



July 3, 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. 85-426  
NO/HLM:dn  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

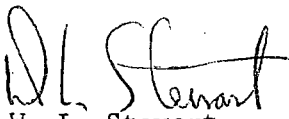
Gentlemen:

VIRGINIA POWER  
SURRY POWER STATION, UNITS 1 AND 2  
INSERVICE INSPECTION TECHNICAL SPECIFICATION CHANGE REQUEST

Your letter of May 28, 1985 requested we submit additional information related to our proposed Technical Specifications for Inservice Inspection originally submitted to you on September 21, 1982 (Serial No. 544).

Responses to your specific questions are provided in the attachment. As a result of reviewing your questions and our earlier submittal, we plan to provide you with an updated proposal. The attached responses should enable your review to progress while we prepare this update. It is our current plan to submit the updated proposal by August 30, 1985.

Very truly yours,

  
W. L. Stewart

Attachment

AO 47  
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8507090300 850703  
PDR ADOCK 05000280  
Q PDR

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

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

Mr. J. D. Neighbors  
NRC Surry Project Manager

ANSWERS TO ADDITIONAL INFORMATION REQUESTED  
PROPOSED TECHNICAL SPECIFICATION CHANGES  
SURRY UNITS 1 and 2

1. Provide a detailed description giving the reasons and justifications for your proposed changes. This could be similar to the "Description of Changes" provided with your February 14, 1979, request for Technical Specification (TS) changes.

Response

The revised TS change request will provide a detailed "Description of Changes".

2. With regard to your proposed wording for TSs 4.0.2 and 4.0.3, we encourage you to use instead the wording indicated in 4.0.2 and 4.0.5 of the Standard Technical Specifications (STSs) for Westinghouse Pressurized Water Reactors (NUREG-0452, Revision 4). Please indicate whether you have any objection to this STS wording as a modification to your proposed changes.

Response

The revised TS change request will use portions of Standard Technical Specification (STS) wordings in TS 4.02 and TS 4.03 (STS 4.0.2 and 4.0.5). Differences will be minor or will be clarifications with regard to our code edition.

3. With regard to the bases you propose for TS 4.0, please indicate whether you have any objection to substituting, as a modification to your proposed changes, the wording of STS Bases 4.0.2 and 4.0.5.

Response

The revised TS change request will use portions of STS wording in the bases. Differences will be minor or will be clarifications with regard to our code edition.

4. For TS Table 4.1-2A, item 13, explain what effect the proposed changes will have on test frequency and type of stroking requirements (i.e., full versus partial stroking).

Response

The revised TS change request will eliminate the partial stroke in this section, substituting the more conservative full stroke test.

5. Verify that you will continue to maintain as permanent records the past Inservice Inspection (ISI) data that were generated in complying with TS Table 4.1-2.

Response

The revised TS change request will leave the requirement for recordskeeping.

6. Provide detailed justification for your deletion of most of TS Table 4.2-1, Section G, Miscellaneous Inspections.

Response

The revised TS change request will continue materials irradiation surveillance and low pressure turbine inspection as previously required. The Low Head SIS piping located in the valve pit is included in the ASME XI system pressure test program. This will require visual examination under pressure on a period and interval basis. This is usually accomplished by sealing the open ended pipe and performing the Appendix J, Type C air pressurization followed by visual examination. Additionally the examination requirements of TS table 4.11-1 remain unchanged, so elimination of this section G requirement removes unnecessary duplication.

7. Indicate whether the changes that you propose in pump test frequency require changes to your flushing requirements referred to in TS Table 4.1-3.

Response

The revised TS change request will reword flushing requirements to accommodate the new pump testing frequency. Flushing would still be conducted at the previous frequency, but not necessarily in conjunction with a pump test.

8. Provide detailed justification for your deletion of the special inspections of sensitized stainless steel piping in TS Table 4.2-1, Section G, Miscellaneous Inspections.

Response

The revised TS change request will include return of the special inspections of sensitized stainless steel piping. However, rewording will be necessary due to the elimination of referenced sections in the old TS.

9. Explain the significance of the changes you propose in the pump flywheel inspection requirements.

Response

Endorsement of regulatory position C.4.B of Reg. Guide 1.14 Rev. 1, August 1975, eliminates the visual examination requirements previously required. It maintains the ultrasonic examination requirements previously stated and adds a complete surface examination of all exposed surfaces at the end of each 10 year

interval. It also adds a requirement for NRC notification when an increase in flaw size or growth exceeds that predicted for the service life.

10. With regard to your proposed changes to TS 4.3, explain and justify in detail, your deletion of the reactor coolant system leakage test in TS 4.3.0. Include an explanation of why this test was originally included in the TSs.

Response

Specification 4.0.3 reference of Section XI of the ASME Boiler and Pressure Vessel Code provides the requirements to continue system pressure tests. These requirements are more inclusive, incorporating Class 2 and Class 3 system pressure tests. Maintaining section 4.3 as currently written in TS would be unnecessary duplication and therefore it was changed. The original W70 ASME XI requirements for hydrostatic testing are in paragraph IS-522, where the following formula is found:

$$P_t = P_o \left( \frac{S_y}{S_y} \right)$$

where

$P_t$  = system hydrostatic test pressure, psig.

$P_o$  = system nominal operating pressure at rated reactor power, psig.

$S_{yt}$  = yield strength at test temperature, (as specified in the applicable component construction code) for the pressure-containing material of the component.

$S_{yo}$  = yield strength at temperature corresponding to operating pressure (as specified in the applicable component construction code) for the pressure-containing material of the component.

T.S. 4.3 provided the required pressures without having to use this calculation. The new ASME XI, IWA 5000, IWB 5000, provides much clearer guidance on test pressure than the earlier code.

11. Provide a revised TS index identifying your proposed changes.

Response

The revised TS change will include an index change.

12. Check your submittal to assure that TS changes you proposed are still appropriate. You may wish to modify the September 21, 1982, submittal in order to incorporate corrections that were proposed and accepted subsequent to the submittal. For example, compare

your proposed TS Table 4.1-2A, Item 1 requirements, with the current requirements.

Response

The earlier submittal has been reviewed and is in the process of being updated as indicated above.