ATTACHMENT 1

SURRY POWER STATION UNIT 2
10CFR50 APPENDIX J TYPE C TESTING
TECHNICAL SPECIFICATION CHANGE

DISCUSSION

10 CFR 50, Appendix J requires that Type C tests be performed "each reactor shutdown for refueling but in no case at intervals greater than 2 years." At Surry Power Station, this interval requirement has been interpreted to initiate at the completion of the Type C periodic test procedure which tests every valve which falls under the purview of the rule. The two year interval requirement has not been previously interpreted as applying individually to each valve.

BACKGROUND

In letters dated January 8, March 20 and April 20, 1990, we requested and were granted an extension for Surry Unit 1 to perform local leak rate testing at the Cycle 10 refueling outage scheduled for October 1990. A Unit 2 extension request was not requested at that time based on our interpretation that the two year inspection interval was initiated at the end of the overall Type C periodic test rather than applied individually to each valve. We were not aware of any specific NRC guidance which had been issued as to application of the inspection interval to individual valves.

Surry Unit 2 was shutdown for refueling on September 10, 1988. Local Leak Rate Testing (Type C testing) commenced in September 1988 and was completed in September 1989. Due to the extended refueling and maintenance outage, the next refueling outage is currently scheduled for the second quarter 1991. The interval between the refueling outages will exceed the two year requirement of Appendix J for the valves tested early in the extended outage. As stated in 10 CFR 50, Appendix J, Section III. D.3, local leak rate testing shall be performed during reactor shutdowns for refueling but in no case at an interval greater than two years. Therefore, an exemption to this Appendix J requirement in the form of a one-time extension of the interval has been requested. This Technical Specification will provide a footnote to identify the exemption and eliminate any potential confusion about the testing interval.

Per the exemption request, the test interval would be extended approximately 9 months if June 30, 1991 is used for the exemption. The actual in-service period during power operation for the containment isolation valves, including the projected seven months until the Surry Unit 2 outage, will be less than the two-year maximum allowable interval. The remaining calendar time between component testing will have occurred during periods of cold shutdown which can be generally considered to be less severe service conditions than power operations.

There are a total of 122 containment isolation valves and 63 penetrations. The exemption is required for 76 valves associated with 42 penetrations.

b. The leakage rate test will be performed at a pressure of at least 39.2 psig (P_a).

c. The measured leakage rate L_{am} shall not exceed 75% of the design basis accident leakage rate (L_a) of 0.1 weight percent per 24 hours at pressure P_a.

2. Type B and C tests will be performed at a pressure of at least 39.2 psig (P_a) in accordance with the provisions of Appendix J, Section III.B and C.*† Also, within 72 hours after use of the personnel airlock, the seals will be tested at least at the peak calculated accident pressure to verify that they are properly sealed.

C. Acceptance Criteria

Type A, B, and C tests will be considered to be satisfactory if the acceptance criteria delineated in Appendix J, Sections III.A.5(b), III.B.3, and III.C.3 are met.

D. Retest Schedule

The retest schedules for Type A, B, and C tests will be in accordance with Section III.D of Appendix J.*†

E. Inspection and Reporting of Tests

Inspection and reporting of tests will be in accordance with Section V of Appendix J.

* Type C testing for Unit 1 can be deferred beyond the 2 year Appendix J requirement until the end of Operating Cycle 10 but the deferral shall expire no later than December 31, 1990 in accordance with the NRC exemption received on June 22, 1990.

† Type C testing for Unit 2 can be deferred beyond the 2 year Appendix J requirement until the end of Operating Cycle 10 but the deferral shall expire no later than June 30, 1991 in accordance with the NRC exemption received on _____1990.

ATTACHMENT 2

SIGNIFICANT HAZARDS CONSIDERATION EVALUATON

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 change clarifies the Technical Specifications to reflect the exemption request which would provide a one-time extension of the two-year period for Appendix J LLRT testing requirement. 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 because extending the LLRTs does not affect the probability of occurrence of accidents, nor does projected degradation of equipment occur that would change the consequences of an accident.

2. Create the possibility of a new or different type of accident from those previously evaluated in the safety analysis report. Physical plant modifications are not being made and plant operations are not being changed. Consequently the systems' ability to perform its intended function will be maintained, no new accident precursors are being generated and therefore no new or different kind of accident is created.

3. Involve a significant reduction in the margin of safety. Plant operations are not being changed nor are any of the accident analysis assumptions being modified or exceeded by this change. The deferral of the LLRTs will not result in significant degradation of equipment in that the equipment will be in service for about the same time as a normal 18 month operating cycle. The projected leakage rate (92 SCFH) is well below the 0.6 La (180 SCFH) acceptance criterion. Therefore, the accident analysis assumptions remain bounding and safety margins remain unchanged.