

ATTACHMENT 1
SURRY POWER STATION
PROPOSED TECHNICAL SPECIFICATION CHANGES

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when the Health Physics Coordinator for the Steam Generator Repair Program determines, based on an evaluation involving ALARA considerations, that their use will increase overall occupational radiation exposure to workers involved in the repair activities.

- (c) The health physics program and procedures which have been established for the steam generator repair program shall be implemented.
 - (d) Progress reports shall be provided at 60 day intervals from the start of the repair program and due 30 days after close of the interval with a final report provided within 60 days after completion of the repair. These reports will include:
 - (i) A summary of the occupational exposure expended to date using the format and detail of Table 5.3-1 of the report entitled "Steam Generator Repair Program."
 - (ii) An evaluation of the effectiveness of dose reduction techniques as specified in Chapter 6 of the report entitled "Steam Generator Repair Programs" in reducing occupational exposures.
 - (iii) An estimate of radioactivity released in both liquid and gaseous effluents.
 - (iv) An estimate of the solid radioactive waste generated during the repair effort including volume and radioactive content.
 - (3) Sixty days prior to fuel loading, the program for preoperational testing and startup shall be submitted for NRC review.
- H. The licensee shall maintain in effect and fully implement all provisions of the Commission-approved physical security plan, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p). The approved security plan consists of documents withheld from public disclosure pursuant to 10 CFR 2.790(d), referred to as Surry Power Station Unit Nos. 1 and 2 Physical Security Plan, dated November 30, 1977, as revised September 25, 1978, supplemented (Chapter 10) October 25, 1978, revised January 12, 1979, and supplemented February 16, 1979.

- I. The licensee shall implement and maintain in effect the provisions of the approved fire protection program as described in the Updated Final Safety Analysis Report and as approved in the SER dated September 19, 1979, and supplements thereto subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- J. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Surry Power Station Physical Security Plan," with revisions submitted through February 24, 1988; "Surry Power Station Guard Training and Qualification Plan," with revisions submitted through May 29, 1987; and "Surry Power Station Safeguards Contingency Plan," with revisions submitted through January 9, 1987. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

K. Secondary Water Chemistry Monitoring Program

The licensee shall implement a secondary water chemistry monitoring program to inhibit steam generator tube degradation. This program shall include:

1. Identification of a sampling schedule for the critical parameters and control points for these parameters;
2. Identification of the procedures used to quantify parameters that are critical to control points;
3. Identification of process sampling points;
4. Procedure for the recording and management of data;
5. Procedures defining corrective actions for off control point chemistry conditions; and
6. A procedure for identifying the authority responsible for the interpretation of the data, and the sequence and timing of administrative events required to initiate corrective action.

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7. DELETED
8. DELETED
9. The health physics technician requirement of Specification 6.1.B.5 may not be met for a period of time not to exceed 2 hours in order to accommodate an unexpected absence provided immediate action is taken to fill the required position.
10. Procedures will be established to insure that NRC policy statement guidelines regarding working hours established for employees are followed. In addition, procedures will provide for documentation of authorized deviations from those guidelines and that the documentation is available for NRC review.

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.
13. Review of the Fire Protection Program and implementing procedures and shall submit recommended changes to the Station Manager.

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.

ATTACHMENT 2
SURRY POWER STATION
DISCUSSION OF PROPOSED CHANGES AND
SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

DISCUSSION OF CHANGE

INTRODUCTION

Pursuant to NRC guidance, the proposed Technical Specification changes remove the fire protection requirements from the Technical Specifications for relocation to the Updated Final Safety Analysis Report (UFSAR). A revised license condition is also proposed for incorporation into the Operating License for each Unit which addresses adherence and changes to the Fire Protection Program.

BACKGROUND

Generic Letter 86-10, "Implementation of Fire Protection Requirements," Section F, requested that licensees incorporate their Fire Protection Programs into their UFSAR. Upon completion of this effort, the licensees were requested to apply for an amendment to 1) replace current licensing conditions regarding fire protection with a new standard condition, and 2) remove unnecessary fire protection Technical Specifications. Generic Letter 88-12, "Removal of Fire Protection Requirements From Technical Specifications," provided additional guidance for the preparation of a license amendment request to implement Generic Letter 86-10. The proposed changes have been developed in accordance with the guidance contained in the Generic Letters and are consistent with NRC and industry efforts to simplify the Technical Specifications.

A new section has been created in the UFSAR (16.2) to contain the fire protection requirements currently contained in the Technical Specifications. Information previously contained in the Technical Specification Bases is also included in this section. No changes have been made to the technical content of the fire protection requirements being relocated to the UFSAR pursuant to the direction of Generic Letter 88-12.

Compliance with the fire protection requirements will be assured by maintaining these requirements in the UFSAR and appropriate station procedures. The proposed changes provide flexibility in updating and maintaining the fire protection program. Since no technical changes are being made, the relocation of the fire protection program is strictly administrative in nature.

SPECIFIC CHANGES

The proposed changes to the Technical Specifications are as follows:

- Licensing Condition 3.1 will be deleted in the Operating Licenses for Units 1 and 2 and will be replaced by the NRC standard fire protection license condition provided in Generic Letter 88-12. This condition requires the licensee to maintain the fire protection program as described in the UFSAR and as approved by the NRC Safety Evaluation Report. It also notes that changes to the program are allowed without NRC approval provided they do not adversely affect the ability to achieve safe shutdown in the event of a fire.

- The Technical Specification Table of Contents will be revised to indicate that Specifications 3.21 and 4.18 have been deleted.
- Technical Specifications 3.21 and 4.18 will be deleted in their entirety. These specifications discuss the fire protection features required to prevent or mitigate a fire, and the surveillance requirements for fire protection equipment, respectively.
- Technical Specifications 6.1.B.7 and 6.1.B.8 will be deleted. These specifications provide the requirements for the onsite Fire Brigade.
- Technical Specification 6.1.B.9 will be revised to delete the reference to the Fire Brigade composition requirements.
- Technical Specification 6.1.C.1.f.13 will be added to require the Station Nuclear Safety and Operating Committee to review changes to the Fire Protection Program and implementing procedures and to submit the recommended changes to the Station Manager.

SAFETY SIGNIFICANCE

The proposed Technical Specification changes relocate the fire protection requirements from the Technical Specifications to the UFSAR and station procedures. No technical changes are being made. The Fire Protection Program requirements are being retained and remain an integral part of station operations, even though they will no longer reside in the Technical Specifications. This is an administrative change only and, as such, does not represent a safety concern.

10 CFR 50.92 EVALUATION - BASIS FOR NO SIGNIFICANT HAZARDS DETERMINATION

We have reviewed the proposed changes against the criteria of 10 CFR 50.92 and have concluded that the changes do not pose a significant safety hazards consideration as defined therein. Specifically, operation of Surry Power Station with the proposed amendment will not:

1. Involve a significant increase in either the probability of occurrence or consequences of any accident or equipment malfunction scenario that is important to safety and which has been previously evaluated in the UFSAR. The requirements of the Fire Protection Program have not been changed by the proposed amendment. Relocation of the Fire Protection Program requirements into the UFSAR and station procedures does not decrease any portion of the program. The same fire protection requirements exist as before the change.
2. Create the possibility of a new or different type of accident than those previously evaluated in the safety analysis report. The requirements of the Fire Protection Program have not been changed by the proposed amendment. This is an administrative change to relocate the Fire Protection Program requirements from the Technical Specifications to the UFSAR and station procedures. Consequently, the possibility of a new or different kind of accident from any accident previously evaluated has not been created.
3. Involve a significant reduction in a margin of safety. Implementation of the Fire Protection Program requirements is assured by the UFSAR and station procedures. Since the program is being retained intact, there is no reduction in the margin of safety.