

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATIONS CHANGE PAGES
RELOCATION OF FIRE PROTECTION REQUIREMENTS
SURRY POWER STATION

VIRGINIA ELECTRIC AND POWER COMPANY

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PROPOSED TECHNICAL SPECIFICATIONS CHANGE PAGES RELOCATION OF FIRE PROTECTION REQUIREMENTS SURRY POWER STATION

Virginia Electric and Power Company previously requested the subject license amendment for Surry Power Station to relocate the fire protection requirements from the Technical Specifications to the Updated Final Safety Analysis Report (UFSAR) consistent with NRC guidance. The proposed Technical Specifications change request was originally submitted for NRC review and approval by letter dated January 23, 1993. Since then, only one change has been made to the affected pages of the Technical Specifications by other license amendments. Page 6.1-8 of the Surry Units 1 and 2 Technical Specifications was revised by License Amendments 188 and 188, respectively.

The following are the up-to-date Technical Specifications pages reflecting the proposed changes requested by this license amendment request.

when the Health Physics Coordinator for the Steam Generator Repair Program determines, based on an evaluation involving ALARA considerations, that their use will increase overall occupational radiation exposure to workers involved in the repair activities.

- (c) The health physics program and procedures which have been established for the steam generator repair program shall be implemented.
- (d) Progress reports shall be provided at 60 day intervals from the start of the repair program and due 30 days after close of the interval with a final report provided within 60 days after completion of the repair. These reports will include:
 - (i) A summary of the occupational exposure expended to date using the format and detail of Table 5.3-1 of the report entitled "Steam Generator Repair Program."
 - (ii) An evaluation of the effectiveness of dose reduction techniques as specified in Chapter 6 of the report entitled "Steam Generator Repair Programs" in reducing occupational exposures.
 - (iii) An estimate of radioactivity released in both liquid and gaseous effluents.
 - (iv) An estimate of the solid radioactive waste generated during the repair effort including volume and radioactive content.
- (3) Sixty days prior to fuel loading, the program for preoperational testing and startup shall be submitted for NRC review.
- H. The licensee shall maintain in effect and fully implement all provisions of the Commission-approved physical security plan, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p). The approved security plan consists of documents withheld from public disclosure pursuant to 10 CFR 2.790(d), referred to as Surry Power Station Unit Nos. 1 and 2 Physical Security Plan, dated November 30, 1977, as revised September 25, 1978, supplemented (Chapter 10) October 25, 1978, revised January 12, 1979, and supplemented February 16, 1979.

- I. The licensee shall implement and maintain in effect the provisions of the approved fire protection program as described in the Updated Final Safety Analysis Report and as approved in the SER dated September 19, 1979, and supplements thereto subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- J. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Surry Power Station Physical Security Plan," with revisions submitted through February 24, 1988; "Surry Power Station Guard Training and Qualification Plan," with revisions submitted through May 29, 1987; and "Surry Power Station Safeguards Contingency Plan," with revisions submitted through January 9, 1987. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

K. Secondary Water Chemistry Monitoring Program

The licensee shall implement a secondary water chemistry monitoring program to inhibit steam generator tube degradation. This program shall include:

1. Identification of a sampling schedule for the critical parameters and control points for these parameters;
2. Identification of the procedures used to quantify parameters that are critical to control points;
3. Identification of process sampling points;
4. Procedure for the recording and management of data;
5. Procedures defining corrective actions for off control point chemistry conditions; and
6. A procedure for identifying the authority responsible for the interpretation of the data, and the sequence and timing of administrative events required to initiate corrective action.

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7. DELETED
8. DELETED
9. The health physics technician requirement of Specification 6.1.B.5 may not be met for a period of time not to exceed 2 hours in order to accommodate an unexpected absence provided immediate action is taken to fill the required position.
10. Procedure will be established to insure that NRC policy statement guidelines regarding working hours established for employees are followed. In addition, procedures will provide for documentation of authorized deviations from those guidelines and that the documentation is available for NRC review.

9. Deleted.
10. Deleted.
11. Review of every unplanned onsite release of radioactive material to the environs exceeding the limits of Specification 3.11, including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President - Nuclear Operations and to the Management Safety Review Committee.
12. Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.
13. Review of the Fire Protection Program and implementing procedures and shall submit recommended changes to the Station Manager.

g. Authority

The SNSOC shall:

1. Provide written approval or disapproval of items considered under (1) through (3) above. SNSOC approval shall be certified in writing by an Assistant Station Manager.
2. Render determinations in writing with regard to whether or not each item considered under (1) through (5) above constitutes an unreviewed safety question.
3. Provide written notification within 24 hours to the Vice President - Nuclear Operations and to the Management Safety Review Committee of disagreement between SNSOC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.A above.