

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

January 31, 2007

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

Serial No. 07-0069
NL&OS/GDM R0
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATIONS CHANGE
MISSED SURVEILLANCE REQUIREMENTS

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company (Dominion) requests amendments, in the form of changes to the Technical Specifications (TS) to Facility Operating License Numbers DPR-32 and DPR-37 for Surry Power Station Units 1 and 2, respectively. The proposed change revises the TS surveillance requirements (SR) for addressing a missed surveillance and is consistent with the NRC-approved Revision 6 of Industry/Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) Change Traveler TSTF-358, *Missed Surveillance Requirements* (TSTF-358). The availability of this TS improvement was published in the Federal Register on September 24, 2001, as part of the NRC's Consolidated Line Item Improvement Process (CLIIP). To facilitate implementation of TSTF-358 into the Surry Units 1 and 2 TS, changes to SRs 4.0.1 and 4.0.3 are also being proposed for consistency with their corresponding improved STS (NUREG-1431, Revision 3, *Standard Technical Specifications Westinghouse Plants*) Sections 3.0.1 and 3.0.3, respectively.

A description and assessment of the proposed amendment is provided in Attachment 1. The marked-up and typed proposed TS pages are provided in Attachments 2 and 3, respectively. The associated Bases changes are provided for information only and will be implemented in accordance with the TS Bases Control Program and 10 CFR 50.59.

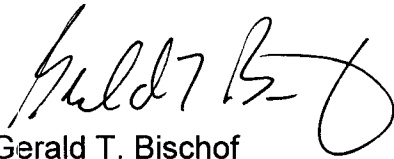
The proposed amendment has been reviewed and approved by the Station Nuclear Safety and Operating Committee. We have also evaluated the proposed TS revisions that are included in the License Amendment Request to facilitate implementation of the TSTF-358 changes and have determined that these additional revisions do not involve a significant hazards consideration as defined in 10CFR50.92. We have also determined that operation with the proposed additional revisions 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. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10CFR51.22(c)(9). Pursuant to 10CFR51.22(b), no environmental impact statement or

environmental assessment is needed in connection with the approval of the proposed change. The bases for these two determinations are provided in Attachment 1.

Dominion requests a 30-day implementation period following NRC approval of the requested license amendments.

If you should have any questions regarding this submittal, please contact Mr. Gary D. Miller at (804) 273-2771.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gerald T. Bischof". The signature is fluid and cursive, with a large loop at the end.

Gerald T. Bischof
Vice President – Nuclear Engineering

Attachments:

1. Description and Assessment
2. Proposed Technical Specifications and Bases Pages (Mark-Up)
3. Proposed Technical Specifications and Bases Pages (Typed)
4. List of Commitments

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COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Gerald T. Bischof, who is Vice President – Nuclear Engineering, of Virginia Electric and Power Company. He has affirmed before me that he 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 his knowledge and belief.

Acknowledged before me this 31ST day of January, 2007.
My Commission Expires: May 31, 2010.

Vicki L. Hull
Notary Public

(SEAL)

Attachment 1

Description and Assessment

**Virginia Electric and Power Company
(Dominion)
Surry Power Station Units 1 and 2**

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

Virginia Electric and Power Company (Dominion) is proposing a license amendment that would revise the Surry Units 1 and 2 Technical Specifications (TS) requirements for addressing missed surveillances in Surveillance Requirement (SR) 4.0.3. The proposed changes are consistent with the Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) change TSTF-358, Revision 6, *Missed Surveillance Requirements* (TSTF-358). The availability of this TS improvement was published in the Federal Register on September 24, 2001, as part of the NRC's Consolidated Line Item Improvement Process (CLIIP). This license amendment request has been prepared in accordance with the NRC's CLIIP and pursuant to the requirements of 10 CFR 50.90.

To facilitate implementation of TSTF-358 into the Surry TS, SRs 4.0.1 and 4.0.3 and their associated Bases require revision for consistency with their corresponding improved STS [NUREG-1431, Rev. 3, *Standard Technical Specifications Westinghouse Plants*] Sections 3.0.1 and 3.0.3, respectively, to address how a surveillance is met and to specify the actions required for a missed surveillance.

A TS Bases Control Program, required for implementation of TSTF-358, was previously incorporated into the Surry TS by License Amendments 243/242 dated July 15, 2005.

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Dominion has reviewed the safety evaluation dated June 14, 2001, published as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-358 provided in Federal Register Notices, Vol. 66, Nos. 115 and 189 dated June 14 and September 28, 2001, respectively. Dominion concludes that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Surry Power Station, Units 1 and 2. Incorporation of the proposed changes into the Surry Power Station Units 1 and 2 TS are justified based on this generic application.

2.2 Optional Changes and Variations

Dominion is not proposing any variations or deviations from the intent of the TS changes described in the TSTF-358, Revision 6, or the NRC staff's model safety evaluation dated June 14, 2001. However, to ensure consistent implementation of TSTF-358 with the justification and safety analysis provided, Dominion is also revising Surry TS SR 4.0.1 and SR 4.0.3 and their associated Bases for consistency with their

corresponding improved STS Sections 3.0.1 and 3.0.3, respectively, to address how a surveillance is met and to specify the actions required for a missed surveillance. Minor variations/deviations in the TS terminology used in NUREG-1431 and TSTF-358 are required because Surry Power Station's Units 1 and 2 TS are custom TS and the wording does not directly correspond to the improved STS and TSTF-358 wording in every instance. For example, the Surry TS do not use the improved STS terms MODE, Completion Times or Required Actions, rather they use the corresponding terms REACTOR OPERATION, Allowed Outage Times and Action Statements instead. These and similar terminology variations/deviations from TSTF-358 and STS SR 3.0.1 and 3.0.3 wording are necessary to ensure that the language used in the proposed License Amendment Request is consistent with the terminology used throughout Surry's custom TS. However, the minor variations/deviations from the specific wording included in the NUREG/CLIP do not change the intent of the TS, Bases or CLIP. The terminology differences are summarized in Attachment A for your reference.

The variations/deviations in TS terminology are consistent with the wording used in similar License Amendment Requests submitted by Florida Power and Light (FP&L) on November 21, 2001 (ML013320088), as supplemented on January 25, 2002 (ML020290087) and August 15, 2002 (ML022330463), and Omaha Public Power District on July 22, 2002 (ML022130581), as supplemented on October 8, 2002 (ML022900058). The NRC approved the License Amendment Requests for these two licensees in letters dated November 4, 2002 (ML023080336) and January 16, 2003 (ML030220153), respectively.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Dominion has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register Notice, Vol. 66, dated June 14, 2001 as part of the CLIP and has concluded that the proposed NSHCD is applicable to Surry Power Station Units 1 and 2 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

Dominion has also evaluated whether a significant hazards consideration is involved by incorporating the wording of improved STS Surveillance Requirement (SR) 3.0.1 and SR 3.0.3, as specified in NUREG-1431, into Surry TS SR 4.0.1 and SR 4.0.3, respectively. This change has been made to the extent practical to facilitate the incorporation of Industry/Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) change TSTF-358, Revision 6, regarding missed surveillance requirements. Based on this evaluation, Dominion has determined that no significant hazards consideration exists based on the following:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change to incorporate the requirements of improved STS SR 3.0.1 and SR 3.0.3 into corresponding Surry TS SR 4.0.1 and SR 4.0.3, respectively, does not affect the design or operation of the plant. The proposed change involves revising the existing Surry custom TS to be consistent with NUREG-1431, Revision 3, to facilitate the incorporation of TSTF-358 into the TS. The proposed change involves no technical changes to the existing TS as it merely clarifies how SRs are met. As such, these changes are administrative in nature and do not affect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change to incorporate the requirements of improved STS SR 3.0.1 and SR 3.0.3 into corresponding Surry TS SR 4.0.1 and SR 4.0.3, respectively, does not involve a physical alteration to the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The proposed change revises the existing Surry TS to be consistent with NUREG-1431, Revision 3, to clarify how SRs are met and facilitates the incorporation of TSTF-358 for addressing missed surveillances. As such, the proposed change will not impose any new or different requirements or eliminate any existing requirements. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

The proposed change to incorporate the requirements of improved STS SR 3.0.1 and SR 3.0.3 into corresponding Surry TS SR 4.0.1 and SR 4.0.3, respectively, does not affect plant operation or safety analysis assumptions in any way. The change provides additional clarification on how a surveillance is met and facilitates the incorporation of TSTF-358 for addressing missed surveillances. The change is administrative in nature and does not affect the operation of safety-related systems, structures, or components. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

3.2 Verification and Commitments

As discussed in the notice of availability published in the *Federal Register* on September 24, 2001, for this TS improvement, plant-specific verifications were performed as follows:

As noted above, to facilitate implementation of TSTF-358, Dominion is also incorporating the wording from the improved STS SR 3.0.1 and SR 3.0.3 and their associated Bases, into corresponding Surry TS SR 4.0.1 and SR 4.0.3, respectively, as well as the changes included in TSTF-358.

Furthermore, Dominion has established TS Bases for SR 4.0.3 which state that the use of the delay period established for SR 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of a missed surveillance.

The proposed revision will also include changes to the Bases for SR 4.0.3 that provide detail on how to implement the new requirements. The Bases changes provide guidance for surveillance frequencies that are not based on time intervals but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the Bases state that a missed surveillance test is expected to be performed at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The Bases also state that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, *Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants*. The missed surveillance should then be treated as an emergent condition, as discussed in Regulatory Guide 1.182. In addition, the Bases state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that a missed surveillance for an important component should be analyzed quantitatively. The Bases also state that the results of the risk evaluation determine the course of action. In addition, the Bases state that all missed surveillance tests will be placed in the licensee's corrective action program. Finally, the Surry TS currently include a TS Bases Control Program in TS 6.4.J that is consistent with Section 5.5 of the improved STS.

4.0 ENVIRONMENTAL EVALUATION

4.1 Incorporation of TSTF-358, Revision 6

Dominion has reviewed the environmental evaluation associated with TSTF-358 included in the model safety evaluation dated June 14, 2001, as part of the CLIP. Dominion has concluded that the staff's findings presented in that evaluation are applicable to Surry Power Station Units 1 and 2, and the evaluation is hereby incorporated by reference for this application.

4.2 Incorporation of Improved Standard Technical Specification Wording for Surry TS SR 4.0.1 and 4.0.3

Dominion has further determined that the revision of Surry TS SR 4.0.1 and SR 4.0.3 and their associated Bases to make them consistent with NUREG-1431, Revision 3, will not result in any significant increases in the amounts of any effluents that may be released offsite or any significant increases in individual or cumulative occupational radiation exposure. The proposed change is administrative in nature, and, as such, does not affect the operation of the plant. Therefore, the proposed change is 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 as the proposed administrative change will not result in an undue risk to the health and safety of the public.

Attachment A

ITS Section	Surry TS Section	<u>Variation from ITS and/or the TSTF-358 Wording for Surry Power Station Units 1 and 2 Custom TS</u>
SR 3.0.1	SR 4.0.1	<ul style="list-style-type: none"> • The word MODES is changed to the term REACTOR OPERATION conditions since Surry TS do not use the MODE convention to describe reactor operation parameters or include it as a defined TS term. • The term Applicability for individual LCOs is changed to individual Limiting Conditions for Operation (LCO) since the TS term Applicability is not consistently used in the same manner in Surry TS as it is in STS.
SR 3.0.3	SR 4.0.3	<ul style="list-style-type: none"> • The term Condition(s) must be entered is changed to action(s) must be taken since Surry TS use Action Statements as opposed to Conditions.
SR 3.0.1 Bases	SR 4.0.1 Bases	<ul style="list-style-type: none"> • The word MODE(S) is changed to the term REACTOR OPERATION condition(s) since Surry does not use the MODE convention to describe reactor operation parameters or include it as a defined TS term. • The term Applicability for which the requirements of the LCO apply is changed to individual Limiting Conditions for Operation (LCO) that apply since the TS term Applicability is not consistently used in the same manner in Surry TS as it is in STS. • The sentence at the end of the first paragraph of STS SR 3.0.1 Bases, which states, “Additionally, the definitions related to instrument testing (e.g., CHANNEL CALIBRATION) specify that these tests are performed by means of any series of sequential, overlapping, or total steps,” is not included in the Surry TS SR 4.0.1 Bases since the Surry TS do not contain such wording in the instrument testing definitions contained in TS 1.0. • The terms Required Action(s) and ACTIONS are changed to Action Statements for consistency with Surry TS terminology.

		<ul style="list-style-type: none"> • The word Applicability is changed to individual LCO in the sixth paragraph, since the TS term Applicability is not consistently used in the same manner in Surry TS as it is in STS. • The high pressure safety injection example is not included since it is not applicable to Surry. The auxiliary feedwater turbine pump testing example is retained but revised slightly in consideration of the specific testing conditions included in Surry's TS (reference Surry TS 4.8.A.3.a.)
<p>SR 3.0.3 Bases</p>	<p>SR 4.0.3 Bases</p>	<ul style="list-style-type: none"> • The term Required Actions is changed to Action Statement(s) for consistency with Surry TS terminology. • The terms MODE 1 and MODE have been changed to POWER OPERATION and REACTOR OPERATION condition, respectively, since Surry TS do not use the MODE convention to describe reactor operation parameters or include MODE 1 or MODE as defined terms. • The terms Completion Times of the Required Actions and Completion Time of the ACTIONS have been changed to Allowed Outage Time(s) of the Action Statements for consistency with Surry TS terminology.

Attachment 2

Proposed Technical Specifications and Bases Pages (Mark-up)

**Virginia Electric and Power Company
(Dominion)
Surry Power Station Units 1 and 2**

4.0 SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance requirements provide for testing, calibrating, or inspecting those systems or components which are required to assure that operation of the units or the station will be as prescribed in the preceding sections.

INSERT 1

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4.0.2 Surveillance requirement specified time intervals may be adjusted plus or minus 25 percent to accommodate normal test schedules.

4.0.3 Failure to perform a surveillance requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The time limits of the Action Statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The Action Statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the Action Statement requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.

INSERT 2

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4.0.4 Entry into an operational condition shall not be made unless the surveillance requirement(s) associated with a Limiting Condition of Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to operational conditions as required to comply with Action Statement requirements.



BASES

INSERT 3

4.0.1 This specification provides that surveillance activities necessary to ensure the Limiting Conditions for Operation are met and will be performed during all operating conditions for which the Limiting Conditions for Operation are applicable.

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4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities.

INSERT 4

4.0.3 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the operability requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when surveillance requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the surveillance requirements. This specification also clarifies that the Action Statement requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the Action Statement requirements apply from the point in time it

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is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the surveillance requirement within the allowable outage time limits of the Action Statement requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the operability requirements of a Limiting Condition for Operation. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B), unless it meets an exception listed therein, because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the Action Statement requirements are less than 24 hours or a shutdown is required to comply with Action Statement requirements, e.g., Specification 3.0.1, a 24 hour allowance is provided to permit a delay in implementing the Action Statement requirements. This provides an adequate time limit to complete surveillance requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with Action Statement requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This

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provision also provides a time limit for the completion of surveillance requirements that become applicable as a consequence of condition changes imposed by Action Statement requirements and for completing surveillance requirements that are applicable when an exception to the requirements of Specifications 4.0.4 is allowed. If a surveillance is not completed within the 24 hour allowance, the time limits of the Action Statement requirements are applicable at that time. When a surveillance is performed within the 24 hour allowance and the surveillance requirements are not met, the time limits of the Action Statement requirements are applicable at the time that the surveillance is terminated.

Surveillance requirements do not have to be performed on inoperable equipment because the Action Statement requirements define the remedial measures that apply. However, the surveillance requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

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- 4.0.4 This specification establishes the requirement that all applicable surveillances must be met before entry into an operational condition specified in the applicability statement. The purpose of this specification is to ensure that system and component operability requirements or parameter limits are met before entry into a condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in operational conditions associated with plant shutdown as well as startup.

INSERT 1 - Completely replaces SR 4.0.1

Surveillance Requirements (SRs) shall be met during the REACTOR OPERATION conditions or other specified conditions in the individual Limiting Conditions for Operation (LCO), unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified frequency shall be failure to meet the LCO except as provided in SR 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

INSERT 2 - Completely replaces existing SR 4.0.3

If it is discovered that a Surveillance was not performed within its specified frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable action(s) must be taken.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable action(s) must be taken.

INSERT 3 - Completely replaces SR 4.0.1 Bases

Surveillance Requirement (SR) 4.0.1 establishes the requirement that SRs must be met during the REACTOR OPERATION conditions or other specified conditions in the individual Limiting Conditions for Operation (LCO) that apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the operability of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified frequency, in accordance with SR 4.0.2, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified frequency.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or

- b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a REACTOR OPERATION condition or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a test exception are only applicable when the test exception is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given REACTOR OPERATION condition or other specified condition.

Surveillances, including Surveillances invoked by Action Statements, do not have to be performed on inoperable equipment because the Action Statements define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 4.0.2. Post maintenance testing may not be possible in the current REACTOR OPERATION condition or other specified conditions in the individual LCO due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a REACTOR OPERATION condition or other specified condition where other necessary post maintenance tests can be completed.

An example of this process is Auxiliary Feedwater (AFW) pump turbine maintenance during refueling that requires testing at steam pressures that cannot be obtained until the unit is at HOT SHUTDOWN conditions. However, if other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.

INSERT 4 - Completely replaces existing Bases for SR 4.0.3

SR 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that

it is discovered that the Surveillance has not been performed in accordance with SR 4.0.2, and not at the time that the specified Surveillance frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with the Action Statement(s) or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering POWER OPERATION after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 4.0.3 allows for the full delay period of up to the specified frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of REACTOR OPERATION condition changes imposed by Action Statements.

Failure to comply with the specified frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed

Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Allowed Outage Time(s) of the Action Statement(s) for the applicable LCO conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Allowed Outage Time(s) of the Action Statement(s) for the applicable LCO conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Allowed Outage Time(s) of the Action Statement(s), restores compliance with SR 4.0.1

Attachment 3

Proposed Technical Specifications and Bases Pages (Typed)

**Virginia Electric and Power Company
(Dominion)
Surry Power Station Units 1 and 2**

TABULATION OF CHANGES

License Nos. DPR-32 & 37 / Docket Nos. 50-280 & 281

Summary of Change:

The proposed change to the Surry Power Station Units 1 and 2 Technical Specifications and Bases incorporates Industry/Technical Specification Task Force (TSTF) Standard Technical Specifications change TSTF-358, Revision 6, *Missed Surveillance Requirements*, and revises TS SRs 4.0.1 and 4.0.3 and their associated Bases for consistency with improved Standard Technical Specifications (NUREG-1431, Rev. 3) and to facilitate incorporation of TSTF-358.

<u>DELETE</u>	<u>DATED</u>	<u>SUBSTITUTE</u>
TS 4.0-1	03-12-93	TS 4.0-1
TS 4.0-2	07-15-05	TS 4.0-2
TS 4.0-3	07-15-05	TS 4.0-3
TS 4.0-4	07-15-05	TS 4.0-4
TS 4.0-5	07-15-05	TS 4.0-5

4.0 SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements (SRs) shall be met during the REACTOR OPERATION conditions or other specified conditions in the individual Limiting Conditions for Operation (LCO), unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified frequency shall be failure to meet the LCO except as provided in SR 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Surveillance requirement specified time intervals may be adjusted plus or minus 25 percent to accommodate normal test schedules.

4.0.3 If it is discovered that a Surveillance was not performed within its specified frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable action(s) must be taken.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable action(s) must be taken.

4.0.4 Entry into an operational condition shall not be made unless the surveillance requirement(s) associated with a Limiting Condition of Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to operational conditions as required to comply with Action Statement requirements.

BASES

4.0.1 Surveillance Requirement (SR) 4.0.1 establishes the requirement that SRs must be met during the REACTOR OPERATION conditions or other specified conditions in the individual Limiting Conditions for Operation (LCO) that apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the operability of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified frequency, in accordance with SR 4.0.2, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified frequency.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or
- b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a REACTOR OPERATION condition or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a test exception are only applicable when the test exception is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given REACTOR OPERATION condition or other specified condition.

Surveillances, including Surveillances invoked by Action Statements, do not have to be performed on inoperable equipment because the Action Statements define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 4.0.2. Post maintenance testing may not be possible in the current REACTOR OPERATION condition or other specified conditions in the individual LCO due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a REACTOR OPERATION condition or other specified condition where other necessary post maintenance tests can be completed.

An example of this process is Auxiliary Feedwater (AFW) pump turbine maintenance during refueling that requires testing at steam pressures that cannot be obtained until the unit is at HOT SHUTDOWN conditions. However, if other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.

- 4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase “at least” associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities.
- 4.0.3 SR 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 4.0.2, and not at the time that the specified Surveillance frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with the Action Statement(s) or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering POWER OPERATION after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 4.0.3 allows for the full delay period of up to the specified frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of REACTOR OPERATION condition changes imposed by Action Statements.

Failure to comply with the specified frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use

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quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Allowed Outage Time(s) of the Action Statement(s) for the applicable LCO conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Allowed Outage Time(s) of the Action Statement(s) for the applicable LCO conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Allowed Outage Time(s) of the Action Statement(s), restores compliance with SR 4.0.1.

- 4.0.4 This specification establishes the requirement that all applicable surveillances must be met before entry into an operational condition specified in the applicability statement. The purpose of this specification is to ensure that system and component operability requirements or parameter limits are met before entry into a condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in operational conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable surveillance requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

Exceptions to Specification 4.0.4 allow performance of surveillance requirements associated with a Limiting Condition for Operation after entry into the applicable operational condition.

When a shutdown is required to comply with Action Statement requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower condition of operation.

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Attachment 4

List of Commitments

**Virginia Electric and Power Company
(Dominion)
Surry Power Station Units 1 and 2**

LIST OF COMMITMENTS
SURRY POWER STATION UNITS 1 AND 2

The following table identifies those actions committed to by Dominion in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct any questions regarding these commitments to Mr. Gary D. Miller at (804) 273-2771.

Commitment	Due Date/Event
Dominion will establish the Technical Specifications Bases for SRs 4.0.1 and 4.0.3 as adopted with the applicable license amendment.	To be implemented with the amendment.