

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 27, 1993

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

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Docket Nos. 50-280
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License Nos. DPR-32
DPR-37
NPF-4
NPF-7

Gentlemen:

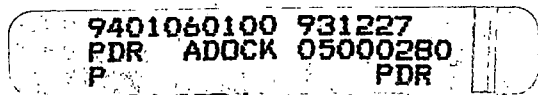
VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
SURRY POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATIONS CHANGE
MSRC AND SNSOC REVIEW RESPONSIBILITIES

Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications, to Facility Operating License Nos. DPR-32 and DPR-37 for Surry Power Station Units 1 and 2, and Facility Operating License Nos. NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2.

The North Anna and Surry Power Station Technical Specifications address the organization and responsibilities of both the onsite and offsite review groups: the Station Nuclear Safety and Operating Committee (SNSOC) and the Management Safety Review Committee (MSRC), respectively. The responsibilities of the SNSOC include the review of new procedures and changes to procedures that affect nuclear safety. The MSRC review responsibilities include the review of safety evaluations and SNSOC meeting minutes and reports. The extent of these review activities will be revised by the proposed changes to ensure the two review groups are focusing on nuclear safety issues and not spending an unnecessary amount of time on activities of minimal safety significance.

Specifically, the proposed changes revise the review responsibilities of SNSOC regarding procedure changes. Rather than reviewing all procedure changes, SNSOC would only review procedure changes that require a safety evaluation. The proposed changes also revise the review responsibilities of the MSRC. Rather than reviewing all of the safety evaluations and SNSOC meeting minutes and reports as presently required by the Technical Specifications, the MSRC would only review a representative sample of these documents.

A discussion of the proposed changes to the North Anna and Surry Technical Specifications is provided in Attachment 1. The revised Technical Specifications for



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Surry Power Station are provided in Attachment 2, and the revised Technical Specifications for North Anna Power Station Unit 1 and Unit 2 are provided in Attachments 3 and 4, respectively.

It has been determined that the proposed changes to the Technical Specifications do 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 basis for our determination that these changes do not involve a significant hazards consideration is provided in Attachment 5. The proposed changes to the Technical Specifications have been reviewed and approved by the SNSOC at each station and the MSRC.

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

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachments

cc: U. S. Nuclear Regulatory Commission
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Mr. M. W. Branch
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Commissioner
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COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by R. F. Saunders, who is Assistant Vice President - Nuclear Operations, for W. L. Stewart 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 27th day of December, 1993.

My Commission Expires: May 31, 1994.

Nicki L. Hull
Notary Public

(SEAL)

Discussion of Changes

Introduction

The North Anna and Surry Power Station Technical Specifications presently address the organization and responsibilities of both the onsite and offsite review groups, the Station Nuclear Safety and Operating Committee (SNSOC) and the Management Safety Review Committee (MSRC), respectively. The responsibilities of the SNSOC include the review of new procedures and changes to procedures that affect nuclear safety. The MSRC review responsibilities include the review of safety evaluations and SNSOC meeting minutes and reports. It is proposed that the extent of these review activities be revised in the Technical Specifications to ensure the two review groups are focusing on nuclear safety issues and not spending an unnecessary amount of time on administrative activities of minimal safety significance.

Background

SNSOC Review of Procedures and Procedure Changes

North Anna and Surry Technical Specifications require SNSOC to review and approve new procedures to be used at the station. This ensures that each new procedure is evaluated for its impact on nuclear safety prior to implementation. These specifications also require SNSOC to review changes to these procedures as well as changes to any other procedures as determined by the Station Manager.

The purpose of the SNSOC review of procedure changes is to ensure that procedures currently in use at the station maintain nuclear safety. However, Technical Specifications do not differentiate as to safety significance and currently require procedure changes to be approved by SNSOC, whether the changes have the potential for affecting nuclear safety or not. As a result, SNSOC reviews numerous procedure changes that have no nuclear safety significance. The proposed changes to the Technical Specifications would delete the requirement for SNSOC to review procedure changes that do not have the potential for affecting nuclear safety.

The current program for upgrading and revising procedures involves numerous checks and balances to ensure the adequacy and accuracy of the procedures. The

form used to generate a procedure change includes screening criteria the preparer must consider to determine if a safety evaluation is required for the proposed change. Individuals trained on the purpose and preparation of activity screenings and safety evaluations must sign as the preparer or reviewer of the activity screening. Furthermore, administrative procedures require cognizant management review of the procedure change prior to its implementation.

Procedure changes that do not require a safety evaluation, as determined by the screening criteria, receive adequate review in accordance with administrative procedures. Additional SNSOC review of such changes is unnecessary since these changes have already been determined as not affecting nuclear safety. Releasing SNSOC from the administrative burden of reviewing safety insignificant procedure changes permits SNSOC to focus on more safety significant plant activities.

The proposed Technical Specifications changes will require SNSOC to review and approve only new procedures and procedure changes that require a safety evaluation. Procedure changes that are determined not to be safety significant by the screening criteria will be reviewed and approved by cognizant management in accordance with administrative procedures. The proposed changes also delete the existing requirements in the Technical Specifications that address temporary procedure changes. These procedure changes will be processed pursuant to the requirements for procedure changes in general as noted above (i.e., reviewed by SNSOC if they require a safety evaluation, and processed in accordance with administrative procedures if no safety evaluation is required.)

MSRC Review of Safety Evaluations and SNSOC Meeting Minutes

The MSRC serves as the offsite management review group for Surry Power Station and advises the Senior Vice-President - Nuclear on matters affecting nuclear safety. The specific responsibilities of the MSRC are detailed in the Technical Specifications. These responsibilities include the review of safety evaluations prepared pursuant to the requirements of 10 CFR 50.59, proposed changes involving unreviewed safety questions, proposed Technical Specification changes, significant operating abnormalities or deviations, violations of regulations having safety significance, events requiring written notification to the NRC, SNSOC meeting minutes and reports, and recognized indications of an unanticipated deficiency that could affect nuclear safety.

The Technical Specifications require the MSRC to independently review the safety evaluations required by 10 CFR 50.59 for 1) changes to procedures, equipment or systems and 2) tests or experiments. This subsequent independent review is conducted to separately verify that the preparer's determination of whether an unreviewed safety question exists is accurate and thoroughly supported.

Safety evaluations have been reviewed by the MSRC since its formation approximately four years ago. The MSRC review is completed after the safety evaluations have been approved by SNSOC. These reviews have generally concurred with the conclusions of the individual safety evaluations and found them on the whole to be consistently implemented. Furthermore, an assessment of the entire safety evaluation program was performed by our independent review group to evaluate the effectiveness of the program and the quality of the safety evaluations being prepared. This assessment did not identify any significant concerns regarding the entire safety evaluation program or in any conclusions of the safety evaluations.

We have concluded that 100% review of safety evaluations by the MSRC is not necessary to assure adequate implementation of the safety evaluation program. We do consider it necessary to continue to provide an independent overview of the safety evaluation program to ensure proper implementation is maintained. However, to accomplish this task, we propose that the MSRC review safety evaluations on a sample basis. The sample size will be programmatically established to be representative of the various safety evaluations being generated and will be subject to modification based on observed performance (MSRC findings and independent program review assessments). Should problems with safety evaluation program implementation be identified, a greater number of reviews would be performed and appropriate corrective actions would be initiated in accordance with programmatic requirements. Independent assessments will continue to be performed periodically to further ensure adequate program implementation.

Similarly, it is proposed that the scope of the MSRC review of SNSOC activities be modified in the Technical Specifications. Specifically, it is proposed that SNSOC meeting minutes and reports be reviewed on a sample basis as part of the MSRC's plant overview function. The size of the sample and content of SNSOC meeting minutes and reports to be reviewed will also be programmatically established and subject to modification based on observed performance. Safety significant items

reviewed by SNSOC will continue to be reviewed in total by the MSRC to verify nuclear safety issues are being properly considered.

The programmatic aspects of the review of safety evaluations and SNSOC meeting minutes and reports will be administratively defined in the appropriate charters and procedures.

Specific Changes

The proposed amendments to the Technical Specifications will revise certain review responsibilities of the SNSOC and the MSRC provided in Section 6, Administrative Controls. The proposed amendments to the Technical Specifications would modify the approval process for procedure changes that do not require a safety evaluation, and state that the MSRC will review a representative sample of safety evaluations and SNSOC meeting minutes and reports. Also, the Technical Specifications that discuss temporary procedure changes would be deleted and replaced with general wording for the review and approval of procedure changes.

Specifically, the Surry Technical Specifications are proposed to be revised as follows:

- Technical Specification 6.1.C.1.f.1 is revised to state that only new procedures and procedure changes that require a safety evaluation or as determined by the Station Manager will be reviewed by SNSOC. For consistency with revised Technical Specification 6.1.C.1.f.1, Technical Specification 6.1.C.1.f.2 has the word "proposed" changed to "new" regarding SNSOC reviewed procedures.
- Technical Specifications 6.1.C.2.g.1 and 6.1.C.2.g.9 are revised to state that the MSRC will review a representative sample of 1) safety evaluations to verify that the safety evaluation program is being effectively implemented and 2) SNSOC meeting minutes and reports, respectively.
- Technical Specification 6.4.C is revised to modify the requirement for SNSOC review and approval of procedure changes. Only those procedure changes that require a safety evaluation will be reviewed and approved by SNSOC. The remaining procedure changes will be reviewed and approved in accordance with administrative procedures.

•Technical Specifications 6.4.E and 6.4.F are deleted. Temporary procedure changes would be processed pursuant to the requirements for procedure changes in general as noted above (i.e., reviewed by SNSOC if they require a safety evaluation, and processed in accordance with administrative procedures if no safety evaluation is required.)

The North Anna Unit 1 and Unit 2 Technical Specifications are proposed to be revised as follows:

- North Anna Unit 1 and Unit 2 Technical Specification 6.5.1.6.a is revised to require that only new procedures discussed in Technical Specification 6.8.1 and 6.8.2, and procedure changes that require a safety evaluation be reviewed by SNSOC.
- North Anna Unit 1 and Unit 2 Technical Specifications 6.5.2.7.a and 6.5.2.7.i are revised to clarify that the MSRC will review a representative sample of safety evaluations and SNSOC meeting minutes and reports, respectively.
- North Anna Unit 1 and Unit 2 Technical Specification 6.8.2 is revised to note that SNSOC will review new procedures and to delete the reference to SNSOC review of procedure changes as this requirement will be delineated in Technical Specification 6.8.3. The last sentence is deleted as this requirement is already stated in Technical Specification 6.5.1.7.a.
- North Anna Unit 1 and Unit 2 Technical Specification 6.8.3 is revised to delete the discussion of temporary changes to procedures. This Technical Specification has been rewritten to discuss the review requirements for procedure changes in general and now states that SNSOC shall review all procedure changes that require a safety evaluation. Procedure changes that do not require a safety evaluation will be reviewed in accordance with administrative procedures.

Safety Significance

The procedure change process is administratively controlled and ensures that qualified, trained individuals and cognizant management are involved in the

preparation, screening and review of procedure change requests. New procedures and procedure changes that are safety significant (i.e., require a safety evaluation) will continue to be reviewed by SNSOC. Procedure changes that are not safety significant will be reviewed and approved in accordance with administrative procedures.

Safety evaluations currently receive a minimum of three reviews: 1) the designated reviewer, 2) the responsible supervisor and 3) SNSOC. A design authority review is also required for safety evaluations that affect core reactivity, facility design or the plant design basis. Therefore, the additional and subsequent independent review of safety evaluations by the MSRC on a sample basis as part of its plant overview function is adequate to ensure proper program implementation. SNSOC meeting minutes and reports will also be reviewed by the MSRC on a sample basis as part of the MSRC's routine plant overview. The sample sizes of the safety evaluations and the SNSOC meeting minutes and reports to be reviewed will be determined by performance and will be increased (or decreased) based on MSRC findings. Furthermore, the effectiveness of the safety evaluation program will be evaluated through periodic assessments by an independent review group. The Quality Assurance department also performs performance-based audits of the MSRC and SNSOC regarding implementation of their Technical Specification responsibilities and conducts informal observations of SNSOC meetings.

The proposed Technical Specifications changes do not increase the probability of occurrence or consequences of an accident because the Technical Specifications being revised are administrative requirements which do not of themselves contribute to any accident precursor or accident consequences. UFSAR accident analyses remain unaffected and bounding. Likewise, the probability of equipment malfunction is also unaffected as these are administrative changes that do not affect any equipment. The administrative reviews which are being affected are adequately addressed by other activities.

A new accident scenario is not initiated since these changes have no direct effect on operations nor is any plant modification being made. Further, the independent review and assessment of safety evaluations and procedures are adequately performed through tiered reviews by cognizant personnel and management.

Since these changes are administrative in nature and have no impact on the UFSAR safety analyses, the margin of safety assumed in the Technical Specifications is not affected.

Therefore, eliminating SNSOC review of procedure changes that do not require a safety evaluation, revising the wording for approval of procedure changes, and modifying the MSRC's duties regarding their review of safety evaluations and SNSOC meeting minutes and reports, will not detrimentally affect nuclear safety. Adequate controls remain in place to ensure proper implementation of procedure changes and safety evaluations and overview of SNSOC activities.