

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

September 20, 1991

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

Serial No. 91-478
NL/RPC R1
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 CHANGE
OPPOSITE TRAIN SURVEILLANCE TESTING REQUIREMENTS

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company requests an amendment, in the form of changes to the Technical Specifications, to Operating License Nos. DPR-32 and DPR-37 for Surry Power Station Units 1 and 2. This submittal addresses the commitment stated in our letter (Serial No. 91-467) dated August 9, 1991.

In recent discussions with the NRC staff concerning operability determinations, several instances in the Surry Technical Specifications were identified where the required actions to perform a surveillance could, in conjunction with opposite train testing requirements, render the entire safety system inoperable while the surveillance test is performed. For these examples, if a train of safety equipment becomes inoperable due to the performance of a surveillance test, the opposite train must be tested to establish its operability prior to "repairing" the inoperable train. Based on the NRC position on the use of administrative controls, when the opposite train is tested in accordance with the Technical Specifications, the plant would have to voluntarily enter the six-hour action statement of T.S. 3.0.1 with both trains inoperable. This opposite train testing requirement is specified in the Technical Specifications for the Low Head Safety Injection System (T.S. 3.3), the Containment and Recirculation Spray Systems (T.S. 3.4), Emergency Diesel Generators (T.S. 3.16), and the Auxiliary Ventilation Exhaust Filter Trains (T.S. 3.22).

From the initial issuance of the operating license, the interpretation of Technical Specifications has been that these affected subsystems were maintained operable for the required surveillance by administrative controls. To declare them inoperable and require subsequent opposite train operability to be verified by testing could have resulted in voluntarily exceeding the Technical Specifications. Conduct of surveillances, which would result in the voluntary rendering of the entire safety system inoperable, is inconsistent with the intent of Technical Specifications, which is to ensure the ability of safety systems to perform their function. The proposed change will eliminate (or modify in the case of Emergency Diesel Generators) the additional testing requirement for the opposite train based on no common mode failure considerations and previous surveillance testing within the period having established operability of the opposite train.

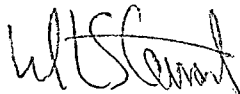
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In the case of the Emergency Diesel Generators, the proposed change would provide for a limited time to perform opposite train operability testing consistent with standard technical specification (STS) guidance. Although consistent with STS, we have determined that implementing this change at Surry represents an unreviewed safety question requiring a license amendment. However, as shown in Attachment 2, the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92.

The proposed change, which is enclosed in Attachment 1, has been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee. Should you have any questions, please do not hesitate to contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachments

1. Proposed Technical Specification Changes
2. Discussion and Significant Hazards Consideration Evaluation

cc: U. S. Nuclear Regulatory Commission
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Mr. M. W. Branch
NRC Senior Resident Inspector
Surry Power Station

Commissioner
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109 Governor Street
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COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by W. L. Stewart who is Senior Vice President - Nuclear, of Virginia Electric and Power Company. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 20TH day of September, 1991.

My Commission Expires: May 31, 1994.

Vicki L. Hull
Notary Public

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