

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 15, 2004

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555-0001

Serial No. 04-325
NL&OS/SLW R1
Docket Nos. 50-280, 281
50-338, 339
License Nos. DPR-32, 37
NPF-4, 7

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATIONS CHANGE
ADMINISTRATIVE CONTROLS CHANGES

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company (Dominion) hereby request amendments, in the form of changes to the Technical Specifications (TS) and to Facility Operating License Numbers NPF-4 and 7 for North Anna Power Station Units 1 and 2, and DPR-32 and 37 for Surry Power Station Units 1 and 2, respectively. The proposed amendments are administrative in nature and are being requested in order to support the implementation of the proposed Dominion Nuclear Facility Quality Assurance Program (Topical Report DOM-QA-1). The proposed Topical Report was transmitted to the NRC by a letter (Serial No. 04-326) dated August 24, 2004. Review and approval of the enclosed amendment requests is requested in concert with the review and approval of the proposed Topical Report.

The proposed changes are administrative in nature and will change the Administrative Controls section of the current TS to incorporate title changes, change the location where the plant-specific titles and TS titles are correlated and relocate to the Topical Report unit staff qualification requirements. The Surry Administrative Controls TS is also being reworded slightly to be consistent with the wording used in the North Anna TS. In addition, the proposed Surry TS change eliminates descriptions of the onsite and offsite safety review organizations, which have already been moved into the common Topical Report for North Anna and Surry during implementation of Improved Technical Specifications (ITS) for North Anna. The proposed Surry TS change also relocates to more appropriate TS sections the required action for when a Safety Limit is violated.

Dominion has implemented company-wide title changes to promote uniformity in titles throughout the Dominion system. Specifically, the Supervisor Shift Operations title has been changed to Supervisor Nuclear Shift Operations, the Shift Supervisor title has been changed to Shift Manager, the Assistant Shift Supervisor title has been changed to Unit Supervisor and the Control Room Operator – Nuclear has been changed to Control Room Operator. Until these proposed TS changes are approved, personnel will use dual (previous and proposed) titles in conducting their responsibilities. The existing Quality Assurance Program (Topical Report), which is common for both stations, currently contains the correlation between the new titles and the previous TS titles. Station administrative documents will correlate the new titles to the TS functional titles when the proposed TS is approved.

The proposed TS changes are provided in Enclosure 1 for North Anna Power Station Units 1 and 2, and Enclosure 2 for Surry Power Station Units 1 and 2. Within each proposed change, Attachment 1 provides a discussion of the proposed change, Attachment 2 provides the existing TS pages marked-up to show the proposed change, and Attachment 3 provides revised, clean TS pages.

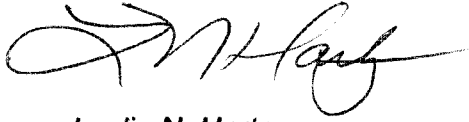
The proposed changes to the North Anna TS are also applicable to the North Anna ISFSI TS. Dominion is submitting the proposed North Anna ISFSI TS changes under separate cover letter (Serial No. 04-273) dated September 15, 2004.

As the changes are applicable to multiple dockets and are similar to administrative changes proposed for Millstone, Dominion requests that the NRC review of the attached license amendment requests be performed by the same staff person(s) and coordinated with the ISFSI amendment request and Topical Report review, in order to facilitate an efficient and consistent review. Approval of the proposed license amendments is requested to be in concert with the approval of the proposed Topical Report (Requested date: March 31, 2005), with the amendments being implemented within six months of approval.

The proposed Technical Specifications changes have been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee. It has been determined that the proposed Technical Specifications changes do not involve a significant hazards consideration as defined in 10 CFR 50.92. The basis for our determination that the changes do not involve a significant hazards consideration is provided in Attachment 1 to Enclosures 1 and 2. We have also determined that the proposed change will not result in any significant increase in the amount of effluents that may be released offsite and no significant increase in individual or cumulative occupational radiation exposure will occur. Therefore, the proposed amendments are eligible for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed change.

If you should have any questions regarding this submittal, please contact Ms. Sheri Tew at 804-741-2368.

Sincerely,



Leslie N. Hartz
Vice President Nuclear Engineering

Commitments made in this letter:

1. There are no commitments made in this letter.

Enclosures:

1. Amendment request for North Anna Power Station Units 1 and 2
2. Amendment request for Surry Power Station Units 1 and 2

cc: US Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W., Suite 23T85
Atlanta, Georgia 30303

Mr. S. R. Monarque
Senior Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 8H12
Rockville, MD 20852-2738

Mr. N. P. Garrett
NRC Senior Resident Inspector
Surry Power Station

Mr. M. T. Widmann
NRC Senior Resident Inspector
North Anna Power Station

Commissioner
Bureau of Radiological Health
1500 East Main Street
Suite 240
Richmond, VA 23218

SN: 04-325
Docket Nos.: 50-280, 281
50-338, 339
Subject: Proposed Technical Specifications Change
Administrative Controls Changes

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Leslie N. Hartz, who is Vice President - Nuclear Engineering, of Virginia Electric and Power Company. She has affirmed before me that she is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of her knowledge and belief.

Acknowledged before me this 15TH day of September, 2004.

My Commission Expires: May 31, 2006.

Vicki L. Hull
Notary Public

(SEAL)

ENCLOSURE 1

**NORTH ANNA POWER STATION
UNITS 1 AND 2**

Technical Specifications Change Request

Administrative Controls Changes

Attachment 1

Discussion of Changes

Attachment 2

Mark-Up of Technical Specifications

Attachment 3

Proposed Technical Specifications

Attachment 1

Discussion of Changes

Dominion

North Anna Power Station Units 1 and 2

DISCUSSION OF CHANGES

Introduction

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company (Dominion) requests a change to Section 5.0, Administrative Controls, of the Technical Specifications (TS) for North Anna Power Station Units 1 and 2. The proposed change is administrative in nature and will revise the Nuclear Business Unit's personnel titles, change the location where the correlation between the TS and plant-specific titles is found and relocate to the Quality Assurance Program the qualification requirements for unit staff.

Background

Consistent with 10 CFR 50 Appendix B requirements, the Nuclear organization and associated position responsibilities are delineated in the Quality Assurance Program (Current UFSAR Chapter 17.2.1, Organization). In addition, the current Technical Specifications Section 5.0, Administrative Controls, delineates organization responsibilities. This change will remove qualification requirements for unit staff from TS since they are also contained in the QA Program (Topical Report). In addition, the change reflects the relocation of the cross-reference between TS functional titles and plant-specific titles from the UFSAR/Quality Assurance Plan to administrative documents. The change also incorporates Dominion company-wide title changes implemented to promote uniformity in titles throughout the Dominion system. Until this proposed TS change is approved and can be implemented as amendments to the operating licenses, personnel will continue to use dual (previous and new) titles to ensure that TS responsibilities are implemented as specified. The Topical Report currently contains the correlation between the new Dominion titles and the current TS titles. Following approval of the proposed change, appropriate administrative documents will contain the correlation between the new functional titles as listed in the TS and plant-specific titles.

Description of Proposed TS Revisions

Attachment 2 contains a mark-up of the specific changes. A discussion of the specific changes is provided below.

- TS 5.1.2 The title Shift Supervisor is being changed to Shift Manager.
- TS 5.2.1.a. The current TS states that the plant-specific titles of personnel fulfilling the responsibilities of the positions delineated in the TS shall be documented in the UFSAR/Quality Assurance Plan. This is being changed to state that these titles will be maintained in appropriate administrative documents.
- TS 5.2.2.e The title of the Supervisor Shift Operations is being changed to Supervisor Nuclear Shift Operations.

TS 5.3.1 The QA Program specifies the training requirements to be met for the unit staff and therefore they are being deleted from the current TS. Specifically, reference to ANSI 3.1 (12/79 Draft) and Regulatory Guide 1.8 is being deleted.

This TS is also being revised to reflect the following Dominion title changes:

- Shift Supervisor to Shift Manager
- Assistant Shift Supervisor to Unit Supervisor
- Control Room Operator – Nuclear to Control Room Operator.

Safety Implications of the Proposed Change

Dominion corporate management proposed changes to Nuclear personnel titles to promote uniformity in titles throughout Dominion. In addition, the change will revise the location where the plant-specific titles and TS titles are correlated and relocate to the Quality Assurance Program unit staff qualification requirements. The overall responsibility for nuclear safety decisions and operational oversight is not being changed. The management reporting structure has not changed and therefore the response to an accident situation has not changed. There are no changes to the unit staff training requirements. There are no changes to the operation of any plant system or its design function during normal or emergency conditions as a result of this change. Furthermore, the current North Anna licensing and design bases are not being changed, nor is the margin of safety assumed in the plant accident analyses being affected. Therefore, the proposed change to the Administrative Controls sections of the Technical Specifications do not create a safety concern.

No Significant Hazards Consideration

Virginia Electric and Power Company (Dominion) is proposing a revision to the North Anna Power Station Units 1 and 2 Technical Specifications to change the Nuclear Business Unit's personnel titles, change the location where the plant-specific titles and TS titles are correlated and relocate to the Quality Assurance Program unit staff qualification requirements. The proposed change is administrative in nature and does not alter the organizational structure and responsibilities as set forth in the Technical Specifications. The change consequently does not affect the operation of the plant or the safety analysis in any way. Dominion has reviewed the requirements of 10 CFR 50.92 as they relate to the proposed Technical Specifications change for North Anna and determined that a significant hazards consideration is not involved. In support of this conclusion, the following evaluation is provided.

Criterion 1 – Operation of North Anna Units 1 and 2 in accordance with the proposed license amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is administrative in nature and does not affect plant systems, structures or components (SSCs) or plant operation during normal or accident conditions. The proposed change only affects the designated titles of personnel, the location of the TS title and plant-specific title correlation, and the location of the unit staff qualification

requirements. Therefore, this change has no bearing on the probability of an accident. Management organizational structure and safety and operational reviews have not changed and there is no change in the method of plant operation, operation review, or system design review. As such, this change does not alter the conclusions of the existing safety analyses and therefore does not alter the consequences of an accident previously evaluated.

Criterion 2 – Operation in accordance with the proposed license amendments would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed administrative change continues to ensure that adequate management oversight exists at the plant in accordance with the existing Technical Specifications. The proposed change only affects the designated titles of personnel, the location of the TS title and plant-specific title correlation, and the location of the unit staff qualification requirements. This change does not impact plant SSCs or plant operation. Management organizational structure and safety and operational reviews have not changed and there is no change in the method of plant operation, operation review, or system design review. There are no new or different accident scenarios, accident initiators, nor failure mechanisms that will be introduced due to this change. Therefore, the proposed change does not create the possibility of an accident of a different type than evaluated previously.

Criterion 3 – Operation in accordance with the proposed license amendments would not involve a significant reduction in a margin of safety.

The proposed change only affects the designated titles of personnel, the location of the TS title and plant-specific title correlation, and the location of the unit staff qualification requirements. This change does not impact plant design, plant operation or any safety margin. Therefore, the proposed change does not significantly reduce a margin of safety.

This evaluation concludes that the proposed amendments to the North Anna Units 1 and 2 Technical Specifications do not involve a significant increase in the probability or consequences of a previously evaluated accident, do not create the possibility of a new or different kind of accident and do not involve a significant reduction in a margin of safety.

Environmental Assessment

Dominion has determined that the proposed change to Section 5.0 Administrative Controls has no affect on plant design or operation. These amendment requests meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) as follows:

- (i) The amendments involve no significant hazards consideration.

As described in the preceding discussion of this evaluation, the proposed change involves no significant hazards consideration.

- (ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed change does not involve the installation of any new equipment, or the modification of any equipment that may affect the types or amounts of effluents that may be released offsite. Therefore, there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed change does not involve plant physical changes, or introduce any new mode of plant operation. Therefore, there is no significant increase in individual or cumulative occupational radiation exposure.

Based on the above, Dominion concludes that the proposed change meets the criteria specified in 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.22 relative to requiring a specific environmental assessment by the Commission.

Conclusion

The Station Nuclear Safety and Operating Committee (SNSOC) and the Management Safety Review Committee (MSRC) have reviewed the proposed amendments and concur that operation with the proposed change does not involve a significant hazards consideration and will not result in an undue risk to the health and safety of the public.

6.0 References

- 6.1 North Anna QA Program (Topical Report), UFSAR Chapter 17.2.1, Organization
- 6.2 10 CFR 50 Appendix B

Attachment 2

Mark-up of Technical Specifications

Dominion

North Anna Power Station Units 1 and 2

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

- 5.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

- 5.1.2 The Shift ~~Supervisor~~^{Manager} (S~~S~~)^M shall be responsible for the control room command function. During any absence of the S~~S~~^M from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the S~~S~~^M from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
-

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the UFSAR/DA Plan, maintained appropriate administrative documents.
- b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

Shall be documented
in the QA Program

5.2 Organization

5.2.2 Unit Staff (continued)

- e. The operations manager shall hold (or have previously held) a Senior Reactor Operator License for North Anna or a similar design Pressurized Water Reactor plant. The Supervisor Shift Operations shall hold an active Senior Reactor Operator License for North Anna Power Station. Nuclear
 - f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
-

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI 3.1 (12/79 Draft) for comparable positions.

as specified
in the
Quality Assurance
Program.

Exceptions to this requirement are specified in VEPCO's QA Topical Report, VEP-1, "Quality Assurance Program, Operational Phase." The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The ~~SR Assistant SS~~ Unit Supervisor Control Room Operator (Nuclear), and the individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the minimum qualifications of 10 CFR 55.59(c) and 55.31(a)(4).

5.3.2 For the purpose of 10 CFR 55.4, a licensed SRO and a licensed RO are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).

Attachment 3

Proposed Technical Specifications

Dominion

North Anna Power Station Units 1 and 2

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

- 5.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

- 5.1.2 The Shift Manager (SM) shall be responsible for the control room command function. During any absence of the SM from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SM from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
-

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the QA Program. The plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be maintained in appropriate administrative documents;
- b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2 Organization

5.2.2 Unit Staff (continued)

- e. The operations manager shall hold (or have previously held) a Senior Reactor Operator License for North Anna or a similar design Pressurized Water Reactor plant. The Supervisor Nuclear Shift Operations shall hold an active Senior Reactor Operator License for North Anna Power Station.
 - f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
-

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications as specified in the Quality Assurance Program. The SM, Unit Supervisor, Control Room Operator, and the individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the minimum qualifications of 10 CFR 55.59(c) and 55.31(a)(4).
- 5.3.2 For the purpose of 10 CFR 55.4, a licensed SRO and a licensed RO are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
-

ENCLOSURE 2

**SURRY POWER STATION
UNITS 1 AND 2**

Technical Specifications Change Request

Administrative Controls Changes

Attachment 1

Discussion of Changes

Attachment 2

Mark-Up of Technical Specifications

Attachment 3

Proposed Technical Specifications

Attachment 1

Discussion of Changes

Dominion

Surry Power Station Units 1 and 2

DISCUSSION OF CHANGES

Introduction

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company (Dominion) requests a change to Section 2.0, Safety Limits and Limiting Safety System Settings, and Section 6.0, Administrative Controls, of the Technical Specifications (TS) for Surry Power Station Units 1 and 2. The proposed change is administrative in nature and will revise the Nuclear Business Unit's personnel titles, replace some plant-specific titles with functional titles and reword the specifications to be consistent with the other Dominion units. In addition, the change will relocate to the Quality Assurance Program Topical Report (Quality Assurance Program) the detailed description of the onsite and offsite safety review organizations and the qualification requirements for non-licensed personnel.

Background

Consistent with 10 CFR 50 Appendix B requirements, organization and associated position responsibilities are delineated in the Quality Assurance Program (current UFSAR Chapter 17.2.1, Organization). In addition, the current Technical Specifications Section 6.0, Administrative Controls, delineates organization responsibilities for safety and operation review. There is currently unnecessary duplication of information in both documents. This change will remove from the TS information that is not required to be contained in TS. Specifically, the qualification requirements for non-licensed staff are removed from TS and are relocated to the Quality Assurance Program. The change also eliminates descriptions of the onsite and offsite safety review organizations which have already been moved into the common Quality Assurance Program during implementation of Improved Technical Specifications (ITS) for North Anna. Additionally, the change will move the required action for when a Safety Limit is violated to more appropriate TS sections. Furthermore, this change will modify Section 6.0, Administrative Controls, of the current TS to more closely match the Administrative Controls sections of the TS for the other Dominion units located at North Anna and Millstone Power Stations. Specifically, the change incorporates functional titles where appropriate with reference to the plant-specific titles as listed in administrative documents. The proposed change also incorporates Dominion company-wide title changes implemented to promote uniformity in titles throughout the Dominion system. Until this proposed TS change is approved, personnel will continue to use dual (previous and new) titles to ensure that TS responsibilities are as specified. The Quality Assurance Program in the UFSAR currently contains the correlation between the new Dominion titles and the current TS titles. Following approval of the proposed change, appropriate administrative documents will contain the correlation between the new functional titles as listed in the TS and plant-specific titles.

Description of Proposed TS Revisions

Attachment 2 contains a mark-up of the specific changes with a change number located in the right-hand column. A discussion of the specific changes is provided below by change number (C#). Minor administrative changes where there is simply rewording of a title or renumbering are not specifically addressed.

- C1 The required action for when a Safety Limit is violated is being moved from current TS Section 6.3 Action To Be Taken if a Safety Limit is Exceeded, and is being placed in the appropriate TS Section 2.1 Safety Limit, Reactor Core and Section 2.2 Safety Limit, Reactor Coolant System Pressure consistent with the location of the limit.
- C2 The purpose of current TS 6.1.A is to specify the person with responsibility for overall plant operation. This proposed change identifies the generic title of the person with the specified responsibility and requires delegation of succession to this responsibility be performed in writing. With this change, the responsibility for overall unit operation is still clearly identified in writing, but delegation requirements are less prescriptive.
- C3 The responsibility of the Shift Manager for the control room command function is added to Section 6.1.1, Responsibility, in addition to being discussed later in new TS 6.1.2.1.b. This addition is for emphasis as to the importance of the position responsibility and for consistency with the North Anna Power Station (NAPS) TS.
- C4 The proposed change to current TS 6.1.A.1 is editorial in that the specified location of the organization requirements is being changed to reference the Quality Assurance Program rather than the UFSAR. The UFSAR currently contains the Quality Assurance Program requirements, but the Quality Assurance Program may be removed from the UFSAR in the future to become a separate document. This change also allows the use of functional titles in the TS with the requirement that plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in TS be documented in the appropriate administrative documents. This change is of no regulatory significance because the administrative relationship of plant-specific titles to functional titles used in TS is not necessary to be included in TS.
- C5 The proposed title changes provide for a more generic designation for the position title while maintaining respective responsibilities. These changes are of no regulatory significance because the responsibilities remain the same, but allow other administrative documents to identify the plant-specific titles associated with the functional titles. The title changes are consistent with North Anna's incorporation of TSTF-65, Rev. 1 during implementation of ITS.
- C6 This proposed change combines the current TS 6.1.A.4 and 6.1.A.5 into new TS 6.1.2.1.d. The purpose of the current TS is to ensure that people responsible for training of the operating staff, quality assurance functions, and health physics

have sufficient organizational freedom and independence from operating pressures to properly address safety considerations. The proposed change is considered not to be regulatory significant because it continues to specify that the necessary flexibility be provided to ensure that individuals with responsibilities in training, quality assurance and health physics can properly address safety issues.

- C7 The specification of qualifications to be met by the non-licensed facility staff is also addressed by the Quality Assurance Program and therefore is being deleted from current TS 6.1.B.1, 6.1.B.3 and the associated footnote. In addition, this change deletes the remainder of the current TS 6.1.B.3 which assigns responsibility for meeting the requirements of 10 CFR 55.59(c) and 55.31(a)(4). Identification of the person responsible for meeting the requirements of 10 CFR 55.59(c) and 55.31(a)(4) is addressed in appropriate plant procedures and processes. This deletion is acceptable because the TS requirement is duplicative of the requirements of 10 CFR 55.59(c) and 55.31(a)(4) which are still required to be met..
- C8 This change is adding a new TS 6.1.3.2 which clarifies the relationship between individuals referenced in 10 CFR 55.4 and 10 CFR 50.54(m). This change is administrative in that it does not result in a technical change to the TS and is consistent with TSTF-258, Rev.4.
- C9 The following administrative changes incorporate new Dominion company-wide titles:
- Supervisor Shift Operations to Supervisor Nuclear Shift Operations
 - Shift Supervisor to Shift Manager
 - Assistant Shift Supervisor to Unit Supervisor
 - Control Room Operator – Nuclear to Control Room Operator.
- C10 The radiation protection technician requirement in current TS 6.1.B.9 is being deleted and incorporated into the referenced current TS 6.1.B.5. (new TS 6.1.2.2.b) to locate associated requirements in one location.
- C11 This proposed change replaces the title Shift Technical Advisor from the key for Table 6.1-1 with a description of the function. This change is administrative in nature and of no regulatory significance. The individual assigned to the responsibilities described still carries out the same tasks, although assigned a different functional title.
- C12 This TS change provides the flexibility for a SRO to also fill the presently designated RO function to assume control room command. This change is acceptable because a person with an SRO license is also qualified to assume the duties of a person with an RO license. This change is considered to be administrative in nature.
- C13 The purpose of current TS 6.1.C, 6.2.A.2, 6.4.C, 6.4.G, 6.8.A.2, and 6.8.B.2 is to specify the function, composition, use of alternatives, meeting frequency, quorum,

responsibilities, authority, and records of the Station Nuclear Safety and Operating Committee (SNSOC) and the Management Safety Review Committee (MSRC) and the use of consultants, reviews and audits for the MSRC. The retention of these details in the TS is not necessary because such administrative specificity is not necessary in the TS to provide adequate protection of public health and safety. Furthermore, the description of how the SNSOC and MSRC are organized and how they conduct their functions has already been moved to the common Topical Report to support implementation of ITS for North Anna Power Station. Inclusion of program requirements in the Quality Assurance Program is an acceptable approach because these types of procedural details will be adequately controlled by the change process for the Quality Assurance Program. The Quality Assurance Program is controlled under 10 CFR 50.54(a)(3) which ensures changes are properly evaluated.

- C14 The purpose of current TS 6.3 is to ensure that Company management, oversight organizations, and the NRC are notified when a Safety Limit is violated. The proposed deletion is reasonable because the regulations adequately specify reporting requirements to the NRC. If a Safety Limit is violated, 10 CFR 50.72 and 10 CFR 50.73 describe required notification and reporting to the NRC. Internal reporting to management and internal oversight organizations should be a management oversight issue and should not be specified as part of Technical Specifications. This change is less restrictive than the existing requirement in that internal reports that would be required under the provisions of this TS will not be required by the TS in the future. However, internal reporting will still be required by company administrative controls.
- C15 This proposed change deletes redundant information regarding independent review and approval. This information is already specified in the Quality Assurance Program.
- C16 TS 6.4.G is being deleted. The requirements of 10 CFR 50.54(x) and (y) adequately address the actions that can be taken in the event of an emergency. Therefore TS 6.4.G is no longer required.

Safety Implications of the Proposed Change

Dominion corporate management proposed changes to Nuclear personnel titles to promote uniformity in titles throughout Dominion. In addition, the removal of plant-specific titles in favor of function titles and the removal of information from Surry TS that is currently contained in the common Topical Report will reduce the maintenance of the Surry TS and provide for more commonality between Surry and the other Dominion units. The overall responsibility for nuclear safety decisions and operational oversight is not being changed. The management reporting structure has not changed and therefore the response to an accident situation has not changed. There are no changes to the operation of any plant system or its design function during normal or emergency conditions as a result of this change. Furthermore, the current Surry licensing and

design bases are not being changed, nor is the margin of safety assumed in the plant accident analyses being affected. Therefore, the proposed change to the Safety Limits and Administrative Controls sections of the Technical Specifications does not create a safety concern.

No Significant Hazards Consideration

Virginia Electric and Power Company (Dominion) is proposing a revision to the Surry Power Station Units 1 and 2 Technical Specifications to change the Nuclear Business Unit's personnel titles, replace some titles with functional titles, reword the specifications slightly to be consistent with the other Dominion units and remove the detailed description of the onsite and offsite safety review organizations. In addition, the required action for when a Safety Limit is violated is being moved to more appropriate TS sections and the associated internal and duplicative NRC reporting requirements are being removed from TS. The qualification requirements for non-licensed staff are also removed from TS. The proposed change is administrative in nature and does not alter the organizational structure and responsibilities as set forth in the Technical Specifications. The change consequently does not affect the operation of the plant or the safety analysis in any way. Dominion has reviewed the requirements of 10 CFR 50.92 as they relate to the proposed Technical Specifications change for Surry and determined that a significant hazards consideration is not involved. In support of this conclusion, the following evaluation is provided.

Criterion 1 – Operation of Surry Units 1 and 2 in accordance with the proposed license amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is administrative in nature and does not affect plant systems, structures or components (SSCs) or plant operation during normal or accident conditions. The proposed change only affects the designated titles of personnel, rewords or relocates requirements within TS or deletes requirements that are either not required to be part of TS or are already required by regulation. The change also relocates the detailed description of the onsite and offsite safety review organizations and non-licensed personnel qualification requirements to the Quality Assurance Program. Therefore, this change has no bearing on the probability of an accident. The management organizational structure and safety and operational reviews have not changed and, therefore, do not impact the ability of operating procedures or administrative controls to prevent or mitigate a previously evaluated accident. As such, this change does not alter the conclusions of the existing safety analyses and therefore does not alter the consequences of an accident previously evaluated.

Criterion 2 – Operation in accordance with the proposed license amendments would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed administrative change continues to ensure that adequate management oversight exists at the plant in accordance with the existing Technical Specifications. The

proposed change only affects the designated titles of personnel, rewords or relocates requirements within TS or deletes requirements that are either not required to be part of TS or are already required per regulation. The change also relocates the detailed description of the onsite and offsite safety review organizations and non-licensed personnel qualification requirements to the Quality Assurance Program. Therefore this change does not impact plant SSCs or plant operation and therefore does not create the possibility of an accident of a different type than evaluated previously. The management organizational structure and safety and operational reviews have not changed. Therefore, there is no change in the method of plant operation, operation review or system design review. There are no new or different accident scenarios, accident initiators, nor failure mechanisms that will be introduced due to this change.

Criterion 3 – Operation in accordance with the proposed license amendments would not involve a significant reduction in a margin of safety.

The proposed change only affects the designated titles of personnel, rewords or relocates requirements within TS or deletes requirements that are either not required to be part of TS or are already required per regulation. The change also relocates the detailed description of the onsite and offsite safety review organizations and non-licensed personnel qualification requirements to the Quality Assurance Program. Consequently, this change does not impact plant design, plant operation or any safety margin and, therefore, does not significantly reduce a margin of safety.

This evaluation concludes that the proposed amendments to the Surry Units 1 and 2 Technical Specifications do not involve a significant increase in the probability or consequences of a previously evaluated accident, do not create the possibility of a new or different kind of accident and do not involve a significant reduction in a margin of safety.

Environmental Assessment

Dominion has determined that the proposed change to Section 2.0 Safety Limits and Limiting Safety System Settings and Section 6.0 Administrative Controls has no affect on plant design or operation. These amendment requests meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) as follows:

- (i) The amendments involve no significant hazards consideration.

As described in the preceding discussion of this evaluation, the proposed change involves no significant hazards consideration.

- (ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed change does not involve the installation of any new equipment, or the modification of any equipment that may affect the types or amounts of effluents that may be released offsite. Therefore, there is no significant change in the types

or significant increase in the amounts of any effluents that may be released offsite.

- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed change does not involve plant physical changes, or introduce any new mode of plant operation. Therefore, there is no significant increase in individual or cumulative occupational radiation exposure.

Based on the above, Dominion concludes that the proposed change meets the criteria specified in 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.22 relative to requiring a specific environmental assessment by the Commission.

The Station Nuclear Safety and Operating Committee (SNSOC) and the Management Safety Review Committee (MSRC) have reviewed the proposed amendments and concur that the proposed change does not involve a significant hazards consideration and will not result in an undue risk to the health and safety of the public.

6.0 References

- 6.1 Surry Quality Assurance Program (Topical Report), UFSAR Chapter 17.2.1, Organization
- 6.2 10 CFR 50 Appendix B