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> **DPR-32** Licenses Nos. **DPR-37** and

Change No. 12

Mr. Stanley Ragone Vice President Virginia Electric and Power Company P. O. Box 26666 Richmond, Virginia 23261

Dear Mr. Ragone:

Docket Nos. 50-280

and 50-281

Your letter dated August 15, 1973, enclosed proposed changes in Section 6.1, "Organization, Safety and Operation Review"; Section 6.2, "Action to be Taken in the Event of an Abnormal Occurrence in Station Operation"; Section 6.3, "Action to be Taken if a Safety Limit is Exceeded"; and Section 6.4, "Unit Operating Procedures" of the Technical Specifications for Facility Operating Licenses Nos. DPR-32 and DPR-37 for Surry Power Station Units 1 and 2. The proposed changes would update Virginia Electric and Power Company's management and operating organization, reporting procedures to reflect recent organizational changes, expand the System Nuclear Safety and Operating Committee, and correct a typographical error.

We have reviewed the proposed changes in the Virginia Electric and Power Company management structure which reflect recent reassignments of management and reporting procedures. We have determined that the proposed changes do not adversely affect the management of reactor operations; therefore, the changes are acceptable.

We have concluded that the proposed changes do not involve a significant hazards consideration, and there is reasonable assurance that the health and safety of the public will not be endangered by operation of the reactor in the manner proposed.

Accordingly, pursuant to Section 50.59 of 10 CFR Part 50, the Technical Specifications of Facility Operating Licenses Nos. DPR-32 and DPR-37 are hereby changed as set forth in Sections 6.1, 6.2, and 6.3, and page TS 6.4-2, Change No. 12, copies of which are enclosed. Although every page of

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Section 6.1 of Change No. 12 has not been changed, the entire section is replaced as a separate entity.

Sincerely,

Original signed by R. C. DeYoung

R. C. DeYoung, Assistant Director for Pressurized Water Reactors Directorate of Licensing - Regulation

Enclosures: As stated

cc: George D. Gibson, Esq.
Hunton, Williams, Gay,
and Gibson
P. O. Box 1535
Richmond, Virginia 23213

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DPR-32 Licenses Nos. and DPR-37

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R. C. DeYoung, Assistant Director for Pressurized Water Reactors Directorate of Licensing - Regulation

Enclosures: As stated

cc: George D. Gibson, Esq.
Hunton, Williams, Gay,
and Gibson
P. O. Box 1535
Richmond, Virginia 23213

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CHANGE NO. 12

- 6.0 ADMINISTRATIVE CONTROLS
- 6.1 ORGANIZATION, SAFETY AND OPERATION REVIEW

Specification

- A. The Station Manager shall be responsible for the safe operation of the facility. The Station Manager shall report to the Manager Production Operation and Maintenance. The relationship between this Manager and other levels of company management is shown in TS Figures 6.1-1, 6.1-2, and 6.1-3.
- B. The station organization shall conform to the chart as shown in TS Figure 6.1-4.
 - 1. Qualifications with regard to education and experience and the technical specialties of key supervisory personnel will meet the minimum acceptable levels described in Regulatory Guide No. 1.8 "Personnel Selection and Training," dated March 10, 1971.

 The key supervisory personnel are as follows:
 - a) Manager
 - b) Superintendent-Station Operations
 - c) Operating Supervisor
 - d) Supervisor-Electrical Maintenance
 - e) Supervisor-Mechanical Maintenance
 - f) Supervisor-Engineering Services
 - g) Chemistry and Health Physics Supervisor
 - h) Shift Supervisor

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- 2. Retraining and replacement training of station personnel shall be in accordance with Regulatory Guide No. 1.8 "Personnel Selection and Training," dated March 10, 1971.
- 3. The following requirements supplement the applicable regulations of 10 CFR 50.54:

	Condition	Minimum Complement
1.	One unit operating	1 SLO, 2 LO, 2 AO
2.	One unit fueled and shutdown**	1 SLO, 1 LO, 1 AO
3.	One unit operating and one unit shutdown	1 SLO*, 3 LO, 2 AO
4.	Both units fueled and shutdown**	1 SLO, 2 LO, 1 AO
5.	Both units operating	2 SLO, 3 LO, 2 AO

Note:

SLO = Senior Licensed Operator as defined by 10 CFR 55.4(e)

LO = Licensed Operator as defined by 10 CFR 55.4(d)

AO = Auxiliary Operator

* When the shutdown unit is undergoing refueling or startup, l additional SLO will be added to this shift complement to ensure supervision of these activities.

- ** A LO for each fueled unit shall be in the control room and a SLO shall be on site. For each SLO in the control room, the requirement to have a LO in the control room shall be waived.
- C. Organization units to provide a continuing review of the operational and safety aspects of the nuclear facility shall be constituted and have the authority and responsibilities outlined below:
 - 1. Station Nuclear Safety and Operating Committee
 - a. Membership
 - 1. Chairman Manager
 - 2. Vice Chairman Superintendent-Station Operations

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- 3. Operating Supervisor
- 4. Supervisor-Electrical Maintenance
- 5. Supervisor-Mechanical Maintenance
- 6. Supervisor-Engineering Services
- 7. Chemistry and Health Physics Supervisor
- b. Qualifications: The qualifications of the regular members of the Station Nuclear Safety and Operating Committee with regard to the combined experience and technical specialties of the individual members shall be maintained at a level at least equal to those described in Section 6.1.B.1 of these Specifications.
- c. Meeting frequency: As called by the Chairman but not less than monthly.
- d. Quorum: Chairman or Vice Chairman, Chemistry and Health Physics Supervisor, and three others to provide a quorum of five members. The Chairman or Vice Chairman may appoint a similiarly qualified designee to represent a member other than the Chairman or Vice Chairman.

e. Responsibilities

Periodically review all proposed normal, abnormal, and emergency operating procedures and all proposed maintenance procedures.
 Review proposed changes to those procedures, and any other proposed procedures or changes thereto as determined by the Station Manager which affect nuclear safety.

- Review all proposed test and experiment procedures and results thereof when applicable.
- 3. Review proposed changes to Technical Specifications.
- 4. Review all proposed changes or modifications to systems or equipment that would require a change in established procedures, or which would constitute a design change.
- 5. Periodically review all operations to detect any potential safety hazards.
- 6. Investigate all reported instances of departure from Technical Specification limits, such investigations to include review, evaluation and recommendations to prevent recurrence, to the Station Manager, Manager Production Operation and Maintenance and to the Chairman of the System Nuclear Safety and Operating Committee.
- 7. The Station Nuclear Safety and Operating Committee shall make determinations as to whether or not proposals considered by the Committee involve unreviewed safety questions. This determination shall be subject to review by the System Nuclear Safety and Operating Committee.
- 8. Review all abnormal occurrence reports.

- Perform special reviews and investigations and render reports thereon as requested by the Chairman of the System Nuclear Safety and Operating Committee.
- 10. Initiate periodic drills to test the effectiveness of the emergency procedures.

f. Authority

- The Station Nuclear Safety and Operating Committee shall advise the Manager on all matters affecting the safe operation of the facility.
- 2. The Station Nuclear Safety and Operating Committee shall recommend to the Station Manager approval or disapproval of proposals under items e(1) through (4) above.
 - a) In the event of disagreement between the recommendations of the Station Nuclear Safety and Operating Committee and the actions contemplated by the Station Manager, the course determined by the Station Manager will be followed with immediate notification to the Manager Production Operation and Maintenance and the Chairman of the System Nuclear Safety and Operating Committee.

g. Records

Minutes shall be kept of all meetings of the Station Nuclear

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Safety and Operating Committee and copies shall be sent to the Manager Production Operation and Maintenance and to all members of the Station and System Nuclear Safety and Operating Committees.

h. Procedures

Written administrative procedures for committee operation shall be prepared and maintained describing the method of submission, and the content of presentations to the committee, provisions for the use of subcommittees; review and approval by members of written committee evaluations and recommendations; the distributions of minutes; and, such other matters as may be appropriate.

2. System Nuclear Safety and Operating Committee

a. Membership

- 1. Chairman and Vice Chairman appointed by name by the Senior Vice President-Power, which may be an individual listed in Item 2.
- 2. Seven members of the Power Department system office staff who are experienced in utility operation and procedures:

Manager - Production Operation and Maintenance

Manager - Licensing and Quality Assurance

Director - Power Station Engineering

Supervisor - Nuclear Engineering

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Supervisor - Quality Assurance Engineering and Construction

Supervisor - Nuclear Fuel Design and Operation

Supervisor - Nuclear Operation

- 3. Manager of each nuclear generating station operating on the Virginia Electric and Power Company system, or his designee. In matters or consideration of proposals pertinent to a particular station, the Manager of this station shall serve as a non-voting member of the committee. In matters pertaining to other stations, Station Managers will serve as voting members.
- 4. At least one qualified non-company affiliated technical consultant. Duly appointed **consultant** members shall have equal vote with permanent members of the Committee.

b. Qualifications

The minimum qualifications of the Company members of the System Nuclear Safety and Operating Committee will be:

an engineering graduate or equivalent with combined nuclear and conventional experience in power station design anu/or operation of eight years, with at least two years involving the direction of nuclear operations or design activity.

c. Consultants

The committee shall have the authority to call technically

qualified personnel from within the Virginia Electric and Power Company organization or from any other consultant source.

- d. Quorum: Either the Chairman or Vice Chairman and two thirds of the other members shall constitute a quorum.
- e. Meeting frequency: As required by the Chairman but not less than quarterly.

f. Responsibilities

- 1. Review proposed changes to the operating license including Technical Specifications.
- Review minutes of meeting of the Station Nuclear Safety and Operating Committee(s) to determine if matters considered by that committee involve unreviewed or unresolved safety questions.
 - 3. Review matters including proposed changes or modifications by systems or equipment having safety significance referred to it by the Station Nuclear Safety and Operating Committee or by the Station Manager.
 - 4. Conduct periodic review of station operations.
 - 5. Review all reported instances of departure from Technical Specification limits and report findings and recommendations to prevent recurrence to the Executive Manager Power Supply and Production Operations.

- 6. Perform special reviews and investigations and render reports thereon as requested by company management, or as the committee deems necessary.
- Review proposed tests and experiments and results thereof when applicable.
- 8. Review abnormal performance of plant equipment and anomalies.
- 9. Review unusual occurrences and incidents which are reportable under the provisions of 10 CFR 20 and 10 CFR 50.
- 10. Review of occurrences if Safety Limits are exceeded.

g. Authority

- Recommend approval of proposed changes to the operating license, including Technical Specifications, for submission to the A.E.C.
- Recommend approval of proposed changes or modifications to systems or equipment, provided such changes or modifications do not involve unreviewed safety questions.

h. Records

Minutes shall be recorded of all meetings of this Committee.

Copies of the minutes shall be forwarded to the Senior Vice

President-Power, Executive Manager Power Supply and Production

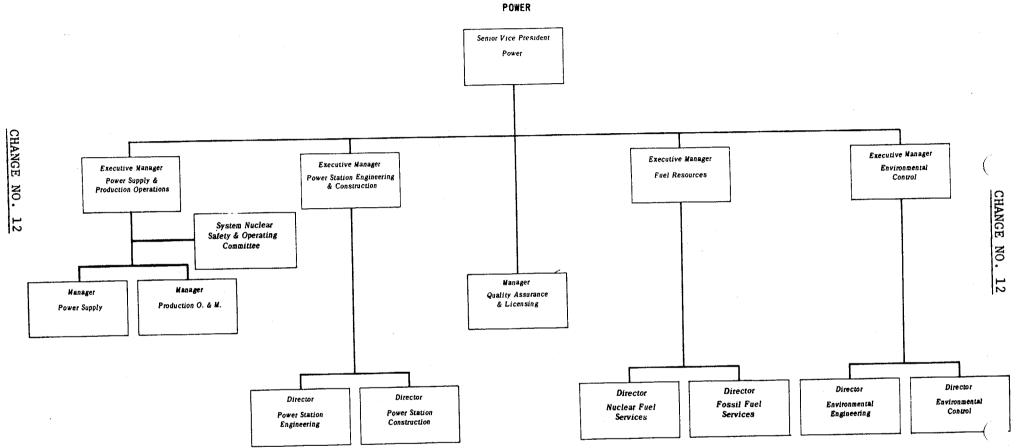
Operations, all members of the committee and any others that

the Chairman may designate.

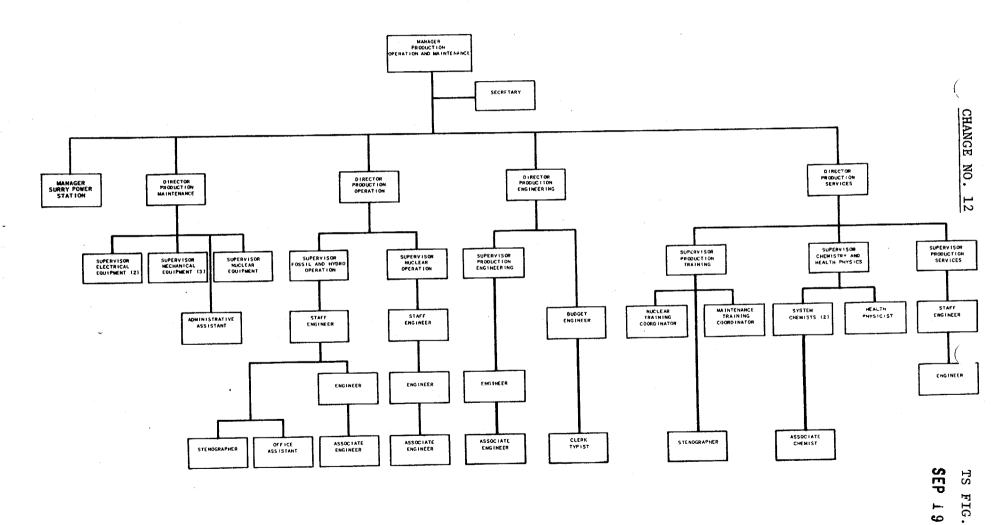
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Written administrative procedures for committee operation shall be maintained describing the method of submission and the content of presentations to the committee; provisions for use of subcommittee evaluations and recommendations; distribution of minutes; and, such other matters as may be appropriate.

VIRGINIA ELECTRIC AND POWER COMPANY ORGANIZATION CHART



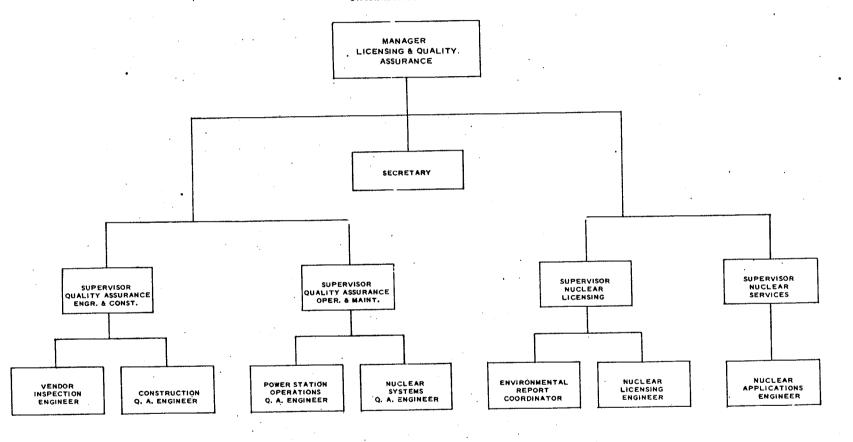
VIRGINIA ELECTRIC AND POWER COMPANY ORGANIZATION CHART PRODUCTION OPERATION AND MAINTENANCE



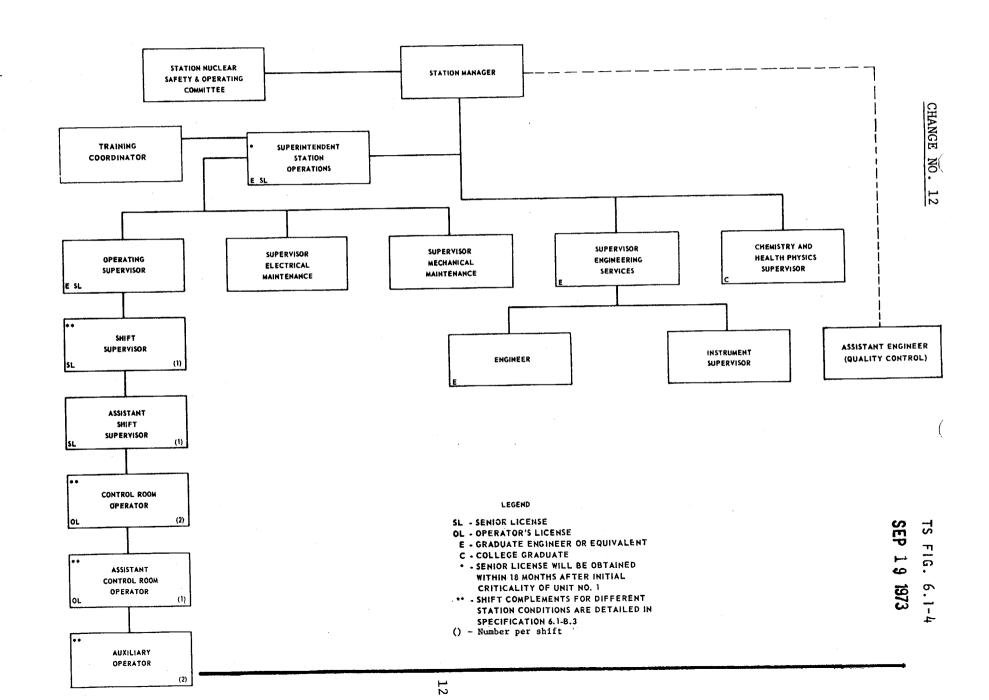
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CHANGE NO 12

VIRGINIA ELECTRIC AND POWER COMPANY LICENSING AND QUALITY ASSURANCE ORGANIZATION CHART



VIRGINIA ELECTRIC AND POWER COMPANY SURRY POWER STATION ORGANIZATION CHART



6.2 ACTION TO BE TAKEN IN THE EVENT OF AN ABNORMAL OCCURRENCE IN STATION OPERATION

Specification

- A. Any abnormal occurrence shall be reported immediately to and promptly reviewed by the Chairman of Station Nuclear Safety and Operation Committee or his designee, Manager Production Operation and Maintenance and the Chairman of the System Nuclear Safety and Operating Committee.
- B. The Shift Supervisor on duty and subsequently the Operating Supervisor shall prepare a report for each abnormal occurrence. This report shall include an evaluation of the cause of the occurrence and also recommendations for appropriate action to prevent or reduce the probability of a recurrence. Immediate corrective action shall be taken to correct the anomaly.
- C. Copies of all such reports shall be submitted to the Superintendent—
 Station Operations, the Station Manager, who also serves as the
 Chairman of the Station Nuclear Safety and Operation Committee, Manager
 Production Operation and Maintenance, and to the Chairman of the System
 Nuclear Safety and Operating Committee for review and approval of any
 recommendation.
- D. The Senior Vice President Power shall report the circumstances of any abnormal occurrence to the AEC as specified in Section 6.6 of these Specifications.

6.3 ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDED

Specification

- A. Should a safety limit (see Section 2.0 of the Technical Specifications) be exceeded, the reactor shall be shutdown and reactor operation shall only be resumed in accordance with the authorization within 10 CFR 50.36 (c)(1)(i).
- B. An immediate report of the incident shall be made to the Station Manager,

 Manager Production Operation and Maintenance and the Chairman of the System

 Nuclear Safety and Operating Committee.
- C. The Station Manager shall promptly report the circumstances to the AEC as specified in Section 6.6 of these Specifications.
- D. A complete analysis of the incident together with recommendations to prevent recurrence shall be prepared by the Shift Supervisor and the Operating Supervisor. A preliminary written report shall be submitted to the Superintendent Station Operations, Station Manager who is also the Chairman of the Station Nuclear Safety and Operating Committee, Manager Production Operation and Maintenance, and the Chairman of the System Nuclear Safety and Operating Committee within 24 hours following the incident.

Appropriate analyses or reports will be submitted to the AEC by the Senior Vice President - Power as specified in Section 6.6 of these Specifications. ١,

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CHANGE NO. 12

- 1. The intent of 10 CFR 20.203(c)(2)(iii) shall be implemented by satisfying the following conditions:
 - a. The entrance to each radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted.
 - b. The entrance to each radiation area in which the intensity of radiation is equal to or greater than 1000 mrem/hr shall be provided with locked barricades to prevent unauthorized entry into these areas. Keys to these locked barricades shall be maintained under the administrative control of the Shift Supervisor.
 - c. All such accessible high radiation areas shall be surveyed by Health Physics personnel on a routine schedule, as determined by the Chemistry and Health Physics Supervisor, to assure a safe and practical program.
 - d. Any individual entering a high radiation area shall have completed the indoctrination course designed to explain the hazards and safety requirements involved, or shall be escorted at all times by a person who has completed the course.
 - e. Any individual or group of individuals permitted to enter a high radiation area per l.d. above, shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.