

June 20, 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. 85-340
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
AUGMENTED INSERVICE INSPECTION PROGRAM

During followup reviews to support a proposed Technical Specification change (Virginia Power letter, dated September 21, 1982, Serial No. 544) on the inservice inspection program--currently being reviewed by the NRC--we identified several discrepancies in the current Technical Specifications with guidance given in the Atomic Safety and Licensing Board's Initial Decision,* dated April 26, 1972. In its findings, the Board reaffirmed Virginia Power's commitment to conduct an augmented inservice inspection program for welds in sensitized stainless steel piping.

Complementing the augmented inservice inspection program, the Board concluded that additional reporting and recordkeeping requirements should also be put into effect. The Board directed the NRC staff to include these requirements in the Surry Technical Specifications: a) notify the Commission at least sixty days before scheduled refuelings and include details of the proposed inservice inspection planned for the period; b) maintain (on file at the facility) primary records of inservice inspections; and, c) the report submitted to the Commission ninety days after completing the inspection should be a detailed report, and that the detailed report be preceded by a preliminary report prior to restart. The staff incorporated the augmented inspection program in Section 4.2 of the Surry Technical Specifications, the recordkeeping requirements in Section 6.5, and the reporting requirements in Section 6.6. The Surry Technical Specifications were issued May 25, 1972.

* The Board's Initial Decision was on the issue of disputed welds and welding practices at Surry Unit 1. The initial decision constituted the final action of the Commission on June 8, 1972.

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In 1976, the reporting requirements were substantially revised in response to an NRC request to conform with Regulatory Guide 1.16, "Reporting of Operating Information - Appendix A Technical Specifications," Revision 4. Amendment No. 14 to the Surry Technical Specifications, issued January 7, 1976, revised the Section 6.6 reporting requirements. At that time, the Board requirements which were included in the section were inadvertently deleted. Since that time, Virginia Power has continued to meet the reporting requirements specified in the ASME Code for the inservice inspection program. However, compliance with the augmented inspection and recordkeeping requirements has continued uninterrupted since only the Board requirements in Section 6.6 of the technical specifications were removed.

On April 22, 1985, we notified the NRC Surry Project Manager of this matter. We discussed the potential impact and explored possible alternatives for resolving the issue. We concluded that, based on experience, it appeared that the Board's original concerns had never materialized. In the thirteen years since Surry 1 began operation (and twelve years for Surry 2), no concerns regarding the welds had arisen in the course of the augmented inspection program (the augmented program had tripled the inspection frequency of the welds on sensitized steel piping.)

The inadvertent deletion of the reporting requirements and the results of the augmented inspection program were also discussed with the cognizant NRC Region II inspector, Mr. E. Girard, on April 24, 1985. At that time, we informed him that we intended to write a letter informing the NRC of our findings and to propose our action plan to resolve the issue.

Based on the failure to identify any concerns associated with the welds in the reactor coolant system pressure boundary (the Board's area of concern) over the past 12-13 years as a result of the augmented inservice inspection program, we believe that no need exists to continue the augmented program. Therefore, we propose to submit a license amendment to: restore the inspection program for the welds (Surry Tech. Spec. Table 4.2-1, Section H, Sensitized Stainless Steel) to the frequency required by the Code; modify the recordkeeping requirements to those consistent with the Standard Technical Specifications, and maintain the reporting requirements for the inservice inspection program in accordance with the ASME Code.



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It is our intent to submit the proposed license amendment in the near future. If you have any questions or require additional information, please contact us immediately.

Very truly yours,

W. L. Stewart

cc: Dr. J. Nelson Grace
Regional Administrator

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