

Attachment 2

Proposed Supplemental Technical Specifications Change

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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 Program changes to the designated offsite management responsible for reviewing changes that pertain to Fire Protection.

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 either the Manager - Station Operations and Maintenance or the Manager - Station Safety and Licensing.
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 Site Vice President; however, the Site Vice President shall have responsibility for resolution of such disagreements pursuant to 6.1.A above.

h. Records

The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the Vice President - Nuclear Operations and to the Management Safety Review Committee.

- D. All procedures described in Specifications 6.4.A and 6.4.B shall be followed.
- E. The facility Fire Protection Program and implementing procedures which have been established for the station shall be implemented and maintained.
- F. Deleted
- G. In cases of emergency, operations personnel shall be authorized to depart from approved procedures where necessary to prevent injury to personnel or damage to the facility. Such changes shall be documented, reviewed and approved by the Station Nuclear Safety and Operating Committee.

Attachment 3

Significant Hazards Consideration Determination

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Virginia Electric and Power Company has reviewed the proposed Technical Specifications change against the criteria of 10 CFR 50.92 and has concluded that the change does not pose a significant safety hazards consideration as defined therein. The proposed Technical Specifications change is administrative in nature. The change revises the review requirements for changes to the Fire Protection Program and implementing procedures and re-instates, in part, a previously deleted Technical Specification that requires the establishment, implementation and maintenance of the Fire Protection Program and implementing procedures.

The two requirements that are being incorporated into the TS are consistent with GL 88-12 guidance for relocating Fire Protection requirements in the TS to the UFSAR and supplements our original TS submittal dated January 26, 1993 (Serial No. 92-727). Since these two changes only deal with administrative requirements, neither of these two specific changes would result in a significant hazards consideration. Therefore, 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 probability of an accident is not increased as a result of this Technical Specifications change request. This is an administrative change and merely incorporates two additional requirements for ensuring that the Fire Protection Program and implementing procedures are appropriately established, implemented and maintained, and that changes to the Program and implementing procedures receive the appropriate offsite review. The consequences of an accident previously evaluated are not increased since the station will not be operated differently, and no physical modifications are being made to plant systems or components.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

A new or different type of accident is not being created since this TS change request is administrative. As noted above, the station will not be operated differently, and no physical modifications are being made to plant systems or components. Administrative revisions regarding the establishment, implementation and maintenance of a TS requirement for a Fire Protection Program and implementing procedures and the imposition of an offsite review for changes thereto does not create a new or different type of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety.

The margin of safety as defined in the Technical Specifications is not reduced since system/component performance as assumed in the existing safety analyses is not being affected by the proposed TS change. The TS change is administrative in nature and, as such, has no effect on station operation. The Fire Protection Program is being retained and maintained in the UFSAR and station procedures.

Attachment 4

Complete Proposed Technical Specifications Pages

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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TECHNICAL SPECIFICATION
TABLE OF CONTENTS

<u>SECTION</u>	<u>TITLE</u>	<u>PAGE</u>
3.15	DELETED	
3.16	EMERGENCY POWER SYSTEM	TS 3.16-1
3.17	LOOP STOP VALVE OPERATION	TS 3.17-1
3.18	MOVABLE INCORE INSTRUMENTATION	TS 3.18-1
3.19	MAIN CONTROL ROOM BOTTLED AIR SYSTEM	TS 3.19-1
3.20	SHOCK SUPPRESSORS (SNUBBERS)	TS 3.20-1
3.21	DELETED	
3.22	AUXILIARY VENTILATION EXHAUST FILTER TRAINS	TS 3.22-1
3.23	CONTROL AND RELAY ROOM VENTILATION SUPPLY FILTER TRAINS	TS 3.23-1
4.0	<u>SURVEILLANCE REQUIREMENTS</u>	TS 4.0-1
4.1	OPERATIONAL SAFETY REVIEW	TS 4.1-1
4.2	AUGMENTED INSPECTIONS	TS 4.2-1
4.3	ASME CODE CLASS 1, 2, AND 3 SYSTEM PRESSURE TESTS	TS 4.3-1
4.4	CONTAINMENT TESTS	TS 4.4-1
4.5	SPRAY SYSTEMS TESTS	TS 4.5-1
4.6	EMERGENCY POWER SYSTEM PERIODIC TESTING	TS 4.6-1
4.7	MAIN STEAM LINE TRIP VALVES	TS 4.7-1
4.8	AUXILIARY FEEDWATER SYSTEM	TS 4.8-1
4.9	RADIOACTIVE GAS STORAGE MONITORING SYSTEM	TS 4.9-1
4.10	REACTIVITY ANOMALIES	TS 4.10-1
4.11	SAFETY INJECTION SYSTEM TESTS	TS 4.11-1
4.12	VENTILATION FILTER TESTS	TS 4.12-1
4.13	DELETED	
4.14	DELETED	

TECHNICAL SPECIFICATION
TABLE OF CONTENTS

<u>SECTION</u>	<u>TITLE</u>	<u>PAGE</u>
4.15	AUGMENTED INSERVICE INSPECTION PROGRAM FOR HIGH ENERGY LINES OUTSIDE OF CONTAINMENT	TS 4.15-1
4.16	LEAKAGE TESTING OF MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES	TS 4.16-1
4.17	SHOCK SUPPRESSORS (SNUBBERS)	TS 4.17-1
4.18	DELETED	
4.19	STEAM GENERATOR INSERVICE INSPECTION	TS 4.19-1
4.20	CONTROL ROOM AIR FILTRATION SYSTEM	TS 4.20-1
5.0	<u>DESIGN FEATURES</u>	TS 5.1-1
5.1	SITE	TS 5.1-1
5.2	CONTAINMENT	TS 5.2-1
5.3	REACTOR	TS 5.3-1
5.4	FUEL STORAGE	TS 5.4-1
6.0	<u>ADMINISTRATIVE CONTROLS</u>	TS 6.1-1
6.1	ORGANIZATION, SAFETY AND OPERATION REVIEW	TS 6.1-1
6.2	GENERAL NOTIFICATION AND REPORTING REQUIREMENTS	TS 6.2-1
6.3	ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDED	TS 6.3-1
6.4	UNIT OPERATING PROCEDURES	TS 6.4-1
6.5	STATION OPERATING RECORDS	TS 6.5-1
6.6	STATION REPORTING REQUIREMENTS	TS 6.6-1
6.7	ENVIRONMENTAL QUALIFICATIONS	TS 6.7-1
6.8	PROCESS CONTROL PROGRAM AND OFFSITE DOSE CALCULATION MANUAL	TS 6.8-1

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. Procedures 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.

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