

May 6, 1975

Note to Leo McDonough

SURVEILLANCE REQUIREMENTS - OCONEE 2 AND 3

This is in response to your inquiry of April 16, 1975. In a letter dated March 25, 1975, from A. C. Theis, Duke Power Company, to Angelo Giambusso of NRC, Duke points out that the surveillance requirements set out in the technical specifications for Oconee Nuclear Station do not have a commencement date specified. Although the technical specifications require surveillance of certain structures, systems and components be performed at specified frequencies, no date is given in the technical specifications which would indicate when the requirement would go into effect.

Duke's position is that since the technical specifications are a part of the facility operating license, the commencement date for surveillance frequencies is the date of the issuance of the facility operating license. I agree.

Surveillance requirements are a part of the Quality Assurance Program established pursuant to 10 CFR 50, Appendix B. That appendix establishes quality assurance programs for the design, construction and operation of the structures, systems and components of nuclear plants. In addition, 10 CFR 50.34 requires the Applicant to provide plans for conduct of normal operations, including maintenance, surveillance and periodic testing of structures, systems and components.

The quality assurance program prior to operation is governed in part by Regulatory Guide 1.68. The guide calls for two types of testing, i.e., preoperational and initial startup testing. Those terms are defined in Regulatory Guide 1.68 as:

"Preoperational testing as used in this guide consists of those tests conducted prior to fuel loading to demonstrate the capability of structures, systems, and components to meet safety-related performance requirements.

"Initial startup testing consists of such activities as pre-critical tests, low-power tests (including critical tests), and power-ascension tests performed after fuel loading and before commercial operation that confirm the design bases and demonstrate, where practical, that the plant is capable of withstanding the anticipated transients and postulated accidents."

7912300 007

It is significant to note that preoperational testing occurs before fuel loading and initial startup testing occurs after fuel loading but before commercial operation. It may also be noted that Regulatory Guide 1.68 does not speak in terms of surveillance requirements.

Surveillance requirements are mentioned in 10 CFR 50.34(b)(6)(iv). That section calls for "plans for conduct of normal operations including maintenance, surveillance and periodic testing of structures, systems and components." The terms surveillance, therefore, appears to be a word of art which only applies to operating reactors and commences after commercial operation.



James R. Tourtellotte  
Assistant Chief Hearing Counsel

cc:  
Frank Nolan