

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

December 20, 1985

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attn: Mr. Lester S. Rubenstein, Director  
PWR Project Directorate #2  
Division of PWR Licensing-A  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Serial No. 85-751A  
NO/ETS/vlh  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Gentlemen:

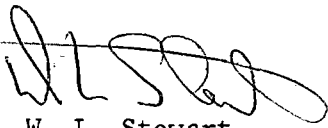
VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNIT NOS. 1 AND 2  
TECHNICAL SPECIFICATION CHANGE REQUEST

In our letter of November 19, 1985, Serial No. 85-751, we committed to provide a response to your request for additional information and a revised Technical Specification proposal that removes the snubber tables from the Technical Specifications, in accordance with Generic Letter 84-13, dated May 3, 1984.

Since this request supercedes our previous submittal which included the appropriate application fee, no additional application fee is included herein.

Should you have any questions concerning this matter, please do not hesitate to call.

Very truly yours,



W. L. Stewart

Attachments:

1. Proposed Amendment for DPR-32 and DPR-37
2. Safety Evaluation
3. Response to NRC Request for Additional Information

ADD: PWR - A/BC's TECH SUPPORT

AD - J. Knight (ltr only)  
EB (BALLARD)  
EICSB (ROSA)  
PSB (GAMMILL)  
RSB (BERLINGER)  
FOB (BENAROYA)

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PDR ADDCK 05000280  
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cc: Dr. J. Nelson Grace  
Regional Administrator  
NRC Region II

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

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

Mr. Terence L. Chan  
NRC Surry Project Manager  
PWR Project Directorate #2  
Division of PWR Licensing-A

ATTACHMENT 1

Response to NRC Questions dated October 11, 1985  
as applicable to revised T.S. change proposal

NRC Question

1. Applicability Section of Proposed Technical Specifications (TS) 3.20 and 4.17

Provide clarification to indicate whether the only snubbers which can be excluded from the TS requirements are those installed on non-safety related systems and then only if their failure or the failure of the system on which they are installed would have no adverse affect on any safety-related system.

Response

1. The proposed specification has been revised to include the statement, "Snubbers excluded from this inspection program are those installed on non-safety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effects on any safety-related systems."

NRC Question

2. Contrary to requirements of Section 3.7.9 of the Standard Technical Specification attached to Generic Letter 84-13, snubbers on systems required to be operable during cold shutdown and refueling are not required (according to proposed TS 3.20.A) to be operable during these conditions. Provide a justification.

Response

2. The proposed change to TS 3.20.A is to delete the phrase "listed in Technical Specification 4.17" which currently states: "During all modes of operation except Cold Shutdown and Refueling, all safety-related snubbers listed in Technical Specification 4.17 shall be operable except as noted in 3.20.B and 3.20.C below." The change was solely to the listing of snubbers in a table which we propose to remove as recommended by Generic Letter 84-13. The portion of the specification which the question appears to address is unchanged from the existing specification.

NRC Question

3. Proposed TS Section 4.17.A - Inspection Groups

The criteria to be used for subdividing accessible and inaccessible snubber groups into subgroups needs to be specified. Since the ASME Standard, O&M-4, has not yet been published, and since this document has not yet been approved and accepted by NRC, the TS must specify definite criteria used to select the subgroups. The criteria selected should be justified based on past testing and inspection results and the manufacturer's recommendation.

Response

3. Not applicable to this submittal because "subgrouping" was not addressed in this request.

NRC Question

4. Proposed TS Section 4.17.D.6

Functional testing of an additional 10% of the snubbers in the subgroup for each snubber failure within the subgroup does not meet the requirements of O&M-4 or the Standard Technical Specifications.

The draft of O&M-4 specifies that for each snubber that does not meet the functional test acceptance criteria, an additional sample of at least 1/2 the size of the initial sample lot shall be selected for functional testing. Section 4.7.9.C of the Standard Technical Specifications requires that an additional 10% of the snubbers be functionally tested for each functional test failure.

This paragraph needs to be revised to discuss how the requirements of Section 4.7.9.C of the Standard Technical Specifications or O&M-4 will be met.

Response

4. Not applicable to this submittal because subgroups and testing sample size were not addressed in this request.

NRC Question

5. Proposed TS Sections 4.17.E.1.a and 4.17.F.1.b

The word "Activity" appears to have been incorrectly used in the place of "Activation." Please revise if appropriate.

Response

5. The comment is correct. The proposed specifications have been revised.

NRC Question

6. Provide additional justification for considering some snubbers inside containment as accessible during power operation. This justification should address ALARA concerns, as well as other safety concerns regarding exposure of snubber inspection personnel to the additional radiation hazards, high heat and humidity, and the subatmospheric containment environment. Clarify how snubber reliability will be improved by reclassifying some snubbers currently considered inaccessible as accessible.

Response

6. Not applicable to this submittal, because we have not addressed accessible and inaccessible requirements and constraints in this request.

NRC Question

7. Safety Evaluation for SPS Technical Specification Change

There are two statements in the Safety Evaluation which requires clarification. These are as follows:

- a. "Second line of second paragraph" .... within the broad family of mechanical snubbers." Since all mechanical snubbers installed at Surry were manufactured by PSA, and the various sizes of PSA snubbers are essentially similar in design, clarification of this statement is necessary.
- b. Fifth line of second paragraph - Discussion regarding IE Bulletin 81-01 inspection criteria needs clarification or revision.

IE Bulletin 81-01 contained two sets of inspection criteria. One set of criteria was specified for INC snubbers and was based on numerous problems identified with these type snubbers. The other set of criteria was for all other types of mechanical snubbers, which had experienced low failure rates. The different criteria were not based on design differences, but rather generic problems identified with the INC snubbers.

Response

7. Not applicable to this submittal because subgrouping was not addressed. These statements were removed from the safety evaluation.