

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

March 14, 1990

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

Serial No. 90-124
NO/ETSR-3
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
FUNCTIONAL TEST OF HIGH SETPOINT
FOR POWER OPERATED RELIEF VALVES

In support of the interim Technical Specification change on pressurizer safety valve setpoint tolerance, we committed to provide compensatory measures. These compensatory measures include the operability of one of two Power Operated Relief Valves (PORVs) and the turbine trip-reactor trip anticipatory circuit. Either compensatory measure in conjunction with the higher pressurizer safety valve lift setpoint is sufficient to limit any expected pressure transient to below Code requirements.

The Safety Evaluation Report (SER) for the Emergency Technical Specification change for Pressurizer Safety Valves, issued on November 16, 1989, was discussed during a telephone conversation on March 9, 1990 with the NRC staff. The SER requires both compensatory measures to be in place, but does not specifically identify operability testing requirements other than those implied by normal Technical Specification required testing. It was brought to our attention that the SER was granted under the assumption that the operability of the PORVs is being established by performing a monthly functional test of the PORV circuitry that includes the "high" setpoint.

Surry Technical Specifications require a channel calibration on a refueling basis and a channel functional test every 31 days. The Technical Specification channel functional testing requirement was interpreted to test the protection function of the valves. The protection functions of the PORV are: 1) to prevent overpressurization of the Reactor Coolant System at low temperatures, and 2) to ensure PORV closure following a pressure transient at operating pressure and temperature for inventory control. Accordingly, the low temperature PORV setpoints, as well as the pressurizer

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pressure channel inputs to the 2000 psi PORV interlock, have been routinely tested. Until the generic issue on pressurizer safety valves was identified, credit was not taken in the safety analysis for the automatic operation of a PORV for any analyzed accident initiating at normal plant operating temperature and pressure. Therefore, the open setpoint (high setpoint), which is considered a control function, was not included in the monthly channel functional test.

We agree that the compensatory measure requiring operability of at least one PORV should include a channel functional test of the "high" setpoint. Therefore, in a second March 9 telephone conversation with the NRC staff, we committed to prepare and perform a channel functional test of the PORV "high" setpoint. This functional test was satisfactorily performed on March 9, 1990 for each PORV. In addition, we committed to continue to perform the "high" setpoint test on a thirty-one day basis, as long as PORV operability was necessary to support the Pressurizer Safety Valve Interim Technical Specification.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

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