

April 12, 1985



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. 85-199
NO/JDH:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

VIRGINIA POWER
SURRY POWER STATION UNIT NOS. 1 AND 2
PROPOSED TECHNICAL SPECIFICATION CHANGE-SUPPLEMENT

In our letter dated October 28, 1980 (Serial No. 862), we requested several changes to the Technical Specifications for Surry Power Station Unit Nos. 1 and 2. Among the changes proposed was one pertaining to breakpoints to be incorporated in the High Energy Pipe Break Inspection Program (Technical Specification 4.15). In a subsequent letter dated September 21, 1983 (Serial No. 529), we advised you that changes had occurred in the break point information to be incorporated in the inspection program. We also informed the NRC Surry Project Manager at that time that we would be supplementing the original submittal. The supplemental information is attached.

The proposed change deletes Technical Specification 4.15 completely. In its place, acceptable inspection will be conducted under the ASME Code Section XI ISI program. A discussion of the proposed change is included as Attachment 1. The Technical Specification changes are included as Attachment 2.

This request has been reviewed and approved by the Station Nuclear Safety and Operating Committee and by the Safety Evaluation and Control Staff. It has been determined that this request involves neither an unreviewed safety question as defined in 10CFR50.59, nor a significant hazards consideration as defined in 10CFR50.92.

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Because the NRC took action on the other portions of the original amendment application, an additional Application Fee of \$150 is enclosed. If you have any questions or need additional information, please contact us immediately.

Very truly yours,


W. L. Stewart

Attachments:

1. Discussion of Proposed Technical Specification Changes
2. Proposed Technical Specification Changes
3. Application Fee

cc: Dr. J. Nelson Grace
Regional Administrator
Region II

Mr. D. J. Burke
NRC Resident Inspector
Surry Power Station

Mr. Charles Price
Department of Health
109 Governor Street
Richmond, Virginia 23219

ATTACHMENT 1

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGES

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGE

The original Technical Specification 4.15, dated September 21, 1973 was implemented for main steam and feedwater piping systems located outside containment and considered high energy flow paths. A concern had manifested over the continued integrity of piping systems not covered by Surry Technical Specification 4.2, "Reactor Coolant System Component Inspections," which is limited to the reactor coolant pressure boundary. As explained in the technical basis of T.S. 4.15, a potential exists within high energy piping for flaw growth and leakage due to cyclic loading and resultant metal fatigue. These safety implications were recognized and the technical specification was adopted.

Since the adoption of this technical specification, code requirements have expanded into areas not associated with the reactor coolant pressure boundary. As defined in Regulatory Guide 1.26, February 1976, paragraph C.1.(d), a Quality Group B classification has been assigned to the affected piping. This corresponds to Class 2 identification under the ASME Boiler and Pressure Vessel codes. The requirement of 10CFR50.55a (b)(2) to update to ASME Section XI, 1980 edition, winter 1980 addenda at the Surry units has created a duplication of inspection.

As delineated in 10CFR50.55 a(b)(2)(iv)(A) and (B), Surry used the 1974 edition, summer 1975 addenda of ASME Section XI for "the extent of examination" for category C-F, pressure retaining welds in piping. Examination requirements, examination method, acceptance standard, and frequency of examination are under the rules of the 1980 edition, winter 1980 addenda of ASME Section XI. A chart is provided (Enclosure I) comparing both Technical Specification 4.15 and the code. Although differences exist between the two, the concepts utilized to develop the present code contain the accepted risks allowed by the governing authority. Previous break points located outside the Class 2 boundary on the feedwater system are not considered critical safety points. They are not associated with containment isolation, or the auxiliary feedwater system used during emergency steam generator operation. In addition, guidelines presented in Regulatory Guide 1.26 designate these points Quality Group "D" with no corresponding ASME class. It should be noted that the examination history has revealed no reportable indications on any of the original T.S. welds during the entire first interval.

It is our contention that acceptable inspection is provided by the ASME Boiler and Pressure Vessel Code and continuation of Technical Specification 4.15 represents impractical duplication. Thus, we propose to delete Technical Specification 4.15.

The proposed change to Technical Specifications 4.15 has been reviewed and it is concluded that:

- (a) The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety and previously evaluated in the Safety Analysis Report is not increased since the system is still proven to be operational by the Inservice Inspection program.

- (b) The potential for an accident or malfunction of a different type than previously evaluated in the Safety Analysis Report is not created. The level of integrity and the function of the system is not changed by performing the inspection in accordance with Inservice Inspection Program instead of Technical Specifications 4.15.
- (c) The required margin of safety in the basis of the Technical Specifications is not reduced because the system is proven to be operable by the Inservice Inspection Program.

Therefore, no unreviewed safety question as defined in 10CFR50.59 exists.

Similarly, we have concluded that no significant hazards consideration as defined in 10CFR50.92 exists. The Commission has provided examples of proposed amendments likely to involve significant hazards considerations (48 FR 14870). Example (iii) states: "A significant relaxation in limiting conditions for operation not accompanied by compensatory changes, conditions, or actions that maintain a commensurate level of safety...". The proposed change is similar to the example in that it deletes an existing surveillance requirement. However, unlike the example, compensatory actions in the form of an equivalent ISI program will be taken, thus assuring a commensurate level of safety is maintained. Therefore, no significant hazards consideration exists.

ITEM	TECHNICAL SPECIFICATION	CODE REQUIREMENTS
1. Examination requirements	- 20 welds identified in T.S. figure 4.15	- Main steam classified ASME CLASS II as per Reg. Guide 1.26 (Includes all twelve original welds)
	- 12 welds on Main Steam System.	- Feedwater classified ASME CLASS II as per Reg. Guide 1.26 (Includes three of the eight original welds.)
	- 8 welds on Feedwater System.	
	- Welds located outside containment.	
2. Examination Method	- Volumetric examination.	- Surface examination
	- Visual inspection during normal operation	- Volumetric examination
		- VT-2 examination during a system pressure test.
		- VT-2 examination during a system hydrostatic pressure test.
3. Examination Acceptance criteria	- Volumetric exam to the requirements of subsection ISC 100 through 600 of the 1972 Winter Addenda of ASME Section XI.	- Surface, volumetric, and VT-2 examinations to the requirements of the 1980 edition, Winter 1980 addenda of ASME Section XI
	- Visual exam evaluates all leaks and allows no through-wall flaw leakage.	

4. Examination Frequency and extent of examination
- Volumetric; each 10 year interval 1/3 of the identified welds during each 1/3 of the inspection interval with cumulative 100% coverage of all welds.
 - Surface; each 10 year interval:
 - 1st period (3 1/3 yrs) 16%-34% category CF item C5.21 welds.
 - 2nd period (3 1/3 yrs) 50%-67% category CF item C5.21 welds.
 - 3rd period (3 1/3 yrs) 100% category CF item C5.21 welds.
 - (Note: 4th interval requires 100% completion by second period.)
 - Visual; weekly walkdowns at all weld locations.
 - Volumetric; same as surface.
 - VT-2 system pressure test; each period (3 1/3 yrs for every interval (10 yrs).
 - VT-2 system hydrostatic pressure test; once every interval (10 yrs).
 - Volumetric and surface requires completion of 100% of one multiple stream per interval. (IWC-2411 74-S75), additional examinations as required by IWC 2430 for failures.

5. Repairs, post- - In accordance with the
repair examina- rules of ASME Section
tions and pressure XI code.
- Station's repair/
replacement program
based upon ASME
Section XI 1980
edition, winter
1980 addenda.

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATIONS CHANGES