

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

SURRY POWER STATION

UNITS 1 AND 2

8804060271 880330
PDR . ADOCK 05000280
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- B. Records relative to the following items shall be retained for the life of the plant.
1. Records of changes made to the plant and plant drawings as described in the FSAR pursuant to the 10 CFR 50.59.
 2. Records of new and spent fuel inventory and assembly histories.
 3. Records of plant radiation and contamination surveys.
 4. Records of off-site environmental monitoring surveys.
 5. Records of radiation exposure of all plant personnel, and others as required by 10 CFR 20.
 6. Records of radioactivity in liquid and gaseous wastes released to the environment.
 7. Primary records of inservice inspections performed pursuant to Section XI of the ASME Code, as required by 10 CFR 50.55a, and primary records of inservice inspections performed pursuant to these Technical Specifications. If radiographs are taken or if photographs of scope traces (ultrasonic examination) or surface examination indications are taken, the radiographs and photographs shall be retained for the life of the plant.
 8. Records of Environmental Qualification which are covered under the provisions of paragraph 6.7.

ATTACHMENT 2

DESCRIPTION OF CHANGE

AND

SAFETY EVALUATION

DISCUSSION

The transcript of the ASLB proceeding in the matter of the welding practices at Surry Power Station (March, 1972) was reviewed to determine the basis for the augmented requirements for retaining photographs. Specifically, page 416 through Page 430 of the transcript documents Chairman Yore's request for draft augmented inspection plans from the NRC staff. The inspection plan that was developed clearly formed the bases for the Surry Power Station Technical Specification requirements for inservice inspections.

The proposed change to the Surry Units 1 and 2 Technical Specification 6.5.B.7 clarifies the requirement to retain photographs, when taken, to support subsequent inspections or evaluations as may be necessary. There is no requirement to take photographs beyond those normally obtained to support the ASME Section XI inspection program.

DESCRIPTION OF CHANGE AND SAFETY EVALUATION INSERVICE INSPECTION RECORDS

DESCRIPTION OF CHANGE

The Surry Power Station Units 1 and 2 Technical Specification 6.5.B.7 "Station Operating Records" states the requirements for maintaining the records of inservice inspections for the life of the plant. The records required to be retained are defined, in part, to include radiographs (of welds which are radiographed), photographs of the scope traces for welds which are tested by ultrasonic techniques and photographs of the surface of those welds inspected by a visual or surface examinations.

The wording of this paragraph was developed by the Atomic Safety and Licensing Board (ASLB) which ordered that these requirements be included in the Surry Units 1 and 2 Technical Specification in the decision rendered on April 26, 1972. This ASLB review was with regard to the issue of disputed welds and welding practices during the construction of Surry Unit 1. This wording is unclear since it does not specify the codes or standards that apply nor the specific requirement for photographs. It appears that the original intent of the ASLB decision was to require the retention of records normally obtained in accordance with the ASME Section XI code and to further require the retention of radiographs and photographs when they are taken. There was no additional requirement to take photographs identified by the ASLB order. However, if photographs were taken of scope traces or surface examination indications, they were to be retained for the life of the plant. This change to T.S. 6.5.B.7 will clarify the requirement for retaining inservice inspection records in accordance with the intent of the ASLB ruling.

SAFETY EVALUATIONS

50.59 Safety Evaluation

This proposed change to the Surry Technical Specifications clarifies an ambiguous Specification and does not alter the ASLB decision referenced above. The Specification is administrative in nature and the change is editorial. The proposed change has been reviewed and it is concluded that no unreviewed safety question exists as defined in 10 CFR 50.59. The basis for this conclusion follows:

- (i) The proposed change is an editorial change to an administrative specification. The probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety previously evaluated in the safety analysis report does not increase.
- (ii) The change further defines the inservice inspection records to be retained and does not create the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report.
- (iii) Additionally, the margin of safety as defined in the basis for any Technical Specification is not reduced by this editorial change.

50.92 No Significant Hazards Determination

This proposed change to the Surry Technical Specifications has been reviewed pursuant to the requirements of 10 CFR 50.92 and it has been determined that a significant safety hazard is not created. Specifically, the operation of Surry Power Station with the proposed amendment will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed amendment does not affect plant operation nor does it alter the requirements for inservice inspection methods, scope, or frequency. Only the requirements for retaining records are clarified in this amendment.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed amendment does not affect the material or physical condition of the station systems, structures or components. There is no new or different kind of accident created since the amendment is a clarification of previous requirements.
3. Involve a significant reduction in the margin of safety. The proposed amendment does not affect the margin of safety since there is no reduction in the requirements to conduct an inservice inspection program in accordance with the ASME Section XI Code, the augmented inspection requirements of the Technical Specification and the ASLB decisions.

ATTACHMENT 3

APPLICATION FEE