICANT IMPACT

Based upon the 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 action.



For further details with respect to the proposed action, see the licensee's letter dated June 8, 1995, which is available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, NW., Washington, DC, 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 October 1995.

FOR THE NUCLEAR REGULATORY COMMISSION



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