

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 4, 1998

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 98-649
SPS-LIC/CGL R0
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATIONS AND BASIS CHANGES
REVISED EDG START/LOAD TIME TESTING AND EDG RATINGS

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications to Facility Operating License Numbers DPR-32 and DPR-37 for Surry Power Station Units 1 and 2. The proposed change will revise the EDG start and load time testing requirements in Technical Specification 4.6.A.1.b. Also provided for your information is a revision to the Technical Specification 3.16 Basis, regarding EDG ratings. A discussion of the proposed Technical Specifications change, as well as the Basis change, is provided in Attachment 1.

The proposed Technical Specifications and Basis changes have been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee. It has been determined that the proposed Technical Specifications and Basis changes do not involve an unreviewed safety question, as defined in 10 CFR 50.59. The proposed Technical Specifications and Basis changes are provided in Attachment 2. The basis for our determination that the Technical Specifications change does not involve a significant hazards, as defined in 10 CFR 50.92, is provided in Attachment 3.

Should you have any questions or require additional information, please contact us.

Very truly yours,



James P. O'Hanlon
Senior Vice President - Nuclear

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Attachments:

1. Discussion of Changes
2. Proposed Technical Specifications and Basis Changes
3. Significant Hazards Consideration Determination

Commitments made in this letter: None.

cc: U.S. Nuclear Regulatory Commission
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Mr. R. A. Musser
NRC Senior Resident Inspector
Surry Power Station

Commissioner
Department of Radiological Health
Room 104A
1500 East Main Street
Richmond, VA 23219

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by J. P. O'Hanlon, who is Senior Vice President - Nuclear, of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 4th day of November, 19 98.

My Commission Expires: March 31, 2000.

Maggie McCause
Notary Public



(SEAL)

ATTACHMENT 1

DISCUSSION OF CHANGES

**VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2**

DISCUSSION OF CHANGES

INTRODUCTION

During a recent review, a discrepancy between the EDG start and load testing time discussed in the Technical Specifications (TS) and the UFSAR was identified. In addition, the need for clarification and correction of the EDG ratings in a TS Basis was identified. It was determined that changes to the TS, TS Basis, and the UFSAR are necessary to correct these items.

Neither the TS change (EDG start and load testing time) nor the TS Basis revision (EDG ratings) impacts the EDGs' capability to operate or perform. Furthermore, it has been determined that these changes have no negative impact on safety and do not involve an unreviewed safety question.

The TS change is being submitted to the NRC for review and approval. The TS Basis revision is included for the NRC's information.

SPECIFIC CHANGES

Section 4.6 of the Surry Technical Specifications and the Basis for Specification 3.16 are being revised to clarify surveillance requirements, as well as to correct and bring about consistency in the wording of the TS, TS Basis and UFSAR for the following specific items:

- TS 4.6.A.1.b

The TS surveillance testing regarding automatic starting of each emergency diesel generator, load shedding and restoration to operation of particular vital equipment, initiated by a simulated loss of off-site power together with a simulated safety injection signal is revised to read that the test will be conducted during shutdown for refueling to assure that the diesel generator "will start and accept load in less than or equal to 10 seconds" rather than "will start within 10 sec and assume load in less than 30 sec" after the engine starting signal.

- TS Basis 3.16

The discussion of diesel generator ratings is revised to read that "The diesel generators have a cumulative 2,000 hour rating of 2750 kW" rather than "...a continuous 2,000 hour rating of 2750 kW and a two hour rating of 2850 kW."

BACKGROUND

The current TS 4.6 and TS 3.16 Basis wording cited above was included in the original Surry TSs issued in 1972.

To satisfy the requirements of TS 4.6.A.1.b, Virginia Electric and Power Company performs Emergency Diesel Generator (EDG) surveillance testing in accordance with periodic test procedures ½-OPT-ZZ-001 and ½-OPT-ZZ-002. These procedures ensure that the EDGs "attain proper speed and voltage and pick up (load) within 10 seconds of receipt of a degraded voltage/safety injection signal." The current technical specification requires that the diesels start within 10 seconds and assume load in less than 30 seconds. The 30-second load assumption requirement is readily satisfied by meeting the 10-second requirement of periodic test procedures ½-OPT-ZZ-001 and ½-OPT-ZZ-002.

The "less than 30 seconds" value in the TS is vague and has no specific safety significance or relevance to the EDGs design function. The proposed 10-second value for EDG starting and accepting load is found in accident analysis discussions and is the correct value to be applied as a technical specification requirement.

The need to correct this Technical Specification with respect to wording in UFSAR Section 8.5 ("...about 25 seconds...") was identified recently and it was determined that changes to both the UFSAR and TS are necessary.

The TS 3.16 Basis states that the diesel generators have a continuous 2,000-hour rating of 2750 kW and a two-hour rating of 2850 kW. The reference to the 2750 kW 2,000-hour rating is appropriate for the diesels' service application (of providing post-accident emergency power), but the terminology is being changed (from continuous 2,000-hour rating to cumulative 2,000-hour rating) for consistency with the manufacturer's nomenclature. In contrast, the 2850 kW two-hour rating not only is an inappropriate rating for the Surry diesels' service application, but also reflects an incorrect value. Present performance testing only addresses the 2,000-hour rating, and the limit on this testing is 2750 kW. Therefore, the reference to the two-hour rating is being deleted in both the TS Basis and the UFSAR.

SAFETY SIGNIFICANCE

The proposed change to Technical Specification 4.6.A.1.b does not affect the time in which an Emergency Diesel Generator (EDG) is required to start and accelerate to the set of conditions necessary for the EDG to accept load. However, the proposed change does conservatively alter the TS time requirement for the EDG to begin to accept load. The change eliminates a surveillance requirement value that has no safety or design significance and replaces it with a more stringent value that is also the correct one. The change does not affect the operation or testing of the EDGs because the proposed TS surveillance test requirement is identical to the value that has been procedurally required and met.

Specifically, the proposed change replaces the current surveillance requirement for the EDG to start within 10 seconds and assume load in "less than 30 seconds" with the correct design basis requirement to start and accept load in "less than or equal to 10 seconds...." Current surveillance test procedures require the EDG to start and pick up

load within 10 seconds which is consistent with the proposed change. Therefore, the proposed TS change has no impact on the operation or design of the EDGs, their support equipment and systems, or on the existing surveillance testing of that equipment.

The proposed change does not modify the components or timing for them to be loaded onto the EDGs; there is no impact on their capability to perform, nor is there any change in the likelihood that the EDGs or any component or subsystem will fail to perform. As a result, the proposed change does not involve any increase in the probability or the consequences of any accident or malfunction of equipment important to safety previously evaluated. There are no physical changes to the plant or to its methods of operation; therefore, there is no possibility of a new or different kind of accident or malfunction of equipment important to safety created. The proposed revision makes no changes to the condition or performance of equipment or system used in accident mitigation or assumed for any accident analysis that could reduce a margin of safety as described in the basis for any TS. The current surveillance testing continues to satisfy the revised requirement.

The proposed change to the Basis for TS 3.16 clarifies the terminology of the 2,000-hour rating and deletes the reference to the two-hour rating because it is not an appropriate rating for the service application of these diesels at the Surry Power Station and the value provided is incorrect.

The proposed Basis change does not modify the EDGs, or associated components or systems. There is no impact on their capability to perform, nor is there any change in the likelihood that the EDGs or any component or subsystem will fail to perform. As a result, the proposed change does not involve any increase in the probability or consequences of any accident or malfunction of equipment important to safety previously evaluated. There are no physical changes to the plant or to its methods of operation. Therefore, there is no possibility of a new or different kind of accident or malfunction of equipment important to safety created. The proposed Basis revision makes no actual changes to the condition or performance of equipment or system used in accident mitigation or assumed for any accident analysis that could reduce a margin of safety as described in the basis for any TS.

Based upon the above considerations, the proposed changes to TS 4.6.A.1.b and to TS Basis 3.16 have no negative impact on safety and do not involve or result in an unreviewed safety question.

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATIONS AND BASIS CHANGES

**VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2**