

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

November 22, 1994

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Serial No. 94-667  
NL&P/GDM 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 SPECIFICATION CHANGE**

Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications, to Operating License Nos. DPR-32 and DPR-37 for the Surry Power Station Units 1 and 2, respectively. The proposed change deletes unnecessary descriptive phrases regarding the number of cells in the station and emergency diesel generator batteries. The proposed change is discussed in Attachment 1.

This request has 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 change does not involve an unreviewed safety question as defined in 10 CFR 50.59 or a significant hazards consideration as defined in 10 CFR 50.92. The proposed change to the Technical Specifications and the basis for our no significant hazards consideration determination are included in Attachments 2 and 3, respectively.

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

Very truly yours,



James P. O'Hanlon  
Senior Vice President - Nuclear

300069

9412010183 941122  
PDR ADDCK 05000280  
P PDR



cc: U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N. W.  
Suite 2900  
Atlanta, Georgia 30323

Mr. M. W. Branch  
NRC Senior Resident Inspector  
Surry Power Station

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 is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 22<sup>nd</sup> day of November, 1994.

My Commission Expires: May 31, 1998.

Vicki L. Hull  
Notary Public

(SEAL)

**Attachment 1**  
**Discussion of Changes**

## DISCUSSION OF CHANGES

### INTRODUCTION

The Technical Specifications include surveillance requirements for the station and emergency diesel generator batteries to ensure they are capable of performing their intended safety functions. These specifications use the descriptive phrases "60 cell battery" and "56 cell battery" to refer to the station battery and emergency diesel battery, respectively. To preclude the possibility that the number of cells noted in these phrases may be interpreted as a technical requirement, the descriptive references regarding the number of cells are being deleted by this proposed administrative change.

### BACKGROUND

Virginia Electric and Power Company (Virginia Power) received enforcement discretion to complete maintenance on Surry Unit 2 station batteries in a letter from the NRC dated October 31, 1994. During discussions with the NRC on the enforcement discretion, the significance of the number of cells in a station battery was also discussed in terms of the descriptive phrases used in Technical Specifications 4.6.C.1.a and b. In these sections, the station battery is referred to as a "60 cell battery." Our position is that the reference to "60 cell" is merely a descriptive phrase. The number of cells is not intended as a technical requirement nor is it relevant in determining battery operability. If the voltage and capacity of the station battery are adequate to power the required safety related equipment during accident and loss of AC power conditions, the battery is considered operable. This was demonstrated during the enforcement discretion by establishing that a 58 cell station battery was adequate to ensure safety function. The operability of individual battery cells is established through the appropriate surveillance tests and acceptance criteria prescribed in the Technical Specifications. The NRC accepted this interpretation during a telephone call between Mr. M. L. Bowling of Virginia Power and Messrs. D. M. Verrelli and G. A. Belisle of the NRC on October 28, 1994, and confirmed in the subsequent enforcement discretion that a Technical Specification change clarifying the descriptive reference would be submitted to the NRC. The proposed Technical Specification change provides this clarification to the Technical Specifications.

Likewise, a clarification is also being requested for the emergency diesel generator batteries discussed in Technical Specifications 4.6.D.1.a and b. In these sections, the Technical Specifications refer to each emergency diesel generator battery as a "56 cell battery." The descriptive phrase "56 cell" is likewise being deleted for these batteries. The reference to "56 cells" in the Technical Specifications is not technically significant in determining battery operability. If the voltage and capacity of the emergency diesel generator battery are adequate to perform the intended safety function, the battery is considered operable. Operability of individual battery cells is determined by appropriate surveillance tests and acceptance criteria in accordance with Technical Specifications.

Deletion of the descriptive references was reviewed for consistency with NUREG-0452, Revision 4, "Standard Technical Specifications for Westinghouse Pressurized Water

Reactors." The Standard Technical Specifications do not specify the number of cells that make up either the station or emergency diesel generator batteries. Deletion of the descriptive references will eliminate the need for an interpretation to operate with less than the total number of installed cells operable in a particular battery. Overall battery operability will remain based on the design voltage and capacity requirements necessary to perform safety functions with individual battery cell operability determined by Technical Specification surveillance criteria.

### **SPECIFIC CHANGES**

The Technical Specifications are being revised to delete the descriptive references regarding the number of cells in the station and emergency diesel generator batteries. The Technical Specifications are revised as follows:

- TS 4.6.C.1.a and b - are revised to delete the words "60 cell" prior to the word "battery" in each specification.
- TS 4.6.D.1.a and b - are revised to delete the words "56 cell" prior to the word "battery" in each specification.

### **SAFETY SIGNIFICANCE**

The proposed Technical Specifications change is administrative in nature, deleting the descriptive references to the number of cells in the station and emergency diesel generator batteries (60 cell and 56 cell, respectively). Deletion of the descriptive references will preclude future misunderstanding or the need for interpretation if there is a situation that develops requiring operation with less than the total number of installed cells in a particular battery. Battery operability will remain determined by the design voltage and capacity requirements of the battery.

The proposed change has no impact on the probability of occurrence or consequences of a previously analyzed accident. The change is administrative and, therefore, does not affect the operation of the units. The batteries will continue to be operated in the same manner as before the change. Prescribed surveillance testing will continue to ensure individual battery cell operability. Consequently, eliminating the descriptive references to the number of cells in the station and emergency diesel generator batteries does not contribute to the probability of occurrence or consequences of any design basis accident.

Further, there are no plant modifications or changes in methods of plant operation introduced by the proposed change. The batteries will be operated in the same manner as prior to the change and will still be required to provide the necessary design capacity and voltage to perform their intended safety functions. Therefore, no new accidents or accident precursors are created by the proposed change to eliminate descriptive references regarding the number of cells in the station and emergency diesel generator batteries.

The proposed change also does not affect the margin of safety as defined in the Technical Specifications. The operability requirements of the station and emergency diesel generator batteries are not being changed. This is an administrative change which only deletes descriptive references regarding the number of cells in the station and emergency diesel generator batteries and as such does not affect the margin of safety.