

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

July 28, 2003

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Serial No. 03-353A  
NLOS/GDM R2  
Docket Nos. 50-280, 281  
License Nos. DPR-32, 37

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**PROPOSED TECHNICAL SPECIFICATIONS CHANGE**  
**REVISION OF CORE OPERATING LIMITS REPORT REFERENCES**  
**REQUEST FOR ADDITIONAL INFORMATION**

In a letter dated June 9, 2003 (Serial No. 03-353), Virginia Electric and Power Company (Dominion) requested license amendments, in the form of changes to the Technical Specifications (TS) to Facility Operating Licenses Numbers DPR-32 and DPR-37 for Surry Power Station Units 1 and 2, respectively. The proposed change makes administrative changes to adopt the format for topical report references as described in Industry/Technical Specifications Task Force Traveler, TSTF-363 Rev. 0, "Revised Topical Report References in Improved Technical Specification (ITS) 5.6.5, COLR." During staff review of the TS change request, the NRC determined that additional information was necessary to complete their review. A conference call was held on July 21, 2003, to discuss the staff's questions. At the conclusion of the conference call, Dominion agreed to provide a written response to the NRC's questions. That response is provided in the attachments to this letter.

We have evaluated the TS change request previously submitted with respect to the supplemental information provided herein and have determined that the additional information does not require revision of the No Significant Hazards Consideration or the Environmental Assessment previously provided in our June 9, 2003 submittal.

If you have any further questions or require additional information, please contact Mr. G. D. Miller at (804) 273-2771.

Very truly yours,



Leslie N. Hartz  
Vice President – Nuclear Engineering

Attachments

Commitments made in this letter: None

A001

cc: U.S. Nuclear Regulatory Commission  
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**Attachment 1**

**Response to NRC Request for Additional Information**

**Revision of Core Operating Limits Report References**  
**Technical Specifications Change Request**

**Surry Power Station**  
**Units 1 and 2**

**Virginia Electric and Power Company**  
**(Dominion)**

**RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION**  
**REVISION OF CORE OPERATING LIMITS REPORT REFERENCES**

**SURRY POWER STATION UNITS 1 AND 2**

**NRC Question #1**

*Industry/TSTF Standard Technical Specification Change Traveler 363 (TSTF-363) describes the process for revising the Topical Report references in the Improved Standard Technical Specification 5.6.5, COLR (TS similar to TS 6.2.C for Surry Power Station Units 1 and 2). The TSTF implementation guidance specifies that a requirement be added to the plant technical specifications to alert plant operators that the COLR contains the complete identification for each TS referenced topical report used to prepare the COLR. This insert was not included in the proposed TS pages included in the June 9, 2003, application to implement the provisions of TSTF-363. Please add the appropriate text specified in TSTF-363 as Insert 1 to the draft TS, or provide a justification why this text was omitted.*

**Dominion Response**

The proposed TS change has been revised to include the wording provided in Insert 1 of TSTF-363. A revised marked-up TS page and a revised proposed TS page are included in Attachments 2 and 3, respectively, and should replace the like pages in our June 9, 2003 submittal.

**NRC Question #2**

*As part of the proposed relocation of the topical report information, associated information detailing which limits are associated with each reference was also proposed to be relocated to the COLR. Attachment 1, page 2 of 4 of the June 9, 2003, amendment application discusses the relocation of this information but does not provide a basis why it is acceptable to relocate it to the COLR. The relocation of the associated information detailing which limits are associated with each reference topical report was not evaluated as part of TSTF-363, therefore TSTF-363 cannot be used as a basis for their relocation. Please provide an evaluation of this information detailing why it is appropriate to relocate it to the COLR.*

**Dominion Response**

The relocation of the parenthetical information provided with each topical report reference, detailing which limits are associated with each reference, from the Administrative Controls section of the TS to the Core Operating Limits Report (COLR) is requested to more closely follow the TSTF-363 format for the COLR TS. This information is not required to be included in the TS and should more reasonably be included in the COLR.

The basis for this conclusion is that neither 10 CFR 50.36 nor Generic Letter (GL) 88-16 requires this information to be included in the Technical Specifications.

10 CFR 50.36(c)(5), *Administrative controls*, states that "Administrative controls are the provisions relating to the organization and management, procedures, recordkeeping, review and audit and reporting necessary to assure operation of the facility in a safe manner." The parenthetical information associated with each reference does not meet this definition and is not required to assure safe operation of the plant. Therefore, it is not required to be retained in the TS Administrative Controls section. The information has also been evaluated against the four criteria provided in 10 CFR 50.36(c)(2)(ii)(A) through (D) and does not meet any of the criteria for inclusion in the TS as a limiting condition for operation. This information was included in the TS only as an additional level of detail for each reference and is more suitably included in the COLR where more detailed reference information will be provided consistent with the intent of TSTF-363.

Furthermore, GL 88-16, "Removal of Cycle-Specific Parameter Limits from Technical Specifications," dated October 4, 1988, provided an "...alternative to including the values of cycle-specific parameter limits in individual specifications (that) includes (1) the addition of a new defined term for the formal report that provides the cycle-specific parameter limits, (2) the addition of its associated reporting requirement to the Administrative Controls section of the TS, and (3) the modification of individual specifications to replace these limits with a reference to the defined formal report for these limits."

GL 88-16 specified that if a licensee decided to submit a TS change request to implement the COLR alternative, the analytical methods (i.e., topical reports) used by the licensee and approved by the NRC to determine core operating limits shall be identified in the TS Administrative Controls reporting requirements section. Specifically, the GL required that the NRC-approved topical reports were to be identified by number, title and date, or, as an alternative, the staff's safety evaluation report for a plant-specific methodology by NRC letter and date could be specified. Virginia Electric and Power Company (Dominion) submitted a TS change request to implement a COLR consistent with GL 88-16 requirements in a letter dated July 2, 1993 (Serial No. 93-402). The TS change request included a listing of the NRC-approved topical reports used to determine core operating limits in accordance with the GL requirements. Although not required by the GL, the TS change request also included additional parenthetical statements after each topical report reference that noted the corresponding TS and limit to which the specific reference applied. The TS change request was approved by the NRC in License Amendment Nos. 189/189 dated March 2, 1994 for Surry Units 1 and 2, respectively. However, as noted above, the GL did not require the additional parenthetical information detailing which limits were associated with each topical report reference nor does TSTF-363. Furthermore, a listing of the core operating limits and their associated TS that are defined in the COLR is retained in TS 6.2.C.

Consequently, the parenthetical information included in the REFERENCE section of TS 6.2.C detailing which limits were associated with each reference is not required to be in the TS by either 10 CFR 50.36 or GL 88-16 and is therefore being relocated to the COLR to maintain this information in one location for ease of use and reference and for consistency with TSTF-363.

**Attachment 2**

**Revised Marked-up Technical Specifications Page**

**Surry Power Station  
Units 1 and 2**

**Virginia Electric and Power Company  
(Dominion)**

The analytical methods used to determine the core operating limits identified above shall be those previously reviewed and approved by the NRC, and identified below.

X The core operating limits shall be determined so that applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided for information for each reload cycle to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.

REFERENCES

- 1. VEP-FRD-42, <sup>-A</sup> Rev. ~~1-A~~, "Reload Nuclear Design Methodology," ~~September 1986~~  
~~(Methodology for TS 3.1.E and TS 5.3.A.6.b - Moderator Temperature Coefficient; TS 3.12.A.2 and 3.12.A.3 - Control Bank Insertion Limit; TS 3.12.B.1 and TS 3.12.B.2 - Heat Flux Hot Channel Factor and Nuclear Enthalpy Rise Hot Channel Factor)~~
- 2a. WCAP-9220-P-A, Rev. ~~1~~, "Westinghouse ECCS Evaluation Model - 1981 Version," ~~February 1982~~ (W Proprietary)  
~~(Methodology for TS 3.12.B.1 and TS 3.12.B.2 - Heat Flux Hot Channel Factor)~~
- 2b. WCAP-9561-P-A, ~~ADD-3~~, Rev. ~~1~~, "BART A-1: A Computer Code for the Best Estimate Analysis of Reflood Transients-Special Report: Thimble Modeling in W ECCS Evaluation Model," ~~July 1986~~ (W Proprietary)  
~~(Methodology for TS 3.12.B.1 and TS 3.12.B.2 - Heat Flux Hot Channel Factor)~~
- 2c. WCAP-10266-P-A, Rev. ~~2~~, "The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code," ~~March 1987~~ (W Proprietary)  
~~(Methodology for TS 3.12.B.1 and TS 3.12.B.2 - Heat Flux Hot Channel Factor)~~

The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).

**Attachment 3**

**Revised Proposed Technical Specifications Page**

**Surry Power Station  
Units 1 and 2**

**Virginia Electric and Power Company  
(Dominion)**

The analytical methods used to determine the core operating limits identified above shall be those previously reviewed and approved by the NRC, and identified below. The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements). The core operating limits shall be determined so that applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided for information for each reload cycle to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.

#### REFERENCES

1. VEP-FRD-42-A, "Reload Nuclear Design Methodology"
- 2a. WCAP-9220-P-A, "Westinghouse ECCS Evaluation Model - 1981 Version," (W Proprietary)
- 2b. WCAP-9561-P-A, "BART A-1: A Computer Code for the Best Estimate Analysis of Reflood Transients-Special Report: Thimble Modeling in W ECCS Evaluation Model," (W Proprietary)
- 2c. WCAP-10266-P-A, "The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code," (W Proprietary)
- 2d. WCAP-10054-P-A, "Westinghouse Small Break ECCS Evaluation Model Using the NOTRUMP Code," (W Proprietary)
- 2e. WCAP-10079-P-A, "NOTRUMP, A Nodal Transient Small Break and General Network Code," (W Proprietary)
- 2f. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Report," (Westinghouse Proprietary)
- 3a. VEP-NE-2-A, "Statistical DNBR Evaluation Methodology"
- 3b. VEP-NE-3-A, "Qualification of the WRB-1 CHF Correlation in the Virginia Power COBRA Code"