

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

August 30, 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. 85-589
NO/JDH:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT NOS. 1 AND 2
SUPPLEMENT TO
PROPOSED TECHNICAL SPECIFICATION CHANGES

In our letter dated November 2, 1984 (Serial No. 577), we submitted a request for an amendment, in the form of changes to the Technical Specifications, to Operating License Nos. DPR-32 and DPR-37 for Surry Power Station Unit Nos. 1 and 2. The proposed changes were to the administrative portion of the Technical Specifications (Section 6) and reflected a reorganization of the Nuclear Operations Department. On April 17, 1985 (Serial No. 577A), we supplemented the proposal to address a change in the Health Physics organization at Surry. As a result of several subsequent discussions with the NRC Surry Project Manager and technical reviewers, we are again supplementing the proposed change. A discussion of these additional changes is provided in Attachment 1.

In roughly the same time frame, we had also proposed and supplemented changes to the Technical Specifications to reflect the new Licensee Event Report System. These proposed changes were submitted on November 30, 1984 (Serial No. 198) and supplemented on April 12, 1985 (Serial No. 198A). Many of the pages affected by this revision were also affected by the reorganization changes.

In order to simplify the processing and issuance of the requested changes, we have consolidated all five submittals (i.e., the November 2 and 30, 1984 requests, the April 12 and 17, 1985 requests, and this request) into one package. The consolidated pages incorporating all five requests are included as Attachment 2.

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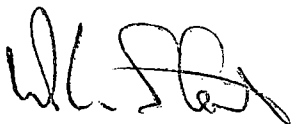
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This submittal does not alter the conclusions, safety review, or significant hazards determination of the previous requests. The submittal has been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Safety Evaluation and Control Staff.

Since this information supplements our previous submittal, which included the appropriate application fee, no additional application fee is included.

If you have any questions, or need additional information, please contact us immediately.

Very truly yours,



W. L. Stewart

Attachments

1. Discussion of Proposed Changes
2. Consolidated Set of Proposed Technical Specification Changes

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

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

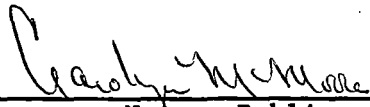
Mr. Charles Price
Department of Health
109 Governor Street
Richmond, Virginia 23219

COMMONWEALTH OF VIRGINIA)
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CITY OF RICHMOND)

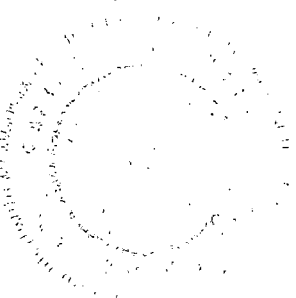
The foregoing document was acknowledged before me, in and for the City and Commonwealth aforesaid, today by W. L. Stewart who is Vice President - Nuclear Operations, of Virginia Power. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 30th day of August, 19 85.

My Commission expires: February 10, 19 89.



Notary Public



(SEAL)

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ATTACHMENT 1

DISCUSSION OF PROPOSED CHANGES

DISCUSSION OF PROPOSED CHANGES

On November 2, 1984, we submitted a proposed TS change on reorganization. We supplemented the change on April 17, 1985. As a result of several discussions with the NRC Surry Project Manager and technical reviewers, we are again supplementing the proposed change as follows:

Section 6.1.B.1 and 6.1.B.3. In our November 2, 1984 submittal, we proposed to revise the minimum qualifications standard referenced in the TS from ANSI N.18.1-1971 to ANS 3.1 (12/79 Draft). This change was proposed to make the TS consistent with the current QA topical report, VEP-1 (Revision 4), approved by the NRC, which references ANS 3.1.

We subsequently noted that the originally proposed wording in section 6.1 implied that we intended to meet ANS 3.1, without exception. That is not correct. Exceptions to the standard are identified in VEP-1 and we propose to add a footnote for clarification. The footnote states: "Exceptions to this requirement are specified in VEPCO's QA Topical Report, VEP-1, Quality Assurance Program, Operations Phase."

Section 6.1.C.1.g. In our November 2, 1984 submittal, we proposed that SNSOC provide written approval of 1) procedures and procedure changes; 2) all proposed test and experiments, and 3) all proposed changes or modifications to plant systems or equipment. We are clarifying this change to identify the responsible individual, an Assistant Station Manager, who will certify all SNSOC approvals in writing. The additional sentence states: "SNSOC approval shall be certified in writing by an Assistant Station Manager."

Section 6.6 The current specification identifies the Director of the appropriate IE Regional Office as the recipient of several reports. The proposed changes revises the TS to reflect the current NRC organization, i.e., Regional Administrator of an NRC regional office.

Section 6.6.3.f. This specification requires that we submit a special summary technical report on the initial containment structural tests. These reports were submitted on August 18, 1972 (Surry 1) and May 11, 1973 (Surry 2). The specification is a one-time requirement that has been met. We propose that Section 6.6.3.f. be deleted.

These changes supplement and clarify the proposed Technical Specification changes submitted to the NRC on November 2, 1984 and April 17, 1985. These changes do not alter the conclusions, 50.59 reviews, or no significant hazards consideration determinations of the previous submittals.