

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

July 15, 1997

SUBJECT: SURRY UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: RELOCATION OF RECORD RETENTION REQUIREMENTS, IN ACCORDANCE WITH ADMINISTRATIVE LETTER 95-06, FOR SURRY POWER STATION, UNITS 1 AND 2 (TAC NOS. M97434 AND M97435)

Dear Mr. O'Hanlon:

The Commission has issued the enclosed Amendment No. 211 to Facility Operating License No. DPR-32 and Amendment No. 211 to Facility Operating License No. DPR-37 for the Surry Power Station, Unit Nos. 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application transmitted by letter dated November 26, 1996.

These amendments would revise the TSs to eliminate the records retention requirements from Section 6.5 of the TSs. The relocation of those requirements to your Operational Quality Assurance program, contained in the Updated Final Safety Analysis Report, has been completed.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

This completes our effort on this issue and we are, therefore, closing out TAC Nos. M97434 and M97435.

Sincerely,  
 Original signed by:  
 Gordon Edison, 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

Enclosures:

1. Amendment No. 211 to DPR-32
2. Amendment No. 211 to DPR-37
3. Safety Evaluation

cc w/enclosures:  
 See next page

Distribution: See next page

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DATE	6/23/97	6/23/97	6/27/97	6/27/97	7/7/97	7/12/97
COPY	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No

per changes as noted  
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Mr. J. P. O'Hanlon  
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Surry Power Station

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-280

SURRY POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 211  
License No. DPR-32

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Virginia Electric and Power Company (the licensee) dated November 26, 1996, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

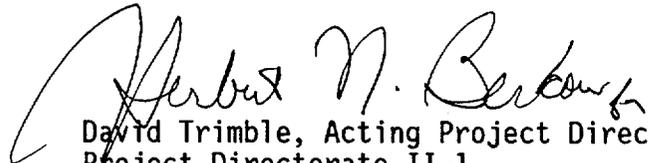
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-32 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 211, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



David Trimble, Acting Project Director  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: July 15, 1997



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-281

SURRY POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 211  
License No. DPR-37

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Virginia Electric and Power Company (the licensee) dated November 26, 1996, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

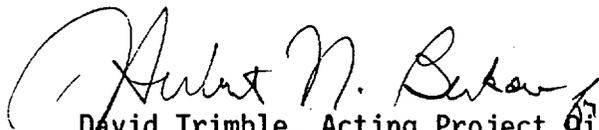
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-37 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 211, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



David Trimble, Acting Project Director  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: July 15, 1997

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 211 TO FACILITY OPERATING LICENSE NO. DPR-32

AMENDMENT NO. 211 TO FACILITY OPERATING LICENSE NO. DPR-37

DOCKET NOS. 50-280 AND 50-281

Revise Appendix A as follows:

Remove Pages

TS 6.5-1

TS 6.5-2

TS 6.5-3

Insert Page

TS 6.5-1

Section 6.5, "Station Operating Records," has been relocated to the Operational Quality Assurance Program, and Pages TS 6.5-2 and TS 6.5-3 have been deleted in their entirety.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 211 TO FACILITY OPERATING LICENSE NO. DPR-32  
AND AMENDMENT NO. 211 TO FACILITY OPERATING LICENSE NO. DPR-37

VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-280 AND 50-281

1.0 INTRODUCTION

By letter dated November 26, 1996, Virginia Electric and Power Company submitted a request for changes to the Surry Units 1 and 2 Technical Specifications (TSs). The proposed amendments would eliminate the records retention requirements for the Administrative Section of the TSs in accordance with Generic Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." The record retention requirements are currently located in both the TSs and in the Updated Final Safety Analysis Report (UFSAR). Guidance on the proposed changes was developed by NRC and provided in the Standard Technical Specifications for Westinghouse Plants, NUREG-1431.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the Act) requires applicants for nuclear power plant operating licenses to state TSs to be included as part of the license. The U.S. Nuclear Regulatory Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TSs include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in the plant TSs.

The Commission has provided guidance for the contents of TSs in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (Final Policy Statement), 58 Federal Register (FR) 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies § 182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TSs to licensee-controlled documents, consistent with the standard enunciated in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated that "technical specifications are to be reserved for those matters as to which the

imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety."

Consistent with this approach, the Final Policy Statement identified four criteria to be used in determining whether particular safety functions are required to be included in the TSs, as follows: (1) Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety. The Commission recently adopted amendments to 10 CFR 50.36, pursuant to which the rule was revised to codify and incorporate these criteria. See Final Rule, "Technical Specifications," 60 FR 36953 (July 19, 1995). As a result, TS requirements which fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the TSs, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other, licensee-controlled documents.

10 CFR 50.36 provides that those existing TS LCOs which do not satisfy these four specified criteria may be relocated to the Updated Final Safety Analysis Report (UFSAR), such that future changes could be made to these provisions pursuant to 10 CFR 50.59. Other requirements may be relocated to more appropriate documents (e.g., Security Plan, Quality Assurance (QA) Plan, and Emergency Plan) and controlled by the applicable regulatory requirement. Similarly, while the required content of TS administrative controls is specified in 10 CFR 50.36(c)(5), particular details of administrative controls may be relocated to licensee-controlled documents where §50.54, §50.59, or other regulations provide adequate regulatory control.

While the criteria specifically apply to LCOs, in adopting the revision to the rule the Commission indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TSs (60 FR 36958). Addressing administrative controls, 10 CFR 50.36(c)(5) states that they "are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure safe operation of the facility in a safe manner." In other words, these provisions are ones that the Commission deems essential for the safe operation of the facility, and which are not already adequately covered by other regulations. Accordingly, the NRC staff has determined that requirements that are not specifically required under 50.36(c)(5), and which are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, can be removed from administrative controls.

### 3.0 EVALUATION

By letter dated November 26, 1996, the licensee proposed changes that would delete the Surry TS requirements for record retention. The relocation of those requirements to the Operational Quality Assurance Program (QAP) has been completed and they are contained in the Surry UFSAR. The changes were reviewed in accordance with the guidance provided in NUREG-1431. In addition, these changes were reviewed in accordance with the guidance provided in Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance" issued on December 12, 1995.

#### 3.1 Record Retention

The licensee proposed that the requirements for record retention in TS 6.5 be relocated because they are adequately addressed by the QAP (10 CFR Part 50, Appendix B, Criteria XVII). These items relocated to the QAP are not necessary to assure safe operation of the plant. Change control for the relocated TSs record retention requirements is provided by 10 CFR 50.54(a).

Facility operations are performed in accordance with approved written procedures. Areas controlled by procedures include normal startup, operation and shutdown, abnormal conditions and emergencies, refueling, safety-related maintenance, surveillance and testing, and radiation control. Facility records document appropriate station operations and activities. Retention of these records provides document retrievability for review for compliance with requirements and regulations. Post-compliance review of records does not directly assure operation of the facility in a safe manner, as activities described in these documents have already been performed. In addition, numerous other regulations such as 10 CFR Part 20, Subpart L, and 10 CFR 50.71 require the retention of certain records related to operation of the nuclear plant.

The provisions in the QAP implement the Commission's regulations pertaining to the maintenance of records related to activities affecting quality. The required controls related to record retention specified in various regulations and the provision incorporated into the QAP are considered to be redundant to the requirements currently in the TSs. The NRC staff has determined that record retention requirements are adequately addressed by existing regulations and the related QAP commitments. Based upon the relocation of the record retention provisions to the QAP, it is not necessary to include redundant or additional requirements in the TS administrative controls.

The staff concludes that the regulatory requirements under 10 CFR Part 50, Appendix B provide sufficient control of the plant records, and sufficient regulatory controls exist for future changes to the program pursuant to 10 CFR 50.54(a), such that removing these provisions from the TSs is acceptable.

In conclusion, the above relocated requirements relating to administrative controls are not required to be in the TSs under 10 CFR 50.36 or 182a of the Atomic Energy Act, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. In addition, the staff finds that the resulting new administrative controls provide all of the requirements needed to satisfy 10 CFR 50.36(c)(5), and sufficient regulatory controls exist under 10 CFR 50.59 and 50.54(a), or other applicable regulations to assure continued protection of the public health and safety. Accordingly, the staff has concluded that these requirements may be removed from the TSs since they currently exist in the above specified documents.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Virginia State Official was notified of the proposed issuance of the amendments. The State Official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

These amendments change recordkeeping, reporting, or administrative procedures or requirements. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Tanya Eaton

Date: July 15, 1997

LETTER DATED: July 15, 1997

AMENDMENT NO. 211 TO FACILITY OPERATING LICENSE NO. DPR-32 - SURRY UNIT 1  
AMENDMENT NO. 211 TO FACILITY OPERATING LICENSE NO. DPR-37 - SURRY UNIT 2

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PUBLIC

PDII-1 Reading

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