

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

September 8, 1992

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Serial No. 92-482  
NL&P/MAE: R10  
Docket Nos. 50-280  
50-281  
50-338  
50-339  
License Nos. DPR-32  
DPR-37  
NPF-4  
NPF-7

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENTS**

As discussed in our May 14, 1992, letter (Serial No. 92-281), a Management Surveillance Task Team has been established due to the identification of Technical Specification surveillance requirements which were not fully met. The task team was organized to review the Technical Specification surveillance program and identify any actions necessary to ensure full compliance with the Technical Specifications at both North Anna and Surry Power Stations. They have recommended that a complete review of surveillance requirements be conducted at both stations. These reviews have begun and are currently scheduled to be completed by June 1993 at North Anna and October 1993 at Surry. Should the schedule need to be modified, the appropriate Resident Inspector will be notified. The reviews will be performed by a review team that will include SRO and/or STA-qualified engineers.

Each station's review involves a line-by-line examination of Technical Specification surveillance requirements. The primary goal of this review is to verify that Technical Specification surveillance requirements are completely addressed by our station procedures. The scope of the review includes procedures that demonstrate operability, maintain system lineups, or implement channel functional tests or calibrations. Each individual procedure will be reviewed in detail to ensure it fully meets the Technical Specification surveillance requirement(s). For example, procedures that implement channel functional tests will be reviewed to ensure that affected circuits are tested by injecting a simulated signal as close to the sensor as practicable and verifying operability, including alarm and/or trip functions. Similarly, a review will be performed for other parameters listed in various surveillance requirements, such as temperature, pressure and flowrate.

Action plans will be developed for the review of the various Technical Specification

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sections. These plans will be developed by the review teams and will address the items discussed in Attachment 1. The methodology for the surveillance reviews is discussed in Attachment 2. The methodology will ensure a thorough review of the surveillance requirements.

The results of this effort will be maintained in a data base that will augment the existing Technical Specification surveillance cross-reference document. The purpose of this document is to specify the procedures that are required to satisfy each surveillance requirement. The data base will be maintained and available to station personnel to help ensure that the Technical Specification surveillance requirements continue to be met.

During the course of the review, surveillance requirements not fully implemented by existing procedures may be identified. Those instances will be handled in accordance with Technical Specification requirements and reported consistent with 10CFR50.72 or 50.73. As recently discussed between Mr. P. E. Frederickson and Mr. M. L. Bowling, we will be establishing categories of deficiencies and submitting combined reports, where applicable, for the duration of this review period.

Several issues identified during our review to date have been reported. These issues have not affected the ability of the systems or components to perform their intended functions. For example, a small portion of the undervoltage/degraded voltage trip circuitry was not being tested for several components. Subsequent testing of the circuits demonstrated that they were capable of performing their intended functions or corrective actions were initiated. Based on the experience to date, we do not expect to find major discrepancies during the remainder of this review.

The review discussed above will refine our existing program to ensure that surveillance requirements have been fully addressed. Other ongoing activities, such as the procedures upgrade program and the annual Technical Specification/Licensing Requirements audit conducted by our Quality Assurance group, also provide a high degree of assurance that surveillance requirements continue to be met. In the event that a discrepancy is found during the performance of these activities during the review time frame, it will also be reported as described above.

If you have any questions or require additional information, please contact us.

Very truly yours,



W. L. Stewart  
Senior Vice President - Nuclear

Attachments

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

Mr. M. S. Lesser  
NRC Senior Resident Inspector  
North Anna Power Station

## **ATTACHMENT 1**

### **REVIEWER PREPARATION**

In preparation for the review of various sections of the Technical Specifications, members of the review team from each Station will meet to develop section-specific action plans as needed. Aspects that will be addressed by the reviewers include:

1. Identification of pertinent questions that need to be addressed as each section is reviewed.
2. Development of a list of reference documents and drawings that will be used to support the review. These references may include the Design Basis Document and the Updated Final Safety Analysis Report, as well as applicable industry standards (e.g., ASME, IEEE) and guidelines from the NRC and INPO.
3. Identification of unique applications or conditions at the four units that may necessitate differences in the format of the review.
4. Development of an outline for the review process of Technical Specification sections, as needed. This outline will be discussed with the Technical Specification review coordinator (Supervisor or above) at each Station.

## ATTACHMENT 2

### REVIEW METHODOLOGY

Surveillance reviews will use the following approach:

1. The results of previous surveillance reviews, and the Periodic Test (PT) Cross-reference will not be relied upon to be complete. All Technical Specification surveillances will be reexamined during this project to confirm that existing procedures are complete.
2. The review will ensure that the entire instrumentation loop or system actuation is tested in accordance with Technical Specifications requirements. Where applicable, compliance with ASME and IEEE standards will be addressed. The review will utilize controlled station drawings. All possible logic paths for final equipment actuation will be reviewed to ensure proper testing. Surveillances for all flow paths, including pump and valve actuation required for accident mitigation, will be verified. Equipment redundancy and operability requirements will be examined.
3. For instrumentation channels which have various portions that are tested by different surveillance procedures, proper overlap of the PT's will be verified. Documentation will be developed to clearly show the overlap.
4. Surveillance procedures will be reviewed to identify parameters that are used to determine operability for Technical Specification related equipment. The Review Team will ensure that these critical parameters are calibrated/checked at a set frequency by a station procedure. For example, if the emergency diesel generator surveillance procedure records oil temperature and its limits are identified in the acceptance criteria of the procedure to satisfy a Technical Specification surveillance requirement, then the oil temperature indicator needs to be checked or calibrated by a station procedure or program.
5. Background information from the Technical Specifications Bases, the Updated Final Safety Analysis Report, and the Design Basis Documents will be used to assure a complete review of the surveillance requirements.
6. The completeness of the surveillance review will be ensured by including all channels of both instrumentation trains for both units. This is particularly important for North Anna since the surveillance requirements vary between the units.
7. The Technical Specifications surveillance documentation will be independently prepared and reviewed by two individuals having similar qualifications. Final approval will be provided by the Technical Specification Review Coordinator.
8. After the surveillance review project is completed, the responsibility for maintaining the accuracy and completeness of the database will be transferred to a qualified individual within the Station Engineering organization.