



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 69 TO FACILITY OPERATING LICENSE NO. DPR-32
AND AMENDMENT NO. 69 TO FACILITY OPERATING LICENSE NO. DPR-37
VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-280 AND 50-281

Introduction

Virginia Electric and Power Company (the licensee) has made applications for amendments to License Nos. DPR-32 and DPR-37 for the Surry Power Station, Unit Nos. 1 and 2. These applications are dated March 31, August 28, and November 14, 1980, as supplemented August 4, 1980 and February 23, 1981.

The proposed amendments consist of changes to the Technical Specifications which revise the Administrative Controls, Section 6. The changes reflect corporate and plant reorganization including the addition of an Assistant Station Manager, establishment of a Safety Evaluation and Control group to replace the System Nuclear Safety and Operating Committee and the addition of a Shift Technical Advisor.

Discussion and Evaluation

Technical Specifications Figure 6.1-1 has been revised to show the new structure of the offsite organization for facility management and technical support. Information provided by Figure 6.1-1 was previously provided by Figures 6.1-1 and 6.1-2. The previous positions of Senior Vice President-Power and Vice President-Power Supply and Production Operations have been deleted from the Technical Specifications. The deleted positions have been replaced by the Executive Vice President-Power, the Senior Vice President-Power Operations, and the Vice President-Nuclear Operations. All previous references to the Senior Vice President-Power and Vice President-Power Supply and Production Operations positions have been revised to reference either the Senior Vice President-Power Operations or the Vice President-Nuclear Operations positions.

As indicated by Figure 6.1-1, the Manager-Nuclear Operations and Maintenance and the Manager-Nuclear Technical Services replace the previous position of Director-Nuclear Operations. Both managers will report to the Vice President-Nuclear Operations. The Manager-Nuclear Operations and Maintenance has responsibility for the supervision of the Nuclear Station Managers. Both Nuclear Station Managers and the Director-Operation and Maintenance Services report to the Manager-Nuclear Operations and Maintenance. The Section Supervisor-Training, the Section Supervisor-Operation and Maintenance Support, and the Section Supervisor - Administrative Services will report to the Director-Operation and Maintenance Services. Reporting to the Manager-Nuclear Technical Services are the Director-Chemistry and Health Physics, the Director-Technical Analysis and Control, and the Director-Safety Evaluation and Control.

The August 28, 1980 submittal (Serial No. 732) proposed the transfer of the independent review responsibility from the existing System Nuclear Safety and Operating Committee (SyNSOC) to the Safety Evaluation and Control (SEC) staff and proposed the transfer of the System Nuclear Safety and Operating Committee audit responsibility to the Quality Assurance Department.

The Safety Evaluation and Control staff will be composed of a Director and a minimum of three staff members qualified to perform independent reviews. The Director-Safety Evaluation and Control will report to the Manager-Nuclear Technical Services, who will advise the Vice President-Nuclear Operations on the activities of the Safety Evaluation and Control staff. This organizational structure will assure that sufficient attention is directed towards examination and evaluation of safety concerns and that management is cognizant of the results of these Safety Evaluation and Control staff reviews.

The Safety Evaluation and Control staff will provide the independent reviews of station operational activities required by ANSI N18.7-1976/ANS 3.2 (Administrative Controls and Quality Assurance Program for Operational Nuclear Power Plants), which are presently provided by the System Nuclear Safety and Operating Committee. The advantages of this proposed change are threefold.

First, the Safety Evaluation and Control staff is composed of individuals with direct nuclear experience in their respective technical disciplines. Presently, Safety Evaluation and Control staff specialists meet or exceed the criteria proposed in Technical Specification 6.1.C.2.b. The proposed requirement in Specification 6.1.C.2.b exceeds the criteria for review "staff specialists" established in ANSI N18.1-1971/ANS 3.1-1978 (Standard For Selection and Training of Personnel for Nuclear Power Plants) and meets the present qualification position of the Commission. Additionally, the Director-Safety Evaluation and Control exceeds the criteria established by ANSI N18.1-1971/ANS 3.1-1978 for the Supervisor of an independent review staff. Future Safety Evaluation and Control staff members may not meet the qualification criteria for "staff specialists" positions; however, such individuals will not be directly responsible for the independent review function of Safety Evaluation and Control.

Secondly, the independent reviews of station operational activities by the Safety Evaluation and Control staff will be performed on a continuous basis as part of their routine responsibilities. This is in contrast to an intermittent or scheduled review committee approach; therefore, the Safety Evaluation and Control reviews will be responsive to station time constraints while also providing a more comprehensive review of items presently processed by the System Nuclear Safety and Operating Committee.

Finally, other Safety Evaluation and Control staff routine responsibilities require continuous review of industry-wide operational experience, technical information, and regulatory issues. This effort should maintain a high level of "state-of-the-art" expertise within Safety Evaluation and Control regarding operational activities and general industry concerns. It is anticipated that the Safety Evaluation and Control staff will provide the majority of the expertise necessary to perform independent review activities; however, technical consultants and in-house specialists will be utilized for special concerns when Safety Evaluation and Control review requires additional expertise.

As a result of this change, safety will be enhanced by the proposed transfer of independent review responsibilities from the System Nuclear Safety and Operating Committee to the Safety Evaluation and Control staff by upgrading the quality and timely processing of the independent reviews of station operational activities.

Specification 6.1.C.2.i for Surry Units No. 1 and No. 2 requires the performance of audits of station activities under the cognizance of the System Nuclear Safety and Operating Committee. As a result of this proposed change, the audit responsibilities outlined in Specification 6.1.C.3.a, which are presently being performed under the cognizance of the System Nuclear Safety and Operating Committee by the Quality Assurance Department, will be transferred to the Quality Assurance Department. Such a transfer will provide for appropriate organizational channels for the reporting of audit results, ensure the availability of appropriate technical expertise for the performance of these audits, and ensure that these audits are performed in an effective and timely manner.

As a result of the reorganization of the Licensing and Quality Assurance Department, the Licensing function has been transferred to Safety Evaluation and Control and the Quality Assurance organization has been restructured. The Executive Manager-Quality Assurance will be responsible for the quality assurance effort encompassing the areas of engineering, construction, and operational activities of both the fossil and the nuclear stations. He will also be responsible for the area of corporate emergency response planning and implementation. The Executive Manager-Quality Assurance will report to the Senior Vice President-Power Operations. The Manager-Quality Assurance, Operations will be responsible for implementing quality assurance programs which are related to the operational activities of the fossil and nuclear power stations. He will report to the Executive Manager-Quality Assurance. The Director-Quality Assurance, Nuclear Operations will be responsible for the implementation of quality assurance programs which are related to the operational activities associated with the nuclear power stations. He will report to the Manager-Quality Assurance, Operations.

The organization charts for the Appendix "A" Technical Specifications for Surry have been revised to reflect the restructuring of the Quality Assurance Department and changes to other organization titles. The previous title of Executive Manager-Licensing and Quality Assurance has been revised to Executive Manager-Quality Assurance. In addition, the positions of Manager-Quality Assurance, Operations and Director-Quality Assurance, Nuclear Operations are shown on the organization chart.

Technical Specification Figure 6.1-2 has been revised to show the new structure of the Surry Power Station organization. Figure 6.1-3, which previously provided this information, has been deleted. As explained above, the Station Manager reports to the Manager-Nuclear Operations and Maintenance. Our August 4, 1980 submittal (Serial No. 671) proposes revising Section 6.0 to add the new position of Assistant Station Manager to the Surry Power Station organization. The Assistant Station Manager will be directly responsible for the safe operation and maintenance of the power station. He will serve in a coordinating capacity to the Station Manager for the off-site activities of the Station. During the absence of the Station Manager, the Assistant Manager will act as the Station Manager. The Assistant Station Manager will also be the Vice Chairman of the Station Nuclear Safety and Operating Committee (SNSOC). The Superintendent-Operations, the Superintendent-Maintenance, and the Superintendent-Technical Services will report to the Assistant Station Manager. All three of these superintendents will remain members of the SNSOC.

The positions of Operating Supervisor and Auxiliary Operator have been eliminated from the organization chart. In addition, the position title of Assistant Control Room Operator has been revised to Control Room Operator Trainee. The positions of Maintenance Coordinator and Mechanical Supervisor have been replaced on the station organization chart by the position of Supervisor-Mechanical Maintenance. Both the Maintenance Coordinator and the Mechanical Supervisor report to the Supervisor-Mechanical Maintenance. Other title changes made to the organization chart include the change of Supervisor-Safety Engineering to Engineering Supervisor (Safety Engineering), the change of Engineering Supervisor to Engineering Supervisors to reflect the two positions of Engineering Supervisor-Performance and Tests and Engineering Supervisor-Design Changes and Projects and, the change of Training Supervisor to Supervisor-Nuclear Training. The Supervisor-Health Physics position has been shifted such that he will now report directly to the Station Manager instead of reporting to the Superintendent-Technical Services. The positions of Supervisor-Nuclear Training and Supervisor-Administrative Services will also report to the Station Manager.

An appraisal of the North Anna health physics program was conducted by the NRC office of Inspection and Enforcement during the period of May 5-16, 1980. The results of this appraisal were forwarded in a letter to Mr. J. H. Ferguson dated September 15, 1980 (Serial No. 787). One of the NRC recommendations resulting from the program review is that the Supervisor-Health Physics be added as a member of the Station Nuclear Safety and Operating Committee (SNSOC). The Supervisor-Health Physics was previously a member of the SNSOC; however, he was deleted as a required SNSOC member as a result of Proposed Technical Specification Change No. 71, which was approved and issued by the NRC as Amendment No. 53 and No. 52 for Surry Unit 1 and Unit 2 respectively.

In order to address this concern, the proposed change is to reinstate the Supervisor-Health Physics as a member of the SNSOC. Since many operations at the station involve the health physics group in some capacity, the addition of the Supervisor-Health Physics will improve the quality of SNSOC reviews by adequately appraising the impact of radiation safety on station activities.

The proposed changes to the Administrative Controls Section of the Technical Specification formalizes the licensee's new corporate and plant organization. Based on our review, we conclude that the licensee's new organization is acceptable.

We also conclude that the Safety Evaluation and Control group will provide timely processing of the independent reviews of station operational activities.

The proposed Technical Specification Changes incorporate TMI-2 Lessons Learned Category A changes, which were submitted by letter dated November 14, 1980. These changes revised the minimum shift crew manning table and incorporated requirements related to the Shift Technical Advisor.

We have reviewed the Technical Specifications regarding shift crew manning and conclude that the license has established the minimum crew staffing as delineated in NRC letter dated July 31, 1980. A Shift Technical Advisor is also added as requested by NRC letter dated July 5, 1980. We find these changes acceptable.

Environmental Consideration

We have determined that the amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendments involve an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of these amendments.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendments do not involve a significant increase in the probability or consequences of accidents previously considered and do not involve a significant decrease in a safety margin, the amendments do not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Date: May 22, 1981