

April 17, 1991

DO NOT REMOVE

Docket Nos. 50-280
and 50-281

Posted
amdt. 154 to DPR-37

Mr. W. L. Stewart
Senior Vice President - Nuclear
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

Dear Mr. Stewart:

SUBJECT: SURRY UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: RADIOLOGICAL
EFFLUENT TECHNICAL SPECIFICATIONS (TAC NOS. 77597 AND 77598)

The Commission has issued the enclosed Amendment No. 155 to Facility Operating License No. DPR-32 and Amendment No. 154 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 (TS) in response to your application transmitted by letter dated June 29, 1990.

These amendments relocate the Radiological Effluent Technical Specifications to the Offsite Dose Calculation Manual or the Process Control Program, as appropriate.

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

Sincerely,

(Original signed by)

Bart C. Buckley, Senior Project Manager
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 155 to DPR-32
- 2. Amendment No. 154 to DPR-37
- 3. Safety Evaluation

cc w/enclosures:
See next page

JFC	: LA:PD22	: PM:PD22	: D:PD22	: OGC	:	:	:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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See next page

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Surry Power Station

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

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-280

SURRY POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 155
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 June 29, 1990, 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. 155, 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 the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 17, 1991



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

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-281

SURRY POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 154
License No. DPR-37

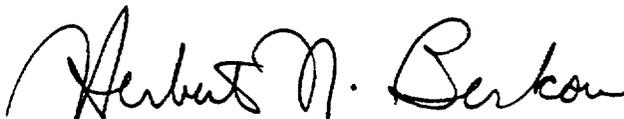
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 - A. The application for amendment by Virginia Electric and Power Company (the licensee) dated June 29, 1990, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations 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. 154, 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 the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 17, 1991

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 155 FACILITY OPERATING LICENSE NO. DPR-32

AMENDMENT NO. 154 FACILITY OPERATING LICENSE NO. DPR-37

DOCKET NOS. 50-280 AND 50-281

Revise Appendix A as follows:

Remove Pages

TS i
TS ii
TS iii
TS 1.0-7
TS 1.0-8
TS 1.0-9
TS 1.0-10
TS 3.7-2
TS 3.7-8
TS 3.7-9
TS 3.7-9a
TS 3.7-9c
TS 3.7-20
TS 3.7-20a
TS 3.7-20b
TS 3.11-1 through
 TS 3.11-23
TS 4.1-8c
TS 4.1-8d
TS 4.9-1 through TS 4.9-15

TS 6.5-3
TS 6.6-10 through
 TS 6.6-17
TS 6.8-1
TS 6.8-2

Insert Pages

TS i
TS ii
TS iii
TS 1.0-7
TS 1.0-8
TS 1.0-9
TS 1.0-10
TS 3.7-2
TS 3.7-8
TS 3.7-9
TS 3.7-9a
TS 3.7-9c
TS 3.7-20
TS 3.7-20a

TS 3.11-1 through
 TS 3.11-2
TS 4.1-8c

TS 4.9-1
TS 6.4-8 through TS 6.4-10
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TS 6.6-10 through
 TS 6.6-12
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K. Low Power Physics Tests

Low power physics tests conducted below 5% of rated power which measure fundamental characteristics of the core and related instrumentation.

L. Fire Suppression Water System

A Fire Suppression Water Systems shall consist of: a water source(s); gravity tank(s) or pump(s); and distribution piping with associated sectionalizing control or isolation valves. Such valves shall include yard hydrant curb valves, and the first valve ahead of the water flow alarm device on each sprinkler, hose standpipe or spray system riser.

M. Offsite Dose Calculation Manual

The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Semi-annual Radioactive Effluent Release Reports required by Specifications 6.6.B.2 and 6.6.B.3.

N. Dose Equivalent I-131

The dose equivalent I-131 shall be that concentration of I-131 (microcurie/gram) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, "Calculation of Distance Factors for Power and Test Reactor Sites" or in NRC Regulatory Guide 1.109, Revision 1, October 1977.

O. Gaseous Radwaste Treatment System

A gaseous radwaste treatment system is any system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system offgases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

P. Process Control Program (PCP)

The process control program shall contain the current formula, sampling, analyses, tests and determinations to be made to ensure that the processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71 State regulations and other requirements governing the disposal of the waste.

Q. Purge - Purging

Purge or purging is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

R. Ventilation Exhaust Treatment System

A ventilation exhaust treatment system is any system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment (such a system is not considered to have any effect on noble gas effluents). Engineered Safety Feature (ESF) atmospheric cleanup systems are not considered to be ventilation exhaust treatment system components.

S. Venting

Venting is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is not provided or required during venting. Vent, used in system names, does not imply a venting process.

T. Site Boundary

The site boundary shall be that line beyond which the land is not owned, leased or otherwise controlled by the licensee.

U. Unrestricted Area

An unrestricted area shall be any area at or beyond the site boundary where access is not controlled by the licensee for purpose of protection of individuals from exposure to radiation and radioactive materials or any area within the site boundary used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

V. Member (s) of the Public

Member(s) of the public shall include all individuals who by virtue of their occupational status have no formal association with the plant. This category shall include non-employees of the license who are permitted to use portions of the site for recreational, occupational, or other purposes not associated with plant functions. This category shall not include non-employees such as vending machine servicemen or postmen who, as part of their formal job function, occasionally enter an area that is controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

- C. In the event of subsystem instrumentation channel failure permitted by Specification 3.7.B2, Tables 3.7-2 and 3.7-3 need not be observed during the short period of time an operable subsystem channel is tested where the failed channel must be blocked to prevent unnecessary reactor trip.

- D. The Engineered Safety Features initiation instrumentation setting limits shall be as stated in TS Table 3.7-4.

- E. The explosive gas monitoring instrumentation channels shown in Table 3.7-5(a) shall be operable with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.A.1 are not exceeded.
 - 1. With an explosive gas monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, declare the channel inoperable and take the action shown in Table 3.7.5(a).

 - 2. With less than the minimum number of explosive gas monitoring instrumentation channels operable, take the action shown in Table 3.7-5(a). Exert best efforts to return the instruments to operable status within 30 days and, if unsuccessful, prepare and submit a Special Report to the Commission (Region II) to explain why this inoperability was not corrected in a timely manner.

4. The steam line high differential pressure limit is set well below the differential pressure expected in the event of a large steam line break accident as shown in the safety analysis. (3)
5. The high steam line flow differential pressure setpoint is constant at 40% full flow between no load and 20% load and increasing linearly to 110% of full flow at full load in order to protect against large steam line break accidents. The coincident low T_{avg} setting limit for SIS and steam line isolation initiation is set below its hot shutdown value. The coincident steam line pressure setting limit is set below the full load operating pressure. The safety analysis shows that these settings provide protection in the event of a large steam line break. (3)

Accident Monitoring Instrumentation

The operability of the accident monitoring instrumentation in Table 3.7-6 ensures that sufficient information is available on selected plant parameters to monitor and assess these variables during and following an accident. On the pressurizer PORV's, the pertinent channels consist of limit switch indication and acoustic

monitor indication. The pressurizer safety valves utilize an acoustic monitor channel and a downstream high temperature indication channel. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," December 1975, and NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short Term Recommendations." Potential accident effluent release paths are equipped with radiation monitors to detect and measure concentrations of noble gas fission products in plant gaseous effluents during and following an accident. The effluent release paths monitored are the Process Vent Stack, Ventilation Vent Stack, Main Steam Safety Valve and Atmospheric Dump Valve discharge and the Auxiliary Feedwater Pump Turbine Exhaust. These monitors meet the requirements of NUREG 0737.

Instrumentation is provided for monitoring (and controlling) the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The operability and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 or Appendix A to 10 CFR Part 50.

Containment Hydrogen Analyzers

Continuous indication of hydrogen concentration in the containment atmosphere is provided in the control room over the range of 0 to 10 percent hydrogen concentration.

These redundant, qualified hydrogen analyzers are shared by Units 1 and 2 with the capability of measuring containment hydrogen concentration for the range of 0 to 10 percent and the installation of instrumentation to indicate and record this measurement.

A transfer switch with control circuitry is provided for the capability of Unit 1 to utilize both analyzers or for Unit 2 to utilize both analyzers.

Each unit's hydrogen analyzer will receive a transferable power supply from Unit 1 and Unit 2. This will ensure redundancy for each unit.

Indication of Unit 1 and Unit 2 hydrogen concentration is provided on Unit 1 PAMC panel and Unit 2 PAMC panel. Hydrogen concentration is also recorded on qualified recorders. In addition, each hydrogen analyzer is provided with an alarm for trouble/high hydrogen content. These alarms are located in the

References

- (1) FSAR - Section 7.5
- (2) FSAR - Section 14.5
- (3) FSAR - Section 14.3.2

1

TABLE 3.7-5

AUTOMATIC FUNCTIONS
OPERATED FROM RADIATION MONITORS ALARM

<u>MONITOR CHANNEL</u>	<u>AUTOMATIC FUNCTION AT ALARM CONDITIONS</u>	<u>MONITORING REQUIREMENTS</u>	<u>ALARM SETPOINT μCi/cc</u>
1. Component cooling water radiation monitors	Shuts surge tank vent valve HCV-CC-100	See Specification 3.13	Twice Background
2. Containment particulate and gas monitors (RM-RMS-159 & RM-RMS-160, RM-RMS-259 & RM-RMS-260)	Trips affected unit's purge supply fans, closes affected unit's purge air butterfly valves (MOV-VS-100A, B, C & D or MOV-VS-200A, B, C & D)	See Specification 3.10	Particulate $\leq 9 \times 10^{-9}$ Gas $\leq 1 \times 10^{-5}$
3. Manipulator crane area monitors (RM-RMS-162 & RM-RMS-262)	Trips affected unit's purge supply fans, closes affected unit's purge air butterfly valves (MOV-VS-100A, B, C & D or MOV-VS-200A, B, C & D)	See Specification 3.10	≤ 50 mrem/hr

TS 3.7-20

TABLE 3.7-5(a)

EXPLOSIVE GAS MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>ACTION</u>
1. Waste Gas Holdup System Explosive Gas Monitoring System		
(a) Hydrogen Monitor	1	1
(b) Oxygen Monitor	1	1

ACTION 1 - With the number of channels operable less than required by the minimum channels operable requirement, operation of this waste gas hold up system may continue provided grab samples are collected at least once per 24 hours and analyzed within the following 4 hours.

3.11 RADIOACTIVE GAS STORAGE

Applicability

Applies to the storage of radioactive gases.

Objective

To establish conditions by which gaseous waste containing radioactive materials may be stored.

Specification

A. Explosive Gas Mixture

1. The concentration of oxygen in the waste gas holdup system shall be limited to less than or equal to 2% by volume whenever the hydrogen concentration exceeds 4% by volume.
 - a. With the concentration of oxygen in the waste gas holdup system greater than 2% by volume but less than or equal to 4% by volume, reduce the oxygen concentration to the above limits within 48 hours.
 - b. With the concentration of oxygen in the waste gas holdup system greater than 4% by volume, immediately suspend all additions of waste gases to the affected tank and reduce the concentration of oxygen to less than or equal to 4% by volume, then take the above action.
2. The requirements of Specification 3.0.1 are not applicable.

B. Gas Storage Tanks

1. The quantity of radioactivity contained in each gas storage tank shall be limited to less than or equal to 24,600 curies of noble gases (considered as Xe-133).
2. With the quantity of radioactive material in any gas storage tank exceeding the above limit, immediately suspend all addition of radioactive material to the tank and within 48 hours reduce the tank contents to within the limits.
3. The requirements of Specification 3.0.1 are not applicable.

Basis

Explosive Gas Mixture

This specification is provided to ensure that the concentration of potentially explosive gas mixtures contained in the waste gas holdup system is maintained below the flammability limits of hydrogen and oxygen. Maintaining the concentration of hydrogen and oxygen below their flammability limits provides assurance that the releases of radioactive materials will be controlled in conformance with the requirements of General Design Criterion 60 of Appendix A to 10 CFR Part 50.

Gas Storage Tanks

The tanks included in this specification are those tanks for which the quantity of radioactivity contained is not limited directly or indirectly by another Technical Specification to a quantity that is less than the quantity which provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting total body exposure to an individual at the nearest exclusion area boundary will not exceed 0.5 rem in an event of 2 hours.

Restricting the quantity of radioactivity contained in each gas storage tank provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting total body exposure to an individual at the nearest exclusion area boundary will not exceed 0.5 rem. This is consistent with Branch Technical Position ETSB 11-5 in NUREG-0800, July 1981.

TABLE 4.1-1A

EXPLOSIVE GAS MONITORING INSTRUMENTATION REQUIREMENTS

<u>CHANNEL DESCRIPTION</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>
1. Waste Gas Holdup System Explosive Gas Monitoring System			
(a) Hydrogen Monitor	D	Q(1)	M
(b) Oxygen Monitor	D	Q(2)	M

-
- (1) - The channel calibration shall include the use of standard gas samples containing a nominal:
1. one volume percent hydrogen, balance nitrogen, and
 2. four volume percent hydrogen, balance nitrogen.
- (2) - The channel calibration shall include the use of standard gas samples containing a nominal:
1. one volume percent oxygen, balance nitrogen, and
 2. four volume percent oxygen, balance nitrogen.

D - Daily
M - Monthly
Q - Quarterly

4.9 RADIOACTIVE GAS STORAGE MONITORING SYSTEM

Applicability

Applies to the periodic monitoring of radioactive gas storage.

Objective

To ascertain that waste gas is stored in accordance with Specification 3.11.

Specification

- A. The concentration of hydrogen or oxygen in the waste gas holdup system shall be determined to be within the limits of Specification 3.11.A by continuously monitoring the waste gases in the waste gas holdup system with the hydrogen or oxygen monitors required operable by Table 3.7-5(a) of Specification 3.7.E.
- B. The quantity of radioactive material contained in each gas storage tank shall be determined to be within the limits of Specification 3.11.B at least once per month when the specific activity of the primary reactor coolant is $\leq 2200 \mu\text{Ci/gm}$ dose equivalent Xe-133. Under the conditions which result in a specific activity $>2200 \mu\text{Ci/gm}$ dose equivalent Xe-133, the Waste Gas Decay Tanks shall be sampled once per day.

N. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,

- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,
- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR Part 20, Appendix B, Table II, Column 1,
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

O. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

9. Records of the service lives of all hydraulic and mechanical snubbers on safety-related systems, including the data at which the service life commences and associated installation and maintenance records.
10. Records of the annual audit of the Station Emergency Plan and implementing procedures.
11. Records of the annual audit of the Station Security Plan and implementing procedures.
12. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

B. Unique Reporting Requirements

1. Inservice Inspection Evaluation

Special summary technical report shall be submitted to the Director of Reactor Licensing, Office of Nuclear Reactor Regulation, NRC, Washington, D.C. 20555, after 5 years of operation. This report shall include an evaluation of the results of the inservice inspection program and will be reviewed in light of the technology available at that time.

2. Annual Radiological Environmental Operating Report¹

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

3. Semiannual Radioactive Effluent Release Report³

The Semiannual Radioactive Effluent Release Report covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

4. Containment Leak Rate Test

Each containment integrated leak rate test shall be the subject of a summary technical report. Upon completion of the initial containment leak rate test specified by proposed Appendix J to 10 CFR 50, a special report shall, if that Appendix is adopted as an effective rule, be submitted to the Director, Division of Reactor Licensing, USNRC, Washington, D. C. 20555, and other containment leak rate tests specified by Appendix J that fail to meet the acceptance criteria of the appendix, shall be the subject of special summary technical reports pursuant to Section V.B of Appendix J:

- a. “Report of Test Results - The initial Type A tests shall be subject of a summary technical report submitted to the Commission approximately 3 months after the conduct of the test. This report shall include a schematic arrangement of the leakage rate measurement system, the instrumentation used, the supplemental test method, and the test program selected as applicable to the initial test, and all subsequent periodic tests. The report shall contain an analysis and interpretation of the leakage rate test data to the extent necessary to demonstrate the acceptability of the containment’s leakage rate in meeting the acceptance criteria.”

“For periodic tests, leakage rate results of Type A, B, and C tests that meet the acceptance criteria of Sections III.A.7, III.B.3, respectively, shall be reported in the licensee’s periodic operating report. Leakage test results of Type A, B, and C tests that fail to meet the acceptance criteria of Sections III.A.7, III.B.3, and III.C.3, respectively, shall be reported in a separate summary report that includes an

analysis and interpretation of the test data, the least squares fit analysis of the test data, the instrument error analysis, and the structural conditions of the containment or components, if any, which contributed to the failure in meeting the acceptance criteria. Results and analyses of the supplemental verification test employed to demonstrate the validity of the leakage rate test measurements shall also be included.”

C. Special Reports

In the event that the Reactor Vessel Overpressure Mitigating System is used to mitigate a RCS pressure transient, submit a Special Report to the Commission within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or the administrative controls on the transient and any corrective action necessary to prevent recurrence.

FOOTNOTES

1. A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.
2. This tabulation supplements the requirements of Section 20.407 of 10 CFR Part 20.
3. A single submittal may be made for a multi-unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

6.8 PROCESS CONTROL PROGRAM AND OFFSITE DOSE CALCULATION MANUAL**A. Process Control Program (PCP)****Changes to the PCP:**

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.5.B.12. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - b. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
2. Shall require review and acceptance by the SNSOC and the approval of the Station Manager prior to implementation.

B. Offsite Dose Calculation Manual (ODCM)**Changes to the ODCM:**

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.5.B.12. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

- b. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
2. Shall require review and acceptance by the SNSOC and the approval of the Station Manager prior to implementation.
3. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Semiannual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 155 TO FACILITY OPERATING LICENSE NO. DPR-32
AND AMENDMENT NO. 154 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 June 29, 1990, the Virginia Electric and Power Company (the licensee) proposed changes to the Technical Specifications (TS) for the Surry Power Station, Units 1 and 2. Specifically, the proposed changes would relocate the Radiological Effluent TS (RETS) to the Offsite Dose Calculation Manual (ODCM) or the Process Control Program (PCP), as appropriate. The proposed changes are in accordance with the guidance provided in NRC Generic Letter (GL) 89-01, dated January 31, 1989. GL 89-01 stated that the NRC would approve a TS amendment to delete RETS if the requirements would be relocated to the ODCM or PCP.

2.0 DISCUSSION

The following changes would be made to the Surry, Units 1 and 2 TS in order to relocate the RETS to the ODCM or PCP.

1. In the index, item 3.11 "Effluent Release" is changed to "Radioactive Gas Storage."
2. In the index, item 4.9, the phrase "Effluent Sampling and Radiation Monitoring System" is changed to "Radioactive Gas Storage Monitoring System."
3. In the index, item 6.9 is deleted.
4. Specification 1.0.M, the ODCM definition, is replaced with item number 1.17 from Enclosure 3 of the Generic Letter, except references to Specifications 6.8.4, 6.9.1.3 and 6.9.1.4 are changed to 6.4, 6.6.B.2 and 6.6.B.3, respectively. The revision reflects the expanded role of the ODCM.
5. Specification 1.0.P, the PCP definition, is replaced with item number 1.22 from Enclosure 3 of the Generic Letter. This adds references to 10 CFR Part 61 and burial ground requirements which were previously included in "other requirements."
6. Section 1.0.R is deleted. The requirements are added to the PCP. Definitions S through W are re-lettered R through V.

Although not reflected in all of the titles, Specifications 3.7, 3.11, 4.1 and 4.9 cover waste gas storage and radioactive effluents. The following changes delete effluent monitoring requirements, which have been added to the ODCM, but retain the gas storage monitoring requirements.

7. The phrase "radioactive liquid and gaseous effluent" in Specification 3.7.E is replaced with "explosive gas."
8. The phrase "and Table 3.7-5(b)" is deleted.
9. The phrase "Specifications 3.11.A.1 and 3.11.B.1" is changed to "Specification 3.11.A.1."
10. The last sentence of 3.7.E, before 3.7.E.1, is deleted.
11. The phrase "a radioactive liquid or gaseous effluent" in 3.7.E.1 is changed to "an explosive gas."
12. The phrase "without delay suspend the release of radioactive liquid or gaseous effluents monitored by the affected channel and" in 3.7.E.1 is deleted.
13. The phrase "or change the setpoint so it is acceptably conservative" in 3.7.E.1 is replaced with "and take the action shown in Table 3.7-5(a)."
14. The phrase "radioactive liquid or gaseous effluent" in Specification 3.7.E.2 is changed to "explosive gas."
15. The phrase "or Table 3.7-5(b)" in 3.7.E.2 is deleted.
16. The phrase "explain in the next Semiannual Radioactive Effluent Release Report" in 3.7.E.2 is replaced with "submit a Special Report to the Commission (Region II) to explain why this."
17. The paragraph titled "Automatic Function Operated from Radiation Monitors" in the bases section, page 3.7-8 is deleted.
18. On page 3.7-9, the paragraph titled "Radioactive Liquid Effluent Monitoring Instrumentation" is deleted.
19. The first two sentences and the title "Radioactive Gaseous Effluent Monitoring Instrumentation" of the next paragraph are deleted from page 3.7-9.
20. In the first sentence on page 3.7-9a, the phrase "This instrumentation also includes provisions" is changed to "Instrumentation is provided."
21. Reference number four on page 3.7-9c is deleted.

22. In Table 3.7-5, items 1, 3, 4 and 7 are deleted. The remaining items are renumbered. References to Specification 4.9 are deleted. The words "and exhaust" are deleted to reflect the removal of the purge exhaust fans by a previous design change.
23. Table 3.7-5(a) is deleted.
24. Table 3.7-5(b) is changed to 3.7-5(a). In the title, "Radioactive Gaseous Effluent Monitoring Instrumentation" is changed to "Explosive Gas Monitoring Instrumentation." Items 1, 3 and 4 and Action items 1, 2 and 3 are deleted and Item 2 is renumbered to Item 1. "Action 4" is renumbered "Action 1." The page number is changed to 3.7-20a, and page 3.7-20b is deleted.
25. The title of Section 3.11 is changed to "Radioactive Gas Storage."
26. The "Applicability" section of 3.11 is changed to: "Applies to the storage of radioactive gases."
27. Under "Objective," "and liquid" is deleted, "released" is changed to "stored" and everything after "released" is deleted.
28. All of 3.11.A and Sections 3.11.B.1 through 3.11.B.4 are deleted.
29. TS 3.11.B.5 is changed to 3.11.A and the subsection labels "i" and "ii" are changed to "a" and "b". A new subsection 2 is added: "The requirements of Specification 3.0.1 are not applicable." The new subsection is needed because Section 3.11.F is being deleted. The specifications are moved to page 3.11-1.
30. TS 3.11.B.6 is changed to 3.11.B and the subsection labels "a" and "b" are changed to "1" and "2." Because Section 3.11.F is being deleted, a new subsection 3 is added: "The requirements of Specification 3.0.1 are not applicable." The specifications are moved to page 3.11-1.
31. Sections 3.11.C through 3.11.F are deleted.
32. In the 3.11 Bases section, all sections except "Explosive Gas Mixture" and "Gas Storage Tanks" are deleted. The remaining sections are moved to page 3.11-2.
33. Table 4.1-1A is deleted.
34. Table 4.1-1B is changed to Table 4.1-1A. The title "Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements" is changed to "Explosive Gas Monitoring Instrumentation Surveillance Requirements." Items 1, 3 and 4 and the "Source Check" column and all frequency footnotes except "D," "M" and "Q" are deleted. Item 2 is renumbered and the page number is changed to 4.1-8c. Page 4.1-8d is deleted.

35. The title of Section 4.9, "Effluent Sampling and Radiation Monitoring System" is changed to "Radioactive Gas Storage Monitoring System."
36. Under "Applicability," "and recording" is deleted and "effluents" is changed to "gas storage."
37. The "Objective" section of 4.9 is changed to "To ascertain that waste gas is stored in accordance with Specification 3.11."
38. Sections 4.9.A through 4.9.E and 4.9.H through 4.9.K are deleted. The requirements have been added to the ODCM.
39. The labels for Sections 4.9.F and 4.9.G are changed to 4.9.A and 4.9.B and they are moved to page 4.9-1. References to Specifications 3.11.B.5 and 3.11.B.6 and Table 3.7-5(b) are changed to 3.11.A, 3.11.B and 3.7-5(a), respectively. Pages 4.9-2 and 4.9-3 are deleted.
40. Tables 4.9-1 through 4.9-5 are deleted. The requirements are added to the ODCM.
41. Two new subsections, N and O, are added to Section 6.4. These are the same as Sections 6.8.4.g and 6.8.4.h of Enclosure 3 of Generic Letter 89-01 except in 6.8.4.g, paragraph 10, which does not apply to PWRs, is deleted and paragraph 11 is renumbered 10. The additions to this section are programmatic requirements which were deleted elsewhere in the TS.
42. A new item number 12 is added to Section 6.5.B: "Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM."
43. Sections 6.6.B.2 and 6.6.B.3 are replaced with the text of Sections 6.9.1.3 and 6.9.1.4, including the addition of footnote 3, from Enclosure 3 of the Generic Letter. The change simplifies the requirements for the Annual Radiological Environmental Operating Report and the Semi-Annual Radioactive Effluent Release Report. Details have been added to the ODCM. The pages in the remainder of Section 6.6 are renumbered.
44. Sections 6.8.A and 6.8.B are replaced with the text of Sections 6.13 and 6.14 of Enclosure 3 of the Generic Letter except all references to Specification "6.10.3.0" are changed to "6.5.B.12" and "URG" is changed to "SNSOC." Also, subsection labels "a," "b" and "c" are changed to "1," "2" and "3" and labels "1" and "2" are changed to "a" and "b."
45. Section 6.9 is deleted. The requirements are added to the PCP.

The following table outlines the disposition of each requirement removed from the Technical Specifications.

SPECIFICATION

ADDITION

1.0.R	PCP
3.7.E, 4.1 and 4.9.A (liquid effluents)	ODCM 6.2.2 TS 6.4.N.1
3.7.E, 4.1 and 4.9.A (gaseous effluents)	ODCM 6.3.2 TS 6.4.N.1
3.11.A.1	ODCM 6.2.1 TS 6.4.N.2-3
3.11.A.2	ODCM 6.2.3 TS 6.4.N.4-5
3.11.A.3	ODCM 6.2.4 TS 6.4.N.6
3.11.B.1	ODCM 6.3.1 TS 6.4.N.3 TS 6.4.N.7
3.11.B.2	ODCM 6.3.3 TS 6.4.N.5 TS 6.4.N.8
3.11.B.3	ODCM 6.3.4 TS 6.4.N.5 TS 6.4.N.9
3.11.B.4	ODCM 6.3.5 TS 6.4.N.6
3.11.C	ODCM 6.4 TS 6.4.N.10
3.11.D.1	ODCM 6.5.1 TS 6.4.0.1
3.11.D.2	ODCM 6.5.2 TS 6.4.0.2
3.11.D.3	ODCM 6.5.3 TS 6.4.0.3
3.11.E	PCP
4.9.B	ODCM 6.2.5
4.9.C	ODCM 6.2.3 ODCM 6.3.3

<u>SPECIFICATION</u>	<u>ADDITION</u>
4.9.D	ODCM 6.2.4 ODCM 6.3.5
4.9.E	ODCM 6.3.1 ODCM 6.3.3 ODCM 6.3.4
4.9.H	ODCM 6.5.1
4.9.I	ODCM 6.5.2
4.9.J	ODCM 6.5.3
4.9.K	PCP
6.6.B.2	ODCM 6.6.1
6.6.B.3	ODCM 6.6.2
6.9	PCP

3.0 EVALUATION

The proposed changes, as discussed above, are based on NRC GL 89-01 dated January 31, 1989. These changes follow the guidance as specified in GL 89-01 for removing RETS to the ODCM or PCP, as appropriate. In addition, the changes do not alter the conditions or assumptions of any accident analysis, as stated in the Surry, Units 1 and 2 Updated Final Safety Analysis Report. Therefore, we find the proposed changes to be acceptable.

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 a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding (56 FR 6882). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). These amendments also

involve changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, with respect to these items, the amendments meet 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 these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Bart Buckley

Date: April 17, 1991