

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

January 11, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 179C
NO/WDC:jab
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

AMENDMENT TO OPERATING LICENSES DPR-32 AND DPR-37
SURRY POWER STATION UNIT NOS. 1 AND 2
SUPPLEMENT TO PROPOSED TECHNICAL SPECIFICATION CHANGE

In our letter dated May 4, 1983, (Serial No. 179) and supplemental letters dated September 23, 1983, (Serial No. 179A) and November 4, 1983, (Serial No. 179B), the Virginia Electric and Power Company requested an amendment, in the form of changes to the Technical Specifications, to Operating Licenses DPR-32 and DPR-37 for the Surry Power Station, Unit Nos. 1 and 2. The proposed change included the Radiological Effluent Technical Specifications (RETS) in the Surry Technical Specifications. A supplement to the proposed change is enclosed.

This supplement is proposed to clarify the Radiological Effluent Technical Specification and comply with the requirements of NUREG - 0472, Revision 3. The proposed Technical Specification changes are provided in Attachment 1. A discussion of the proposed changes is provided in Attachment 2.

In addition to the supplemental changes, VEPCO requests additional time to implement RETS. Since the submittal of May 4, 1983, a review of station procedures and equipment has revealed implementation difficulties which may interfere with the smooth transition between Surry's current specification and the standardized RETS.

Procedures currently under development provide a manual method to implement the RETS gaseous instantaneous effluent dose rate specification and liquid instantaneous concentration limits, prior to release of radioactive material. The procedures also provide for manual calculation and tracking of the dose or dose commitment to the maximum exposed member of the public from radioactive materials in the liquid and gaseous effluents. Due to the complex and tedious nature of the manual method, calculations are performed after the release has occurred and the release data summarized. To facilitate the complex calculations, the number of releases and the number of various release

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pathways, computerized dose calculation and dose trending are needed. Since the dose or dose commitment is the most limiting specification placed upon the effluent releases, this more desirable pre-release review and trending methodology should be implemented. Implementation of the computerized methodology will require an additional 4-6 months to develop and implement.

In addition to procedural difficulties, certain channels of the Radiological Effluent Monitoring Instrumentation could place Surry in an action mode, as specified by Table 3.7-5(a) and Table 3.7-5(b), due to current maintenance and calibration problems.

The Component Cooling Service Water Effluent Line Monitor is the originally installed equipment used to monitor gross leakage in the Component Coolant Heat Exchanger. During the past 10 years of operation, the system has experienced design problems associated with sample pump reliability. Sample pump replacement or sample line relocation may provide monitor operability but design modification may be required to provide long term reliability and increased sensitivity. Refurbishment and a re-evaluation of the system design is in process. The proposed RETS requires reporting in the Semi-annual Radioactive Effluent Report if the system is not returned to operable status within 30 days of monitor failure. Current status of the system will place Surry in this action mode.

The Waste Gas Holdup System Explosive Gas Monitors have experienced similar reliability problems. Constant recirculation through the gas monitors will be required to maintain monitor operability. The system has experienced sample recirculation problems with low tank pressure. The action mode for failure of this system places the station in a program of daily sampling of the Waste Gas Decay Tanks.

The Condenser Air Ejector System flow rate measuring device will require factory calibration. Replacement monitors, calibrated at the factory, are in the process of being purchased, to be installed in the place of devices currently installed.

In view of these problems, an implementation date of July 1, 1984, is requested. This implementation date will eliminate the need for submitting two Semi-annual Radioactive Effluent Release Reports covering the first six months of 1984. The Radioactive Effluent Release Report for the first and second quarter shall be submitted in the format specified by the current Technical Specifications and the third and fourth quarter will be submitted in the format specified by the proposed RETS. The Semi-annual Radioactive Effluent Report submitted 60 days after January 1, 1985, shall include an evaluation of the dose commitment for the entire year.

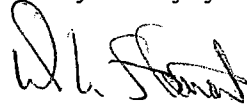
The extended date will facilitate smooth implementation of the proposed Radiological Effluent Technical Specifications and provide a sufficient period of time to eliminate the previously discussed problems.

This request has been reviewed and approved by the Surry Station Nuclear Safety and Operating Committee and the Safety Evaluation and Control Staff. It has been determined that this request does not pose a significant hazards

VIRGINIA ELECTRIC AND POWER COMPANY TO Mr. Harold R. Denton

consideration as defined in 10CFR50.92 or an unreviewed safety question as defined in 10CFR50.59.

Very truly yours,



W. L. Stewart

Attachments:

1. Proposed Technical Specification Change
2. Discussion of Proposed Technical Specification Change

cc: Mr. James P. O'Reilly
Regional Administrator
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