



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 104 TO FACILITY OPERATING LICENSE NO. DPR-32
AND AMENDMENT NO. 104 TO FACILITY OPERATING LICENSE NO. DPR-37

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-280 AND 50-281

Introduction

By letters dated March 16, 1982, as supplemented June 28, August 3 and August 9, 1982; June 30 and October 27, 1983; March 22 and November 2, 1984; and April 17 and August 30, 1985, the Virginia Electric and Power Company (the licensee) requested an amendment to Operating Licenses DPR-32 and DPR-37 for Surry Power Station, Unit Nos. 1 and 2, respectively, relating to onsite and offsite organizational changes.

By letter dated November 30, 1984, as supplemented April 12 and August 30, 1985, the licensee, in response to Generic Letter (GL) 83-43, proposed changes to the Surry Power Station Technical Specifications (TS) with respect to notification requirements for operating nuclear power reactors and the licensee event report system. GL 83-43 dated December 19, 1983 informed utilities of changes to Title 10 of the Code of Federal Regulations (10 CFR) with respect to notification requirements for operating nuclear power reactors and requested utilities to revise Technical Specifications to incorporate these changes. These changes involved revision to 10 CFR 50.72 for immediate notification requirements and addition of 10 CFR 50.73 for a revised licensee event report system. Both of these changes became effective January 1, 1984. GL 83-43 provided a model Technical Specification showing the revisions which should be made in the "Administrative Control" and "Definitions" sections to incorporate these regulation changes.

Discussion and Evaluation

A. Management Organization Changes

By letters dated March 16, June 28, August 3 and August 9, 1982; June 30 and October 27, 1983; March 22 and November 2, 1984; and April 17 and August 30, 1985, the licensee requested a series of Technical Specification changes associated primarily with the offsite and onsite organizations. The November 2, 1984, letter also proposes to (1) modify certain procedure review requirements and (2) change an ANSI standard reference to make the reference agree with the standard specified in the licensee's Quality Assurance Topical Report.

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1. Proposed Reorganization of Nuclear Operations Department (1982)

A reorganization within the Nuclear Operations Department will result in the transfer of responsibilities from the Manager-Nuclear Operations and Maintenance (a position that was subsequently deleted by a reorganization in 1983) to the Vice President-Nuclear Operations. The corporate organizational structure specified in the Technical Specifications previously indicated that the Nuclear Station Manager reported to the Manager-Nuclear Operations and Maintenance, who in turn reported to the Vice President-Nuclear Operations. As a result of the reorganization, the Station Managers will report directly to the Vice President-Nuclear Operations. The Vice President-Nuclear Operations will be responsible for coordinating the technical services activities and the operations/maintenance activities of the nuclear units. The transfer of responsibilities to the Vice President-Nuclear Operations will provide continued assurance of adequate management involvement and enhances management attention to safety activities for the units.

2. Proposed Reorganization of the Quality Assurance Department (1982)

A reorganization within the Quality Assurance Department will result in the Manager, Quality Assurance at the station reporting directly to the Executive Manager, Quality Assurance. The position of Director-Emergency Planning will be created within the Nuclear Operations Department. The changes will be to enhance the quality assurance and emergency preparedness programs of the company.

3. Proposed Reorganization of the Nuclear Operations Department (1983)

A reorganization within the Nuclear Operations Department (NOD) will eliminate the position of Manager, Nuclear Operations and Maintenance. The Technical Analysis and Control group will be disbanded and its functions assumed within the Safety Evaluation and Control staff, NOD, and within the Engineering and Construction Division. The Manager, Nuclear Technical Services will be retitled Manager, Nuclear Operations Support and will assume the responsibilities of the Manager, Nuclear Operations and Maintenance. The new Fuel Operations group will also report to him.

Several other title and reporting changes will take place: The title of Executive Vice President will be changed to Executive Vice President and Chief Operating Officer. The Director, Administrative Services will be realigned to report directly to the Vice President-Nuclear Operations. (This was subsequently changed by a 1984 reorganization wherein the Director, Administrative Services was realigned to report to the Manager, Nuclear Operations Support.)

A reorganization within the Security Department will also take place. Although the Station Security Supervisor will continue to have communications with the Supervisor, Administrative Services at the

station, he will report to the Corporate Director, Nuclear Security.

4. Proposed Reorganization of Training Activities (1983)

A reorganization within the Nuclear Operations Department and the Performance Services Department will aid the quality of training activities at the power stations. Although the Superintendent, Nuclear Training will continue to have communications with the Station Manager, he will report to the Director, Nuclear Training in the Maintenance and Performance Services Department. The Director, Nuclear Training will report to the Manager, Power Training Services, who in turn, will report to the Manager, Maintenance and Performance Services, who ultimately will report to the Senior Vice President-Power Operations. The consolidation of training activities will assure that effective and efficient technical training is provided to Nuclear Operations personnel.

5. Proposed Administrative Change in Onsite Organization (1984)

Trends within the utility "loss-prevention/fire-protection" field indicate the continued importance of property protection and the individuals charged with property protection. As a result, the title "Fire Marshall" will be changed to "Loss Prevention Supervisor." The new title implies a stronger business/professional role and more appropriately reflects the incumbent's rank and responsibility.

6. Proposed Reorganization of the Nuclear Operations Department (1984)

A reorganization within the Nuclear Operations Department will create two new management level positions: "Manager-Nuclear Programs and Licensing" and "Assistant Station Manager (Nuclear Safety and Licensing)." The Manager-Nuclear Programs and Licensing will assume certain authorities and responsibilities previously held by the Manager-Nuclear Operations Support in the areas of emergency preparedness, licensing, and independent safety reviews. The new Assistant Station Manager (Nuclear Safety and Licensing) will assume certain authorities and responsibilities previously held by both the Station Manager and the Assistant Station Manager (Operations and Maintenance) regarding the operation of the Station Nuclear Safety and Operating Committee (SNSOC), licensing, safety engineering, and emergency planning. The change will not create any new authorities or responsibilities within the Nuclear Operations Department; rather, by reducing the span of control of the affected managers (both new and existing), management control and effectiveness in the areas of concern will be enhanced. Thus, more management attention will be focused on significant issues.

The authority of the new Manager-Nuclear Programs and Licensing will be identified; and will be is designated to receive records of Safety Evaluation and Control activities and Quality Assurance audits.

The new Assistant Station Manager (Nuclear Safety and Licensing) will be designated as Chairman, Station Nuclear Safety and Operating Committee, replacing the Station Manager. The existing Assistant Station Manager will be redesignated as Assistant Station Manager (Operations and Maintenance).

The responsibilities and authorities of the SNSOC will be clarified. The proposed changes will allow the SNSOC to recommend Technical Specification changes to the Station Manager instead of just reviewing proposed changes. Also, the Chairman SNSOC reviews and approves recommended changes to the Plant Security Plan and implementing procedures and Emergency Plan and implementing procedures; under the new (proposed) arrangement, the SNSOC would review changes to the Plant Security Plan (and implementing procedures) and Emergency Plan (and implementing procedures) and submit recommended changes to the Station Manager.

7. Industry Standard on Qualifications and Training

The proposed change in the referenced standard on facility staff qualifications and training in Technical Specification Section 6.1 reflects the ANS standard specified in Vepco's QA Topical Report, "Quality Assurance Program Operations Phase," Amendment 4, and reflects Vepco's position on NRC Regulatory Guide 1.8-"Personnel Qualifications and Training." The QA Topical Report was approved by the NRC on October 6, 1982. Thus, the change would amend the Technical Specifications to make them consistent with the NRC-approved Topical Report. The specific change replaces ANSI N18.1-1971 with ANSI/ANS 3.1-(Draft 12/79). ANS 3.1-(Draft 12/79) meets or exceeds the requirements of the older ANSI N18.1-1971 and is acceptable to the staff.

8. Proposed Administrative Change in Onsite Organization (1985)

Trends within the utility "Health Physics" area indicate the continued importance of health and radiation protection and the individuals charged with these responsibilities. As a result, the title "Supervisor - Health Physics" will be changed to "Superintendent - Health Physics." The new title implies a stronger managerial and professional role and more appropriately reflects the incumbents rank and responsibility.

We have reviewed the proposed changes and find them acceptable as they meet the acceptance criteria of Sections 13.1.1, 13.1.2, and 13.4 of NUREG-0800, the Standard Review Plan. Technical Specification Figures 6.1-1 and 6.1-2, as revised, show the reorganized offsite and onsite management organizations.

B. Reporting Requirements to Conform to 10 CFR 50.72 and 50.73

Generic Letter No. 83-43 requested all licensees to revise their Technical Specifications to comply with 10 CFR 50.72 and 50.73. 10 CFR 50.72 has been revised to indicate the immediate notification

requirements for operating nuclear power reactors. 10 CFR 50.73 is new and provides for a revised Licensee Event Report (LER) System. To comply with the new rules, the following changes to the Surry 1 and 2 Technical Specifications have been requested by letters dated November 30, 1984, and April 12 and August 30, 1985:

1. Throughout the Technical Specifications, revise the term "Reportable Occurrence" to "Reportable Events."
2. Change the definition of "Reportable Event" to read, "a Reportable Event shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50."
3. Delete the "Reportable Occurrences" section, Technical Specifications 6.6.2, 6.6.2.a, and 6.6.2.b, and revise the references to this section throughout the Technical Specifications to reflect the renumbering of Section 6 Specifications.
4. Insert where applicable, the reference to Section 50.73 to 10 CFR Part 50.
5. Renumber Technical Specification 6.6.a to follow the outline format of the other sections of the Surry Technical Specifications.
6. Throughout the Technical Specifications revise the references to Technical Specification 6.6.
7. Revise the NRC recipient of certain reports to reflect the current NRC organization, i.e., Regional Administrator of an NRC Regional Office.
8. Delete Technical Specification Section 6.6.3.f regarding the submittal of the initial containment structural test special summary report.
9. Correction of minor editorial, format and typographical errors.

We have reviewed the proposed changes and find them acceptable as they are consistent with the guidance and intent of GL 83-43.

Environmental Consideration

These amendments involve changes in reporting and administrative procedures and requirements. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR Sec 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: December 11, 1985

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