

ATTACHMENT 1

Proposed Technical Specifications Changes

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2. The specific activity of the reactor coolant shall be limited to  $\leq 1.0 \mu\text{Ci/cc}$  DOSE EQUIVALENT I-131 whenever the reactor is critical or the average temperature is greater than  $500^\circ\text{F}$ .
3. The requirements of D-2 above may be modified to allow the specific activity of the reactor coolant  $> 1.0 \mu\text{Ci/cc}$  DOSE EQUIVALENT I-131 but less than  $10.0 \mu\text{Ci/cc}$  DOSE EQUIVALENT I-131. Following shutdown, the unit may be restarted and/or operation may continue for up to 48 hours provided that operation under these circumstances shall not exceed 10 percent of the unit's total yearly operating time. With the specific activity of the reactor coolant  $> 1.0 \mu\text{Ci/cc}$  DOSE EQUIVALENT I-131 for more than 48 hours during one continuous time interval or exceeding  $10.0 \mu\text{Ci/cc}$  DOSE EQUIVALENT I-131, the reactor shall be shut down and cooled to  $500^\circ\text{F}$  or less within 6 hours after detection.
4. If the specific activity of the reactor coolant exceeds  $1.0 \mu\text{Ci/cc}$  DOSE EQUIVALENT I-131 or  $100/\bar{E} \mu\text{Ci/cc}$ , a report shall be prepared and submitted to the Commission pursuant to Specification 6.6.A.2. This report shall contain the results of the specific activity analysis together with the following information:
  - a. Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded,
  - b. Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded,

- c. History of degassing operations, if any, starting 48 hours prior to the first sample in which the limit was exceeded,
- d. The time duration when the specific activity of the primary coolant exceeded 1.0  $\mu\text{Ci/cc}$  DOSE EQUIVALENT I-131,
- e. Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded, and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations, and
- f. Graph of the I-131 concentration and one other radioiodine isotope concentration in  $\mu\text{Ci/cc}$  as a function of time for the duration of the specific activity above the steady-state level.

resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operations), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

2. Annual Reports<sup>1</sup>

Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions <sup>2</sup>, e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

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Note: Footnotes 1 and 2 are located on page TS 6.6-17.

- b. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.1.D.4. In addition, the information itemized in Specification 3.1.D.4 shall be included in this report.

3. Monthly Operating Report

Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the Reactor Coolant System PORV's or safety valves, shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, with a copy to the Regional Office of Inspection and Enforcement, no later than the 15th of each month following the calendar month covered by the report.

TS 6.6-4

Pages 6.6-4 through 6.6-9 have been deleted.

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**ATTACHMENT 2**

**Discussion Of Original and Supplemental Proposed Changes**

## Discussion Of Proposed Changes

### Discussion of Original Changes

As presented in letter Serial No. 88-105A, dated July 1, 1988, Specifications 3.1.D.3 and 3.1.D.4 have been revised as allowed by Generic Letter 85-19, "Reporting Requirements on Primary Coolant Iodine Spikes." The Generic Letter states that licensees may eliminate the existing requirement to shut down a plant if coolant iodine activity limits are exceeded for 800 hours in a 12 month period. No corresponding shutdown requirement exists in the Surry Technical Specifications. However, Specification 3.1.D.3 currently requires that a Special Report be submitted if coolant iodine activity limits are exceeded for 300 hours in a 6 month period. Because the Generic Letter also states that the reporting requirements for iodine spiking can be reduced from a short-term report (i.e., License Event Report or Special Report) to an item which is included in an annual report, a portion of Specification 3.1.D.3 has been eliminated with the appropriate reporting requirement now fulfilled under Specification 6.6.A.3. Because Surry does not submit an annual report on specific activity events, it was originally proposed to incorporate the iodine spiking information in the Monthly Operating Report (Specification 6.6.A.3).

In accordance with the Generic Letter, the information regarding fuel burnup by core region has also been deleted from Specification 3.1.D.4.

As discussed in the Generic Letter, the quality of nuclear fuel has been greatly improved over the past decade with the result that coolant iodine activity is normally well below the Technical Specification limit. In addition, 10 CFR 50.72 (b)(1)(ii) requires the licensee to immediately notify the NRC if fuel cladding failures exceed expected values or are caused by unexpected factors. Thus, the 300 hour limit is no longer considered necessary on the basis that proper fuel management and existing reporting requirements should preclude ever approaching the limit.

### Discussion of Supplemental Changes

Subsequent to the issuance of letter Serial No. 88-105A, it was discovered that two additional reporting criteria (items e. and f. on enclosed page TS 3.1-15b) recommended by Generic Letter 85-19 had inadvertently been omitted in the original submittal. Additionally, it was determined that two other related reporting criteria (items c. and d. enclosed on page TS 3.1-15b) had been inadvertently deleted from the NRC authority copy of the Surry Technical Specifications during processing of an earlier licensing amendment request.

The inadvertent deletion of two reporting criteria appears to have been an isolated incident initiated by the Company in retyping Technical Specification page TS 3.1-15a to revise the formatting of one paragraph following issuance of Amendment 76/77 on March 25, 1982. In the process of retyping the page, the two subject reporting criteria were moved to a new page, TS 3.1-15b. This new page did not appear in the NRC authority copy of the Technical Specifications. Subsequently, the NRC issued Amendment 104/104 on December 11, 1985, which included changes to page TS 3.1-15a. Inasmuch as the two subject reporting criteria were not presented on that page in the proposed change, it was not recognized that they had been relocated to a new page; the net effect was to unintentionally remove the two requirements from the NRC

authority copy. However, these two reporting criteria continued to be maintained in Company copies of the Technical Specifications as reporting requirements.

The supplemental proposed change corrects this discrepancy by formally adding page TS 3.1-15b, including both the two previously deleted reporting criteria and the two criteria from Generic Letter 85-19 which had been inadvertently omitted.

As indicated in the Discussion of Original Changes, the original submittal via letter Serial No. 88-105A proposed the Monthly Operating Report as the reporting document to include the iodine spiking information. The NRC has subsequently advised us that the Monthly Operating Report is not an appropriate document for submitting this information. Therefore, Specification 6.6.A.2 has been revised to include an annual report, in which the specific activity events will be reported. This supplemental proposed change is consistent with Generic Letter 85-19.

Along with this supplemental proposed change regarding the reporting document, the following editorial changes have been made in Specification 6.6.A:

1. The title of Specification 6.6.A.2 was revised from Annual Operating Report to Annual Reports, consistent with the Standardized Technical Specifications.
2. The introductory words "Reports required on an annual basis shall include:" have been added to Specification 6.6.A.2.
3. Item 2.(1) has been renumbered as Item 2.a. for consistency with the numbering scheme elsewhere in Specification 6.6.
4. A note was added to page TS 6.6-2 indicating that Footnotes 1 and 2 are located on page TS 6.6-17.
5. The text of Specifications 6.6.A.2 and 6.6.A.3 has been shifted from page TS 6.6-4 to pages TS 6.6-2 and 6.6-3 for ease in reading. Therefore, page TS 6.6-4 is no longer necessary and is identified as a deleted page.

## **Basis For No Significant Hazards Determination**

The proposed changes do not involve a significant hazards consideration because operation of Surry Units 1 & 2 in accordance with these changes would not:

- (1) involve a significant increase in the probability or consequence of an accident previously evaluated. The changes involve administrative changes specified in Generic Letter 85-19. The deletion of the requirement to submit a Special Report if the coolant activity limit is exceeded for more than 300 hours in any 6 month period is not considered necessary because of the increased quality of nuclear fuel production and management and the requirement of 10 CFR 50.72 (b)(1)(ii) for immediate notification if fuel clad failures exceed expected values should preclude approaching the limit.
- (2) create the possibility of a new or different kind of accident from any accident previously identified. The changes involve administrative changes specified in Generic Letter 85-19. The deletion of the requirement to submit a Special Report if the coolant activity limit is exceeded for more than 300 hours in any 6 month period is not considered necessary because of the increased quality of nuclear fuel production and management and the requirement of 10 CFR 50.72 (b)(1)(ii) for immediate notification if fuel clad failures exceed expected values should preclude approaching the limit.
- (3) involve a significant reduction in a margin of safety. The changes involve administrative changes specified in Generic Letter 85-19. The deletion of the requirement to submit a Special Report if the coolant activity limit is exceeded for more than 300 hours in any 6 month period is not considered necessary because of the increased quality of nuclear fuel production and management and the requirement of 10 CFR 50.72 (b)(1)(ii) for immediate notification if fuel clad failures exceed expected values should preclude approaching the limit.

Therefore, pursuant to 10 CFR 50.92, based on the above consideration, it has been determined that this change does not involve a significant safety hazards consideration.