

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

September 1, 1989

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

Serial No. 89-562  
NL/ETS  
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**  
**REACTOR TRIP BYPASS BREAKER TESTING**

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 Licenses No. DPR-32 and DPR-37 for the Surry Power Station Units 1 and 2 respectively.

In accordance with Generic Letter (GL) 83-28, modifications were made to the Surry reactor trip breakers, and a Technical Specification change to define reactor trip breaker and reactor trip bypass breaker testing was requested. This proposed Technical Specification change will correct an error associated with reactor trip bypass breaker testing. That is, in Table 4.1-1, Reactor Trip Bypass Breaker, Item 36, Remarks Column 1) replace "local" with "remote" to describe the location for initiation of the breaker test prior to placing it in service; and 2) replace the automatic shunt trip device test with an automatic undervoltage trip device test each refueling consistent with the Surry breaker design and the guidance provided for this design in GL 85-09. The proposed change is included in Attachment 2.

This request has been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Safety Evaluation and Control Staff. It has been determined that the proposed changes 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 no significant hazards consideration determination is included in Attachment 1 with the Discussion of the Change.

Very truly yours,



W. L. Stewart  
Senior Vice President - Power

Attachments

1. Discussion of Proposed Change
2. Proposed Technical Specification

8909110386 890901  
PDR ADOCK 05000280  
P FDC

A001  
11

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

Mr. W. E. Holland  
NRC Senior Resident Inspector  
Surry Power Station

Commissioner  
Department of Health  
Room 400  
109 Governor Street  
Richmond, Virginia 23219

**ATTACHMENT 1**

**DISCUSSION OF PROPOSED CHANGE**  
**SURRY POWER STATION UNITS 1 AND 2**  
**REACTOR TRIP BYPASS BREAKER TESTING**

**DISCUSSION OF PROPOSED CHANGE**  
**SURRY POWER STATION UNITS 1 AND 2**  
**REACTOR TRIP BYPASS BREAKER TESTING**

**DISCUSSION OF CHANGE**

In accordance with Generic Letter 83-28 modifications were made to the reactor trip breakers to provide a diverse method of actuation for an automatic reactor trip signal. The Surry reactor trip breakers were modified to incorporate the automatic shunt trip function but the bypass breakers were not. Pursuant to Generic Letter 85-09, Virginia Power proposed a Technical Specification that provided the testing requirements for the reactor trip and bypass breakers. However, in our submittal the testing requirements for the bypass breakers with an automatic shunt trip attachment were mistakenly incorporated into the Technical Specifications. The actual method implemented to test the bypass breakers is consistent with the GL 85-09 guidance for the configuration utilized at Surry.

This proposed Technical Specification change to Table 4.1-1, Item 36, "Reactor Trip Bypass Breaker" will replace the automatic shunt trip device test with an automatic undervoltage trip device test on a refueling basis. Also in the same item, the word "local" is being replaced with "remote" to describe the location for initiation of the monthly test of the bypass breaker prior to placing it in service.

**10 CFR 50.92 SIGNIFICANT HAZARDS CONSIDERATION REVIEW**

Virginia Electric and Power Company has reviewed the proposed changes against the criteria of 10 CFR 50.92 and has concluded that the changes as proposed do not pose a significant hazards consideration. Specifically, operation of the Surry Power Station in accordance with the proposed changes will not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident or malfunction of equipment which is important to safety and which has been evaluated in the UFSAR.

The existing design has been reviewed and approved by the NRC in a letter dated November 15, 1984. The plant design does not include an automatic shunt trip feature for the bypass breakers. The bypass breaker trip devices are being tested in accordance with the Generic Letter 85-09, i.e. the undervoltage trip device is tested remotely prior to the bypass breaker being placed in service for the monthly surveillance testing of the reactor trip breaker and an automatic actuation test of the undervoltage trip device is performed on a refueling frequency. The reactor protection system has not been further modified nor has system operation been changed. Eliminating test requirements which are not applicable and replacing them with applicable testing requirements does not increase the probability or the consequences of any accident or malfunction previously evaluated.

**10 CFR 50.92 SIGNIFICANT HAZARDS CONSIDERATION REVIEW**  
**(continued)**

2. Create the possibility of a new or different type of accident from those previously evaluated in the safety analysis report.

The existing design has been reviewed and approved by the NRC in a letter dated November 15, 1984. As discussed above, proper testing of Surry's bypass breaker configuration is being performed. Removing testing requirements which are not applicable will not create a new or different kind of accident than previously evaluated.

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

The reactor trip and bypass breakers are being tested in accordance with the guidance of the Generic Letter 85-09. The test interval and the time allowed for testing have not changed, therefore, the margin of safety has not been changed.