



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

1989 LETTER
AMEND #128 APPROVAL

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 128 TO FACILITY OPERATING LICENSE NO. DPR-32
AND AMENDMENT NO. 128 TO FACILITY OPERATING LICENSE NO. DPR-37
VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-280 AND 50-281

1.0 INTRODUCTION

By letter dated February 14, 1979, as supplemented September 21, 1982, August 30, 1985, April 11, 1988 and May 12, 1989, the Virginia Electric and Power Company (the licensee) requested amendments to Facility Operating License Nos. DPR-32 and DPR-37, issued to the licensee for operation of the Surry Nuclear Power Station, Units 1 and 2 (SPS-1&2), respectively.

Two previous amendments have been granted to SPS-1&2 by the Commission which were similar to those evaluated herein. They were Amendment Nos. 110 and 110 dated November 21, 1986, which deleted the inservice inspection requirement for the reactor vessel closure head cladding, and Amendment Nos. 114 and 114 dated November 17, 1987, which replaced a requirement to perform a partial closure test of the main steam line trip valves with a requirement to perform a full closure test. Both were originally included in the request for the change evaluated here but were subsequently evaluated separately in order to expedite their approval.

The proposed amendment removes obsolete inservice inspection and testing requirements that were incorporated in the SPS-1&2 Technical Specifications (TS) when the units were originally licensed, and replaces them with more up-to-date NRC-approved requirements specified in 10 CFR 50.55a(g). Since 10 CFR 50.55a(g) was already considered applicable to all nuclear plant licensees, the net result of the changes to the SPS-1&2 TS is deletion of requirements no longer deemed beneficial and the elimination of confusion that may result from conflicts between the inservice inspection and testing specified by the SPS-1&2 TS and that specified in 10 CFR 50.55a(g). Elimination of such conflicts is required by 10 CFR 50.55a(g)(5)(ii).

Certain augmented inservice inspections were included in the SPS-1&2 TS because of plant-specific concerns, for example, inspections performed with regard to questionable construction welding practices. The NRC staff's evaluation examined the proposed amendment to assure that the changes did not eliminate any augmented inservice inspections.

The staff encouraged the licensee to utilize NRC Standard Technical Specification (STS) wording from NUREG-0452 in their proposed changes to facilitate NRC evaluation and provide increased uniformity with the TS of other nuclear plants.

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By letters dated April 11, 1988 and May 12, 1989, the licensee provided (1) rewording and reformatting for some TS changes for clarification and consistency with the STS, (2) updates to some TS to reflect amendments issued and regulatory changes and (3) supplemental information concerning the proposed TS changes. The staff has determined that this additional information does not substantially alter the action noticed or change the initial no significant hazards consideration determination.

2.0 DISCUSSION AND EVALUATION

The staff's evaluation of the changes to the TS is as follows:

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TS pages ii and iii have been updated to correct various titles. In addition, minor editorial changes have been made. These changes are administrative in nature and therefore the staff finds these changes acceptable.

TS 3.1.A.3.c

This change adds a note that defines pressurizer safety valve "lift setting" pressure. The definition is identical with that given in the NRC STS and is acceptable to the NRC staff.

TS 3.6, Tables 3.6-1A and 3.6-1B

Lift setting pressure requirements for main steam code safety valves were added. This is in accordance with the STS and is acceptable to the NRC staff. In addition, in Tables 3.6-1A and 3.6-1B the licensee included a footnote indicating that "as found" lift settings would be acceptable if they were within $\pm 3\%$ of the lift setting pressures specified in the table. This differs from the STS which specifies $\pm 1\%$. "As left" settings were specified to be $\pm 1\%$, which is consistent with the STS. By submittal dated May 12, 1989, the licensee provided supplemental information supporting the acceptability range of $\pm 3\%$ and concluded that the accident analyses would still meet the acceptance criteria given in the Updated Final Safety Analysis Report with the $\pm 3\%$ tolerance. Based on this submittal, the staff has determined that the $\pm 3\%$ "as found" tolerance is acceptable. The NRC staff has similarly accepted this $\pm 3\%$ tolerance for other plants (e.g., for Palisades in a November 14, 1988 evaluation).

TS 4.0

The change to this TS adds wording which specifies that inservice inspection and testing is to be performed in accordance with the revision of ASME Section XI required by 10 CFR 50.55a(g). As the change is essentially consistent with the STS and provides that the inspection and testing is to be in accordance with the NRC approved requirements, it is acceptable to the NRC staff.

TS 4.1, Table 4.1-2A, Items (4) and (5)

Test frequencies for pressurizer and main steam safety valves are changed to reference TS 4.0.3 of Section 4.0. This, by reference to 10 CFR 50.55a(g), imposes NRC-approved ASME Section XI test frequency requirements. Thus, it is acceptable to the staff.

TS 4.1, Table 4.1-3A, Items (1) through (3) and Table 4.1-3B, Items (1) through (4)

These tables give flushing requirements for certain piping. In the current TS they specify monthly flushing to be conducted along with or immediately after pump testing. The changes proposed permit pump testing and flushing to be separated. The staff finds no technical need for associating pump tests with flushing and considers the changes acceptable. The licensee instituted the changes such that monthly flushing would be retained when pump testing is switched to a quarterly frequency in accordance with ASME Section XI requirements imposed by 10 CFR 50.55a(g).

TS 4.2, Table 4.2-1, Items (1.1) through (2.2.2)

These changes replace obsolete non-plant specific inservice inspections with current NRC-approved inspection requirements. In all but one instance, the proposed changes involve providing reference to current NRC-approved ASME Section XI requirements specified through 10 CFR 50.55a(g). ~~The one exception involves reactor coolant pump flywheel inspections and, in that case, the licensee utilizes reference to a NRC Regulatory Guide, consistent with Standard Technical Specification wording. This reference is acceptable to the staff.~~

Special inservice testing requirements originally included in the TS because of concerns specific to the Surry plant are retained in the amendment without substantive alteration. The staff has determined that the changes made are acceptable.

TS 4.3

This change replaces obsolete ASME Section XI inservice inspection and test requirements with those currently approved by the NRC and referenced in 10 CFR 50.55a(g). Requirements not originally based on ASME Section XI were retained unchanged. Therefore, the staff finds the changes acceptable.

TS 4.5

This change replaces monthly inservice testing of spray system pumps and valves with the quarterly testing permitted by the NRC-approved ASME Section XI requirements specified in 10 CFR 50.55a(g). This is consistent with testing requirements in the STS, and is acceptable. Special testing not clearly associated with standard inservice testing addressed by ASME Section XI was retained in the amendment without significant alteration.

The change from monthly to quarterly testing of pumps does reduce the frequency of associated test spraying through the refueling water storage tank test spray nozzles - a test which aids in assuring that the spray fluid does not contain particles which would clog spray nozzles. This test is not ordinarily performed by licensees, as most plants do not have the capability to perform the test and rely solely on the normal Section XI pump and valve tests. A significant pump test differential pressure or reduced flow from clogging of screens (i.e., filters) is an indication of oversize particles, thus the pump test provides a test against particles that might clog spray nozzles. Therefore, the NRC approval of quarterly spray pump testing for other plants logically applies to the pump testing and test spraying at Surry, and is therefore acceptable.

TS 4.11

The only substantive changes involve replacing monthly testing of certain safety injection system pumps and valves with quarterly testing through reference to the NRC-approved ASME Section XI requirements specified in 10 CFR 50.55a(g). This is consistent with current practices accepted by the NRC, is included in the STS, and is acceptable.

4.0 SUMMARY

The NRC staff found that the changes discussed above represent removal of obsolete requirements and replacement with requirements that are technically consistent with those currently acceptable and prescribed in the STS and 10 CFR 50.55a(g). Therefore, the staff finds the proposed changes regarding the inservice testing and inspection requirements acceptable.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change in the installation or use of the facilities components located within the restricted areas as defined in 10 CFR Part 20. The staff has determined that these amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). These amendments also relate to changes in administrative requirements. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

6.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: May 24, 1989

Principal Contributor:
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TABLE 4.2-1

SECTION A. MISCELLANEOUS INSPECTIONS

Item No.	Required Examination Area	Required Examination Methods	Tentative Inspection During 10-Year Interval	Remarks
1.3	Primary Pump Flywheel	See remarks	See remarks	Examination to be conducted in accordance with regulatory position C.4.b of regulatory guide 1.14 Rev. 1, August 1975.
1.4	Low Pressure Turbine Rotor	Visual and Magnetic Particle or Dye Penetrant	100% of blades every 5 years	None

SECTION B. SENSITIZED STAINLESS STEEL

2.1.1	Circumferential and longitudinal pipe welds and branch pipe connections larger than 4 inches in diameter	Visual and Volumetric	By the end of the interval, a cumulative 75% of the circumferential welds in the piping system would have been examined, including one foot on any longitudinal weld on either side of the butt welds	A minimum of 5% of the welds will be examined every 1-2/3 years (generally each normal refueling outage). See Transcript of Hearing (pp. 303--34) and Initial Decision (p.7, p.10)
2.1.2	Circumferential and longitudinal pipe welds and branch pipe connections	Visual	By the end of the interval a cumulative 100% of the welds and pipe branch connections would be examined a minimum of three times	A minimum of 50% of the welds will be examined every 1-2/3 years (generally, each normal refueling outage). See Transcript of Hearing (pp. 303-304) and Initial Decision (p.7, p.10)

Amendment Nos. 128 and 128

TS 4.2-5