2. If a primary source is not available, the unit may be operated for seven (7) days provided the dependable alternate source can be operable within 8 hours. If specification A-4 is not satisfied within seven (7) days, the unit shall be brought to the cold shutdown condition.

3. One battery may be inoperable for 24 hours provided the other battery and battery chargers remain operable with one battery charger carrying the DC load of the failed battery's supply system. If the battery is not returned to operable status within the 24 hour period the reactor shall be placed in the hot shutdown condition. If the battery is not restored to operable status within an additional 48 hours, the reactor shall be placed in the cold shutdown condition.

4. A train of the opposite unit's emergency power system as required by Section 3.16.A.8 above may be inoperable for a period not to exceed 14 days. During this 14 day period, the following limitations apply:

   a) If the offsite power source becomes unable to energize the opposite unit's operable train, operation may continue provided its associated emergency diesel generator is energizing the operable train.

   b) If the opposite unit's operable train's emergency diesel generator becomes unavailable, operation may continue for 72 hours provided the offsite power source is energizing the opposite unit's operable train.

   c) Return of the originally inoperable train to operable status allows the second inoperable train to revert to the 14 day limitation.

   If the above conditions are not met, the reactor shall be brought to hot shutdown conditions within 6 hours and cold shutdown condition within the following 30 hours.

C. The continuous running electrical load supplied by an emergency diesel generator shall be limited to 2750 KW.

Basis

The Emergency Power System is an on-site, independent, automatically starting power source. It supplies power to vital unit auxiliaries if a normal power source is not available. The Emergency Power System consists of three diesel generators for two units. One generator is used exclusively for Unit 1, the second generator for Unit 2, and the third generator functions as a backup for either Unit 1 or 2. The diesel generators have a cumulative 2,000 hour rating of 2750 KW. The actual loads using conservative

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b. Automatic start of each 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. Testing will demonstrate load shedding and load sequencing initiated by a simulated loss of off-site power following a simulated engineered safety features signal. Testing will also demonstrate that the loss of voltage and degraded voltage protection is defeated whenever the emergency diesel is the sole source of power to an emergency bus and that this protection is automatically reinstated when the diesel output breaker is opened. This test will be conducted during reactor shutdown for refueling to assure that the diesel generator will start and accept load in less than or equal to 10 seconds after the engine starting signal.

c. Availability of the fuel oil transfer system shall be verified by operating the system in conjunction with the monthly test.

d. Each diesel generator shall be given a thorough inspection once per 18 months utilizing the manufacturer's recommendations for this class of stand-by service.

2. Acceptance Criteria

The above tests will be considered satisfactory if all applicable equipment operates as designed.

B. Fuel Oil Storage Tanks for Diesel Generators

1. A minimum fuel oil storage of 35,000 gal shall be maintained on-site to assure full power operation of one diesel generator for seven days.

ATTACHMENT 3

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Virginia Electric and Power Company proposes to change Section 4.6.A.1.b of the Surry Technical Specifications and the Basis for Specification 3.16 to clarify surveillance requirements and to correct and bring about consistency in the wording of the TS, TS Basis and UFSAR. The Basis change has been included for NRC's information. The requirements of 10 CFR 50.92 have been reviewed as they relate to the proposed Technical Specifications (TS) change for the Surry Units 1 and 2. We have determined that a significant hazards consideration is not involved as discussed below:

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. The proposed change does 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 technically correct one. The change does not affect the operation or testing of the EDGs because the proposed TS surveillance test requirement is the value that has always been procedurally required and met.

In the Federal Register, Vol. 51, No. 44, dated March 6, 1986, "Rules and Regulations," the NRC provided guidance for the determination of significant hazards considerations. Under item (e) regarding examples of Technical Specifications amendments that are considered not likely to involve a significant hazards consideration, the following example is listed:

(ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, *e.g.,* a more stringent surveillance requirement.

The proposed change specifically replaces the surveillance requirement for the EDG to "...start within 10 sec and assume load in less than 30 sec..." with the more stringent 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.

Criterion 1 - Operation of the Surry Units 1 and 2 in accordance with the proposed Technical Specification change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

The currently specified "less than 30 seconds" time to be replaced has no specific safety significance or design basis regarding EDG starting. The proposed time change to "less than or equal to 10 seconds" is more conservative and in agreement with

current accident analysis and surveillance testing. These changes do not, in any way, affect the as-built conditions of the plant and do not affect the initiators of analyzed events or the assumed mitigation of accident or transient events. Analyzed events are initiated by the failure of plant structures, systems or components. The proposed changes do not impact the condition or performance of these structures, systems or components. Consequences of analyzed events are the result of the plant being operated within assumed parameters at the onset of any event, and the successful functioning of at least one train or division of the equipment credited with mitigating the event. There is no impact on the capability of the credited equipment to perform, nor is there any change in the likelihood that credited equipment will fail to perform. As a result, there is no significant increase in the probability or consequences of any accident previously evaluated and Criterion 1 is, thereby, satisfied.

Criterion 2 - The proposed Technical Specifications change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not involve a physical alteration of the plant, or a change in the methods used to operate the plant or to respond to plant transients. No new or different equipment is being installed and no installed equipment is being removed or operated in a different manner. There is no alteration to the parameters within which the plant is normally operated or in the setpoints, which initiate protective or mitigative actions. Consequently, no new failure modes are introduced and the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated and Criterion 2 is, thereby satisfied.

Criterion 3 - The proposed Technical Specifications change does not involve a significant reduction in a margin of safety.

Margin of safety is established through the design of the plant structures, systems and components, the parameters within which the plant is operated, and the establishment of the setpoints for the actuation of equipment relied upon to respond to an event. The replacement of the "less than 30 seconds" requirement for loading the EDGs with the more stringent "less than or equal to 10 seconds" requirement makes no change 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. Therefore, the proposed changes do not involve a significant reduction in any margin of safety described in the bases for the Technical Specifications and Criterion 3 is, thereby, satisfied.