

**ATTACHMENT 1**  
**SURRY POWER STATION**  
**PROPOSED TECHNICAL SPECIFICATION CHANGE**  
**OFFSITE COMMITTEE REVIEW FUNCTION**

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## DISCUSSION OF CHANGE

Virginia Electric and Power Company has established an offsite management review group in addition to the Independent Review Group that assesses and makes recommendations for the safe overall operation of our nuclear stations. The committee has been functioning for several months. We are proposing that the Technical Specification review and audit function requirements be performed by our Management Safety Review Committee (MSRC) replacing the Independent Review Group. This change will put our review and audit process in line with standard technical specifications; remove the responsibility for the overall review of station activities from staff personnel; and increase senior company management's involvement in the review and assessment of the nuclear plant activities. The Independent Review Group is not being dissolved but will be utilized by the MSRC to perform reviews and assessments of plant activities.

The proposed Technical Specification change will eliminate Sections 6.1.C.2-Independent Operational Event Review Group and 6.1.C.3 - Quality Assurance Audits in the existing Technical Specifications. These sections will be replaced with the appropriate Standard Technical Specification requirements for the offsite safety review and audit function (i.e., STS Section 6.5.2 - Company Nuclear Review and Audit Group). The following differences exist between the existing Surry Technical Specification and the proposed Technical Specification:

- The offsite review function will now be the responsibility of the MSRC. The majority of the reviews will be performed by a subcommittee of qualified staff specialists and the results reported to the committee.
- Section 6.1.C.2.a, Function - The list of areas and activities to be reviewed by the MSRC is being updated to more closely parallel plant and engineering activities.
- Section 6.1.C.2.g, Reviews - The existing Technical Specifications contain a requirement for the IOER staff to review the Quality Assurance audit program once per 12 months. This requirement was incorporated into our existing TS because the QA Department is responsible for the TS required audits. This requirement provided the necessary interface for the two groups. These

same Technical Specification required audits will now be performed under the cognizance of the MSRC which will provide the required interface with the group performing the audit (most likely the QA Department).

- Section 6.1.C.2.h, Quality Assurance Department - The Quality Assurance Department is currently responsible for the Technical Specification required audits. In the proposed Technical Specification change the MSRC is required to have the audits performed under their cognizance. The MSRC will have an input to the audit schedule, the program attributes and activities audited. Most of these audits will be performed by the Quality Assurance Department and the results reported to MSRC. Three audits in the existing Technical Specification are not included in the Standard Technical Specification list of required audits. These three audits: 1) the radiological environmental monitoring program, 2) the Offsite Dose Calculation Manual, and 3) the Process Control Program and radwaste procedures will remain in the Technical Specification to meet previous commitments.
- Section 6.1.C.2.j.1, Records - The requirement to prepare, approve, and forward MSRC minutes to the Senior Vice President - Nuclear within 14 days of each meeting is being revised to require the minutes to be prepared, approved and forwarded to the Senior Vice President - Nuclear prior to the next regularly scheduled meeting. Safety significant findings are reported to the Senior Vice President - Nuclear within 14 days as required by Section 6.1.C.2.j.2

To clarify that the Vice-Chairman can act as a voting member when the Chairman is presiding over a SNSOC meeting, Section 6.1.C.1.b, Composition of SNSOC, is being modified to include the Vice-Chairman as a member.

In addition to the above, this proposed Technical Specification change deletes or modifies the titles, as necessary to reflect a recent organizational change. The changes are as follows:

- The Senior Vice President -Power title has changed to Senior Vice President - Nuclear. This change is in Sections 6.1, and 6.2.
- The Vice President -Nuclear title has changed to Vice President - Nuclear Operations. This change is throughout Section 6.1, 6.2 and 6.3
- The Superintendent - Technical Services position had been eliminated. These functions have been charged to the Superintendent of Maintenance and Superintendent of Engineering. Therefore that position is being eliminated from the membership of SNSOC (Section 6.1.C.1.b).
- The Superintendent - Health Physics title has changed to Superintendent - Radiological Protection (Section 6.1.C.1.b).
- The Safety Evaluation and Control Staff (SEC) has been eliminated. Therefore the SEC has been eliminated in Section 6.1.B.3. and replaced with the operating experience program,
- Training is now the functional responsibility of the Manager - Nuclear Training and has been changed to reflect that in section 6.1.B.3

6.0 ADMINISTRATIVE CONTROLS6.1 Organization, Safety and Operation Review Specification

- A. The Station Manager shall be responsible for the overall operation of the facility. In his absence, the Assistant Station Manager (Operations and Maintenance) shall be responsible for the safe operation of the facility. During the absence of both, the Station Manager will delegate in writing the succession to this responsibility.

An onsite and an offsite organization shall be established for facility operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the UFSAR.
  2. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
  3. The Vice President-Nuclear Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
  4. The management position responsible for training of the operating staff and the position responsible for the quality assurance functions shall have sufficient organizational freedom including sufficient independence from cost and schedule when opposed to safety considerations.
  5. The management position responsible for health physics shall have direct access to that onsite individual having responsibility for overall facility management. Health Physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.
- B. The facility organization shall conform to the following requirements:
1. Each member of the facility staff shall meet or exceed the minimum qualifications of ANS 3.1 (12/79 Draft)\* for comparable positions, and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for the Superintendent-Radiological Protection who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

\* Exceptions to this requirement are specified in VEPCO's QA Topical Report, VEP-1, "Quality Assurance Program, Operations Phase."

2. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents.
3. The Manager - Nuclear Training is responsible for ensuring that retraining and replacement training programs for the facility staff are maintained and that such programs meet or exceed the requirements and recommendations of Section 5.5 of ANS 3.1 (12/79 Draft)\* and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the operating experience program.
4. Each on-duty shift shall be composed of at least the minimum shift crew composition for each unit as shown in Table 6.1-1.
5. A health physics technician shall be on site when fuel is in the reactor.
6. All core alterations shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

\* Exceptions to this requirement are specified in VEPCO's QA Topical Report, VEP-1, "Quality Assurance Program, Operations Phase."

- C. Organization units to provide a continuing review of the operational and safety aspects of the nuclear facility shall be constituted and have the authority and responsibilities outlined below:

1. Station Nuclear Safety and Operating Committee (SNSOC)

a. Function

The SNSOC shall function to advise the Station Manager on all matters related to nuclear safety.

b. Composition

The SNSOC shall be composed of the:

Chairman: Assistant Station Manager, Nuclear Safety  
and Licensing

Vice Chairman and Member: Assistant Station Manager, Operations and  
Maintenance

Member: Superintendent - Operations

Member: Superintendent - Maintenance

Member: Superintendent - Radiological Protection

Member: Superintendent - Engineering

c. Alternates

All alternate members shall be appointed in writing however, no more than two alternates shall participate as voting members in SNSOC activities at any one time.

d. Meeting Frequency

The SNSOC shall meet at least once per calendar month and as convened by the SNSOC Chairman or his designated alternate.

e. Quorum

A quorum of the SNSOC shall consist of the Chairman or Vice Chairman and two members including alternates.

## f. Responsibilities

The SNSOC shall be responsible for:

1. Review of a) all proposed normal, abnormal, and emergency operating procedures and all proposed maintenance procedures and changes thereto, b) any other proposed procedures or changes thereto as determined by the Station Manager which affect nuclear safety.
2. Review of all proposed test and experiment procedures that affect nuclear safety.
3. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
4. Review of proposed changes to Technical Specifications and shall submit recommended changes to the Station Manager.
5. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President - Nuclear Operations and to the Management Safety Review Committee.
6. Review of all Reportable Events and special reports submitted to the NRC.
7. Review of facility operations to detect potential nuclear safety hazards.
8. Performance of special reviews, investigations or analyses and report thereon as requested by the Chairman of the SNSOC or Station Manager.

9. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Station Manager.
10. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Station Manager.
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.

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 an Assistant Station Manager.
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 Station Manager; however, the Station Manager 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.

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## 2. MANAGEMENT SAFETY REVIEW COMMITTEE (MSRC)

### a. Function

The Management Safety Review Committee shall function to provide independent review and audit of designated activities in the areas of:

1. Station Operations
2. Maintenance
3. Reactivity Management
4. Engineering
5. Chemistry and Radiochemistry
6. Radiological Safety
7. Quality Assurance Practices
8. Emergency Preparedness

### b. Composition

The MSRC shall be composed of the MSRC Chairman and a minimum of four MSRC members. The Chairman and all members of the MSRC shall have qualifications that meet the requirements of Section 4.7 of ANS 3.1-(12/1979 Draft)

### c. Alternates

All alternate members shall be appointed in writing by the MSRC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in MSRC activities at any one time.

### d. Consultants

Consultants should be utilized as determined by the MSRC Chairman to provide expert advice to the MSRC.

## e. Meeting Frequency

The MSRC shall meet at least once per calendar quarter.

## f. Quorum

The minimum quorum of the MSRC necessary for the performance of the MSRC review and audit functions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least 4 MSRC members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

## g. Review

The MSRC shall be responsible for the review of:

1. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
2. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
3. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
4. Proposed changes to Technical Specifications or the Operating Licenses.

5. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
6. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.
7. Events requiring written notification to the Commission.
8. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
9. Reports and meeting minutes of the SNSOC.

h. Audits

Audits of facility activities shall be performed under the cognizance of the MSRC. These audits shall encompass:

1. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
2. The performance, training and qualifications of the entire facility staff at least once per 12 months.
3. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.

4. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
5. The Emergency Plan and implementing procedures at least once per 12 months.
6. The Security Plan and implementing procedures at least once per 12 months.
7. Any other area of facility operation considered appropriate by the MSRC or the Vice President - Nuclear Operations.
8. The Fire Protection Program and implementing procedures at least once per 24 months.
9. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
10. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
11. The radiological environmental monitoring program at least once per 12 months.
12. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.
13. The Process Control Program and implementing procedures for processing and packaging of radioactive waste at least once per 24 months.

## i. Authority

The MSRC shall report to and advise the Senior Vice President - Nuclear on those areas of responsibility specified in Sections 6.1.c.2.g and 6.1.c.2.h.

## j. Records

Records of MSRC activities shall be prepared, approved and distributed as indicated below:

1. Minutes of each MSRC meeting shall be prepared, approved and forwarded to the Senior Vice President - Nuclear prior to the next regularly scheduled meeting.
2. Reports of reviews with safety significant findings encompassed by Section 6.1.c.2.g above, shall be prepared, approved and forwarded to the Senior Vice President - Nuclear within 14 days following completion of the review.
3. Audit reports encompassed by Section 6.1.c.2.h above, shall be forwarded to the Senior Vice President - Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

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## 6.2 GENERAL NOTIFICATION AND REPORTING REQUIREMENTS

### Specification

- A. The following actions shall be taken for Reportable Events:
1. A report shall be submitted pursuant to the requirements of Section 50.73 to 10 CFR, and
  2. Each Reportable Event shall be reviewed by the SNSOC. The Vice President - Nuclear Operations and the MSRC shall be notified of the results of this review.
- B. Immediate notifications shall be made in accordance with Section 50.72 to 10 CFR.

6.3 ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDEDSpecification

- A. The following actions shall be taken in the event a Safety Limit is violated:
1. The facility shall be placed in at least hot shutdown within 1 hour.
  2. The Safety Limit violation shall be reported to the Commission, the Vice President - Nuclear Operations, and the MSRC within 24 hours.
  3. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSOC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
  4. The Safety Limit Violation Report shall be submitted to the Commission, the Vice President - Nuclear Operations, and the MSRC within 14 days of the violation.

**ATTACHMENT 2**  
**SURRY POWER STATION**  
**SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION**

## **SIGNIFICANT HAZARDS CONSIDERATION**

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, the proposed Technical Specifications change only replaces the offsite staff review with a management review committee bringing the Surry Technical Specification in line with the Standard Technical Specifications. Thus, 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 any accident or malfunction of equipment which is important to safety and which has been evaluated in the UFSAR. This modification is of an organizational nature and has no impact on plant design or operation. No plant equipment or operational procedures are being modified.
2. Create the possibility of a new or different type of accident from those previously evaluated in the safety analysis report. The organizational and plant activities review changes have no impact on plant design or operation and in no way impact the accidents previously analyzed in the safety analysis report. Therefore no new or different kind of accident is created.
3. Involve a significant reduction in the margin of safety. No physical plant modifications, changes in plant operations, or changes in accident analysis assumptions are being made. Therefore, the accident analysis assumptions remain bounding and safety margins remain unchanged.