

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

October 20, 2003

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

Serial No.: 02-721A  
SPS-LIC/TJN R1  
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 REQUEST**  
**ADMINISTRATIVE CHANGES**  
**REQUEST FOR ADDITIONAL INFORMATION**

In a letter dated December 19, 2002 (Serial No. 02-721), Virginia Electric and Power Company (Dominion) requested 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 submittal requested administrative changes to the Technical Specifications to 1) reflect revisions in regulations, 2) correct typographical and editorial errors made in previous TS revisions, and 3) correct TS references to corresponding Updated Final Safety Analysis Report (UFSAR) sections. During review of the TS change request, the NRC staff determined that additional information was necessary to complete their review. On September 4, 2003, the NRC Project Manager for Surry provided the staff's questions associated with the requested TS change. These questions and our proposed responses were discussed during a conference call held on October 2, 2003. At the conclusion of the conference call, we agreed to provide a written response to the NRC's questions. Accordingly, Dominion's response to the staff's questions are provided in the attachment.

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 any revision of the No Significant Hazards Consideration or the Environmental Assessment provided in our original December 19, 2002 submittal.

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

Very truly yours,



Eugene S. Grecheck  
Vice President - Nuclear Support Services

Attachment

4001

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission  
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**ATTACHMENT**

**Response to NRC Request for Additional Information**  
**Proposed Technical Specifications Change**

**Various Administrative Changes**

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

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

**Response to NRC Request for Additional Information**  
**Proposed Technical Specification Change**  
**Various Administrative Changes**

**Surry Power Station Units 1 and 2**

**NRC Question 1**

*In proposed TS 6.1.C.1.f.1.b, 6.1.C.2.g.1, and 6.4C, you replace "safety evaluation" with "regulatory review" or "regulatory evaluation." Is there a difference in these terms? If so, please discuss the differences or propose the use of consistent terminology.*

**NRC Question 2**

*a. In proposed TS 6.1.C.2.g.1 you replace "safety evaluation program" with "safety and regulatory review program." What is the safety and regulatory review program, and where is it described?*

*b. The revised paragraph also states that the:*

*"MSRC shall be responsible for the review of:*

- 1. Regulatory reviews as programmatically discussed in the Updated Final Safety Analysis Report for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to assess the effectiveness of the safety and regulatory review program to verify it is effective in identifying changes that require a license amendment pursuant to Section 50.59, 10 CFR."*

*Where are regulatory reviews defined or discussed in the Surry Units 1 and 2 UFSAR?*

**Response to NRC Questions 1 and 2**

Administrative procedure VPAP-3001, *Safety and Regulatory Reviews* (previously titled *Safety Evaluations*), describes the safety and regulatory review program. VPAP-3001 defines review responsibilities and requirements to determine whether a proposed activity (i.e., changes, tests, and experiments) is safe, and if NRC prior approval is required. Prior to the revision of 10 CFR 50.59 that deleted the term "unreviewed safety question", Dominion's process used a "safety evaluation" to document a "safety review" and to apply the then existing 10 CFR 50.59(c)(2) evaluation criteria when determining if an "unreviewed safety question" existed. This review was normally preceded with the traditional 10 CFR 50.59 screening questions.

Following revision of 10 CFR 50.59, our process, including VPAP-3001, was modified to

accomplish this review by a "safety review" and "regulatory review". The "regulatory review" may begin with a simple screen ("activity screening"), and if the activity "screens in" then a "regulatory screen" (using traditional 10 CFR 50.59 screening questions) is performed. If the activity "screens in" again as a result of the "regulatory screen", then a "regulatory evaluation" is performed by applying the 10 CFR 50.59(c)(2) criteria. This is a stepped approach that permits activities to "screen out" quickly when the activity cannot affect nuclear safety. These terms are defined in VPAP-3001, but are not defined in the UFSAR. The definitions (in part) are as follows:

"Safety Evaluation" - The determination of whether a change, test, or experiment required NRC approval prior to implementation, ... prior to the ...revision of 10 CFR 50.59. This term is no longer used in reference to the current process. The term Regulatory Evaluation replaced the term Safety Evaluation.

Safety Review - The review completed supporting a determination that a change is safe. A Safety Review provides the conclusion that a proposed change, test, or experiment is safe, based on the technical/engineering information that supports the proposed change.

Activity Screening - A process to document that an activity ... does not require a Safety Review or Regulatory Review ... When the responses to the General Screening questions are all "no", it can be concluded that the activity cannot impact nuclear safety and further review against 10 CFR 50.59... is not required.

Regulatory Screen - That part of the change control process where the supporting technical/engineering information is considered in determining if a Regulatory Evaluation is required. The Regulatory Screen ensures the 10 CFR 50.59 change control process examines an activity by applying the definitions of "change," "facility described...," "procedures described...," and "test or experiment not described..." to determine whether a 10 CFR 50.59 Regulatory Evaluation is required prior to implementing the proposed activity.

Regulatory Evaluation - A documented technical evaluation of a proposed change, test, or experiment against the eight criteria in 10 CFR 50.59(c)(2) to determine if the activity requires prior NRC approval via license amendment under 10 CFR 50.90.

Regulatory Review - The process of reviewing changes to the facility described in the UFSAR, changes in the procedures described in the UFSAR, and tests or experiments not described in the UFSAR to determine if these activities can be implemented without obtaining a license amendment. ... A regulatory review will include screening (activity screening and/or a regulatory screen) and/or a regulatory evaluation."

Regulatory reviews are discussed in the Surry Units 1 and 2 UFSAR Section 17.2.1.2.A.1, "Management Safety Review Committee. "

The NRC has previously reviewed Dominion's implementation of the amended 10 CFR 50.59 rule, including evaluations of changes, tests or experiments, and "screened out" changes, and documented their review for Surry Power Station in Integrated Inspection Report Nos. 50-280/01-03 and 50-281/01-03 dated October 26, 2001, and for North Anna Power Station in Integrated Inspection Report Nos. 50-338/02-03 and 50-339/02-03, dated October 28, 2002. The North Anna Inspection Report noted that the inspectors also reviewed the results of the licensee's recent self-assessment of North Anna and Surry Power Stations' implementation of the amended 10 CFR 50.59 rule. Both of these Inspection Reports concluded that no findings of significance were identified.

### **NRC Question 3**

*Attachment 1, pages 2 and 3 of 6 discusses the deletion of a fire protection (FP) pump surveillance included in Table 4.1-2A, Item 9. The discussion indicates that Item 9 was deleted as part of TS Amendments 217/217 dated December 16, 1998. Item 9 on TS page 4.1-9b is not listed in TS Amendments 217/217. Please provide appropriate information justifying this deletion.*

### **Response**

As stated in our December 19, 2002 TS change request submittal, the fire protection (FP) pump surveillance in TS Table 4.1-2A, Item 9, should have been deleted as part of TS Amendments 217/217 dated December 16, 1998. Specifically, our earlier request to relocate fire protection requirements from the TSs to the UFSAR (letter Serial No. 96-104A, dated September 12, 1996) did not identify this surveillance for relocation. Our 1996 TS change request deleted TS Sections 3.21, Fire Protection Features, and 4.18, Fire Detection and Protection System Surveillance, in their entirety, but overlooked deletion of TS Table 4.1-2A, Item 9. The relocation of the fire protection requirements into the UFSAR was permitted by and implemented in accordance with Generic Letters 86-10 and 88-12. The basis accepted in TS Amendments 217/217 continues to apply to this request relative to deletion of Item 9 of TS Table 4.1-2A. The fire protection requirements relocated from the TSs to the UFSAR have been subsequently relocated to the Technical Requirements Manual (TRM). The TRM includes a Technical Surveillance Requirement to verify fire pump start and operation, which is performed on a monthly basis. This TRM requirement is satisfied by performance of the same procedures used to meet the TS Table 4.1-2A, Item 9, requirement for a monthly functional test of the fire protection pump and power supply. Thus, deletion of TS Table 4.1-2A, Item 9, is appropriate.