

UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION II SAM NUNN ATLANTA FEDERAL CENTER 61 FORSYTH STREET, SW, SUITE 23T85 ATLANTA, GEORGIA 30303-8931

September 14, 2007

Virginia Electric and Power Company ATTN: Mr. David A. Christian Sr. Vice President and Chief Nuclear Officer Innsbrook Technical Center - 2SW 5000 Dominion Boulevard Glen Allen, VA 23060-6711

SUBJECT: SURRY POWER STATION - INSPECTION REPORT NOS. 05000280/2007006; 05000281/2007006; AND 07200055/2007001

Dear Mr. Christian:

This inspection report covers two visits made by the United States Nuclear Regulatory Commission (NRC) to your Surry Power Station Independent Spent Fuel Storage Installation (ISFSI) between June 18 and August 3, 2007. The purpose of the site visits was to inspect your dry fuel storage pre-operational testing activities and to observe your first loading of the NUHOMS-HD storage system. The first NUHOMS-HD canister was loaded and placed in storage at the ISFSI on August 6, 2007. The enclosed inspection report documents the results of the inspection, which were discussed on August 2, 2007, with Mr. B. L. Stanley and other members of your staff. Based on results of this inspection, no violations or findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the Publically Available Records (PARS) component of NRC's document system

VEPCO

(ADAMS). ADAMS is accessible from the NRC Web site at <u>http://www.nrc.gov/reading-rm/adams.html.</u> (The Public Electronic reading Room).

Sincerely,

/**RA**/

Steven Vias, Chief Technical Support Branch Division of Reactor Projects

Docket Nos.: 50-280; 50-281; 72-055 License Nos.: DPR-32, DPR-37

Enclosure:

Surry Power Station - Independent Spent Fuel Storage Installation(ISFSI) Dry Run and Initial Loading Inspection Report

Attachments: 1. Supplemental Information

2. Inspector Notes

(ADAMS). ADAMS is accessible from the NRC Web site at <u>http://www.nrc.gov/reading-rm/adams.html.</u> (The Public Electronic reading Room).

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SUNSI Review Completed:	SPA	ADAMS:	Yes 🗆 No	Initials: <u>SPA</u>
■ Publicly Available □ No	n-Publicly	y Available	□ Sensitive ■	Non-Sensitive

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cc w/encl: Chris L. Funderburk, Director Nuclear Licensing and Operations Support Virginia Electric & Power Company Electronic Mail Distribution

Donald E. Jernigan Site Vice President Surry Power Station Virginia Electric & Power Company Electronic Mail Distribution

Virginia State Corporation Commission Division of Energy Regulation P. O. Box 1197 Richmond, VA 23209

Lillian M. Cuoco, Esq. Senior Counsel Dominion Resources Services, Inc. Electronic Mail Distribution

Attorney General Supreme Court Building 900 East Main Street Richmond, VA 23219

VEPCO

Report to David A. Christian from Steven J. Vias dated September 14, 2007

SUBJECT: SURRY POWER STATION - INSPECTION REPORT NOS. 05000280/2007006; 05000281/2007006; AND 07200055/2007001

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U.S. NUCLEAR REGULATORY COMMISSION REGION IV

Docket Nos.:	50-280, 50-281, 72-055		
License:	DPR-32, DPR-37		
Report No:	05000280/2007006; 05000281/2007006; and 07200055/2007001		
Licensee:	Virginia Electric and Power Company (VEPCO)		
Facility:	Surry Power Station, Units 1 & 2		
Location:	5850 Hog Island Road Surry, VA 23883		
Dates:	June 18 through August 3, 2007		
Inspectors:	Scott Atwater Emilio Garcia Mark Sitek Steven Vias Michael Karmis Bhasker (Bob) Tripathi Zahira Cruz-Perez	Region IV DNMS Inspector - Team Leader Region IV DNMS Inspector Region IV Resident Inspector - San Onofre Region II DRS Inspector SFST Senior Safety Inspector SFST Technical Review Directorate SFST Technical Review Directorate	
Crane Licensing Research:	Ray Kellar, P.E.	Region IV DNMS Inspector	
Approved By:	Steven Vias, Chief Technical Support Branch Division of Reactor Projects		
Attachments:	Supplemental Information Inspector Notes		

EXECUTIVE SUMMARY

Surry Power Station NRC Inspection Report 05000280/2007006; 05000281/2007006; and 07200055/2007001

Virginia Electric and Power Company (VEPCO) had selected the NUHOMS-HD Horizontal Modular Storage System for dry storage of spent nuclear fuel at the Surry Power Station. The Nuclear Regulatory Commission (NRC) had certified the NUHOMS-HD cask system for storage of irradiated fuel under Certificate of Compliance No. 72-1030 on January 10, 2007.

On June 18-22, 2007, a team of 7 inspectors performed two evaluations. The first evaluation was to determine if the ISFSI personnel had been trained, the equipment had been tested, and the procedures had been developed to the extent necessary to safely load spent fuel into dry storage at the ISFSI. The second evaluation was to determine if the Surry station programs were adequate for continued maintenance and operation of the ISFSI once it was loaded. The results of these two evaluations were discussed during a debriefing on June 22, 2007, with Mr. Ken Grover and other members of the staff.

On July 23-27, 2006, a Region IV DNMS inspector performed two evaluations. The first was to determine if the Spent Fuel Cask Crane was in condition to safely handle the loaded transfer cask. The second evaluation was to determine if the deficiencies identified during the team evaluation conducted on June 18-22, 2007, had been adequately resolved and closed. The results of these two evaluations were discussed during a debriefing on July 26, 2007, with Mr. Matt Adams and other members of the staff.

On July 30 through August 3, 2007, a Region IV DNMS inspector observed the first loading of spent fuel into dry storage using the NUHOMS Storage System. The purpose was to verify the first loading was performed safely, in accordance with approved procedures, and within the Technical Specification limits. The results of this evaluation were discussed during the exit meeting on August 2, 2007, with Mr. B. L. Stanley and other members of the staff.

The following provides a summary of the results of the inspection. Details are provided in the Inspector Notes contained in Attachment 2 to this report.

Spent Fuel Cask Crane

- The crane design features for load control were intact, operable, and properly rated for the application. The design features included the hoist and trolley brakes, crane remote control system, and hoist minimum wire rope breaking strength (Attachment 2, Crane Design, Pages 1-2).
- The crane, hooks, and wire rope were inspected and maintained in accordance with the ASME Code and the crane manufacturer's instructions (Attachment 2, Crane Inspection/Maintenance, Pages 3-6).
- The crane configuration had been maintained in conformance with its licensing basis (Attachment 2, Crane Licensing Basis, Pages 6-7).

• The crane had been load tested and operated in accordance with the ASME Code (Attachment 2, Crane Load Testing and Crane Operation, Pages 8-11).

Canister Drying and Helium Backfill Operations

• The canister was vacuum dried and backfilled with helium to the pressures specified by Technical Specifications. The drying and backfilling operations were completed within the time limits specified (Attachment 2, Drying/Helium Backfill, Pages 12-13).

Emergency Planning

 The Emergency Plan had been expanded to include the ISFSI. Emergency Action Levels (EALs) had been developed for accidents involving the ISFSI. (Attachment 2, Emergency Planning, Pages 13-14).

Fire Protection

• The Fire Protection Plan had been expanded to include the ISFSI, and emergency response training had been provided for off-site responders (Attachment 2, Fire Protection, Page 14).

Fuel Selection and Verification

- The spent fuel assemblies selected for loading into the first NUHOMS-HD canister met the Technical Specification requirements for assembly type, cladding integrity, decay heat load, and physical design characteristics (Attachment 2, Fuel Selection/Verification, Pages 15-17).
- A canister loading plan had been developed based on the combination of spent fuel assembly enrichment, burnup, cooling time and decay heat (Attachment 2, Fuel Selection/Verification, Page 17).
- The non-fuel assembly hardware (NFAH) selected for loading into the first NUHOMS-HD canister met the Technical Specification requirements for burnup and decay heat load (Attachment 2, Fuel Selection/Verification, Page 18).
- The Technical Specification actions required for spent fuel mis-loading had been incorporated into the loading procedure (Attachment 2, Fuel Selection/Verification, Page 18).

General License Conditions

- The NUHOMS-HD cask design was compatible with the Surry Power Station 10 CFR Part 50 requirements. There were no items identified that required NRC review or approval prior to use of the NUHOMS-HD system (Attachment 2, General License, Page 19).
- The licensee had calculated the dose to the public at the site boundary from a worst case accident during ISFSI operations. The dose was within the limits allowed by 10 CFR 72.106 (Attachment 2, General License, Page19).

Enclosure

- The licensee had calculated the dose to the public at the site boundary from normal ISFSI operations. The dose was within the limits allowed by 10 CFR 72.104 (Attachment 2, General License, Page 20).
- The soil structure under the ISFSI pad was determined not to be subject to liquefaction during a Safe Shutdown Earthquake (Attachment 2, General License, Page 21).
- The Horizontal Storage Modules (HSMs) were placed on the ISFSI pad in an array that was consistent with the Technical Specifications (Attachment 2, General License, Page 21).
- The NUHOMS-HD cask system design parameters were bounded by the Surry Power Station reactor site parameters (Attachment 2, General License, Pages 21-24).

Heavy Loads and Rigging

- All lifts of the transfer cask and canister were made under the Surry Power Station heavy loads requirements and procedures, as documented through a 10 CFR 50.59 evaluation (Attachment 2, Heavy Loads and Rigging, Page 25).
- A safe load path had been established for transfer cask movements, meeting the requirements of NUREG 0612 (Attachment 2, Heavy Loads and Rigging, Page 25).
- Maximum lifting heights had been established for the transfer cask to ensure that a drop would not result in dose rates at the site boundary in excess of the 10 CFR Part 100 limits. These lifting heights were consistently implemented during the first NUHOMS cask system loading (Attachment 2, Heavy Loads and Rigging, Page 26).

Procedures and Technical Specifications

• Procedures were established to ensure that the NUHOMS-HD cask storage system technical specification requirements for inspection, maintenance, operation and surveillance were implemented. These procedures were implemented during the first NUHOMS cask system loading (Attachment 2, Procedures and Tech Specs, Pages 27-29).

Quality Assurance

 The licensee's 10 CFR Part 50 Quality Assurance Program had been expanded to include the ISFSI. The licensee had established measures for ensuring that: instruments used to verify compliance with the Technical Specifications were calibrated; conditions adverse to quality were promptly identified and corrected; dry fuel storage components were properly stored to prevent degradation; and purchased material equipment and services conformed to procurement documents (Attachment 2, Quality Assurance, Pages 30-32).

Radiation Protection

- Measures were established to limit personnel exposures to as low as reasonably achievable (ALARA). Considerations for exposure and contamination control had been incorporated into the procedures for canister gas sampling and reflooding during unloading. The transfer cask annulus seal survey was accomplished in the proper sequence to ensure the canister did not exit the building with contamination above the limits. The total exposure projected for the first canister was 0.703 person-rem and the actual was 0.581 person-rem. This was consistent with an industry range of 0.300 to 0.700 person-rem for first loadings (Attachment 2, Radiation Protection, Pages 33-34).
- Criticality prevention and monitoring during cask loading was implemented. The minimum spent fuel pool boron concentration required by Technical Specifications was established. Criticality monitoring and alarm systems were installed in all areas where spent fuel was handled (Attachment 2, Radiation Protection, Pages 35-36).
- The licensee had performed an analysis to confirm that the limits of 10 CFR 72.104 would not be exceeded during normal operation of the ISFSI when fully loaded. The Horizontal Storage Module (HSM) dose rates had been established based on the analysis (Attachment 2, Radiation Protection, Page 37).

Records

- The licensee had established measures to ensure the 10 CFR 72.212 Report, Certificate of Compliance, and related documents were maintained for as long as spent fuel was stored at the ISFSI (Attachment 2, Records, Page 38).
- The licensee had made the required 90 day notification to the NRC prior to loading their first cask, and had established procedural requirements to register each cask with the NRC within 30 days after loading (Attachment 2, Records, Pages 38-39).
- The licensee had established records for Special Nuclear Material (SNM) accountability. The records were complete and included transfer of spent fuel to the ISFSI (Attachment 2, Records, Page 39).

Special Lifting Devices

- The licensee had ensured that all special lifting devices were subjected to initial load testing and were incorporated into the Surry Power Station 10-year In-Service Inspection (ISI) program for continuing compliance (Attachment 2, Special Lifting Devices, Pages 39-41).
- The licensee had established procedures to ensure that all special lifting devices were inspected prior to use and had established programs to ensure that all major maintenance or alterations were followed by a repeat of the initial load testing (Attachment 2, Special Lifting Devices, Pages 41-42).

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Training

- The NUHOMS-HD vendor (AREVA) provided training to the Surry Power Station ISFSI personnel. The licensee had reviewed and accepted the vendor training under the Surry Power Station 10 CFR Part 50 Training Program. Only those personnel who had completed all phases of the training were certified to operate the ISFSI equipment and systems (Attachment 2, Training, Pages 43-44).
- The training had been conducted in the classroom and in the field. The classroom training used the training modules that were developed in conformance with the NUHOMS FSAR requirements. The field training had been conducted during the dry run training exercise (pre-operational testing). The tasks that were taught during the dry run were consistent with the conditions of the Certificate of Compliance. All ISFSI personnel had completed the training (Attachment 2, Training, Pages 45-46).

Welding

• Hydrogen monitoring was implemented during welding of the first NUHOMS-HD canister. The canister unloading procedure required hydrogen monitoring during lid cutting. (Attachment 2, Welding and Weld Testing, Page 48).

Supplemental Information

PARTIAL LIST OF PERSONS CONTACTED

Licensee Personnel

D. Anderson - Health Physicist

- L. Baker Supervisor, Nuclear Shift Operations
- A. Barbee Manager, Training

W. Belcher - Nuclear Security Shift Supervisor

T. Brookmire - Supervisor, Nuclear Engineering

J. Costello - Supervisor, Emergency Preparedness

J. Curry - Supervisor, Materials Verification

R. Dillard, Jr. - Fire Protection Engineering Programs - Appendix R

A. Ewell - Supervisor, Fuel Handling

M. Fanguy - Lead Reactor Engineer

- W. Ford Senior Instructor
- B. Garber Supervisor, Licensing
- J. Grau Manager, Nuclear Oversight
- F. Grover Manager, Operations
- D. Jernigan Site Vice President
- R. Johnson Supervisor, Operations Support
- L. Jones Manager, Radiation Protection and Chemistry
- J. Keithley Supervisor, Health Physics Technician Services
- J. Knapp Nuclear Specialist
- J. Kubovcik Unit Supervisor
- M. Laidlow Fuel Accountability and Inspection Specialist
- A. LeClerc Supervisor, Materials Verification
- J. Lyons Control Room Operator
- T. Nieme, Nuclear Engineer III, Licensing
- T. Ragland Supervisor, Health Physics Operations
- C. Redman Supervisor, Records
- R. Robins Engineer, Nuclear Fuels
- K. Robinson Mechanic
- L. Rollings Station ALARA Coordinator
- R. Savedge, Emergency Preparedness Specialists-Offsite Coordinator
- L. Hilbert-Semmes Corrective Action Program Manager
- R. Simmons Acting Plant Manager
- K. Sloane Plant Manager
- B. Stanley Acting Plant Manager
- J. Sukosky Health Physicist II
- B. Taylor Senior Instructor
- B. Wakeman Engineer III, Corporate Nuclear Analysis and Fuels
- D. Williams Supervisor, Nuclear Site Safety
- J. Wright Health Physics Shift Supervisor
- A. Xenakis Control Room Operator
- C. Zalesiak, Engineer III, Corporate Civil Engineering
- R. Szczypinski, Jr. Mechanic

Contractor Personnel

- J. Boshoven Senior Project Manager, Transnuclear
- B. Cheek Health Physics Technician
- W. Rodgers Project Engineer, Transnuclear
- B. Speckline Supervisor, Fuel Handling North Anna

INSPECTION PROCEDURES USED

- 60854.1 Pre-operational Testing of Independent Spent Fuel Storage Installations at Operating Plants
- 60855.1 Operation of an Independent Spent Fuel Storage Installation at Operating Plants
- 60856.1 Review of 10 CFR 72.212(b) Evaluations at Operating Plants

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

None.

Discussed

None.

LIST OF ACRONYMS USED

ALARA ANSI	As Low As Reasonably Achievable American National Standards Institute
ASME	American Society of Mechanical Engineers
BPRA	Burnable Poison Rod Assembly
CoC	Certificate of Compliance
dpm	Disintegrations Per Minute
DBE	Design Basis Earthquake
EAB	Exclusion Area Boundary
EAL	Emergency Action Level
EPIP	Emergency Plan Implementing Procedure
GWD/MTU	Gigawatt Days per Metric Ton Uranium
HSM	Horizontal Storage Module
ISFSI	Independent Spent Fuel Storage Installation
ISI	In-Service Inspection
JPM	Job Performance Measure
kW	Kilowatt
LLWSF	Low Level Waste Storage Facility

M&TE MBR msl NCR NFAH NRC ppm psf PT RCC ref-cc/sec RWP SAT SER SAT SER SNM SSC SSE SSI TEDE TER TPA UFSAR	Measuring and Test Equipment Material Balance Report Mean Sea Level Non-Conformance Report Non Fuel Assembly Hardware Nuclear Regulatory Commission Parts Per Million Pounds Per Square Foot Liquid Penetrant Testing Rod Control Cluster Reference Cubic Centimeters Per Second Radiation Work Permit Systematic Approach to Training Safety Evaluation Report Special Nuclear material Structures, Systems, and Components Safe Shutdown Earthquake Soil Structure Interaction Total Effective Dose Equivalent Technical Evaluation Report Thimble Plug Assembly Updated Final Safety Analysis Report
	o ,
VPI	Vibration Suppression Insert
wt. %	Weight Percent