



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 136 TO FACILITY OPERATING LICENSE NO. DPR-32  
AND AMENDMENT NO. 136 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

By letter dated November 14, 1989, the Virginia Electric and Power Company (the licensee) requested changes to the Technical Specifications (TS) for Surry Power Station, Units Nos. 1 and No. 2.

The proposed changes would revise TS Section 6.4.B by (1) deleting the "buddy system" requirement in order to reduce unnecessary radiation exposure; (2) deleting requirements that are duplicative of the Code of Federal Regulations (6.4.B.1.c, 6.4.B.1.d and 6.4.B.1.h); and (3) reorganizing TS 6.4.B using the format in the Standard Technical Specifications (STS).

DISCUSSION AND EVALUATION

Included in TS 6.4.B is a requirement to maintain a "buddy system" for entrance into radiation areas in excess of 1 R/hr. For this requirement, one worker maintains positive control of the locked gate regardless of whether it is opened or closed at the time while the other worker (his "buddy") performs the necessary work. The two individuals are required to maintain continuous communication by visual or verbal means during this period. Due to this requirement, two individuals are subject to radiation exposure, regardless of whether both are required to accomplish the work.

In reviewing the historical record, the licensee can find no technical bases or discussion which justifies or directs the inclusion of the "buddy system" into the Technical Specifications. With respect to the regulatory and radiation protection standards of today, the "buddy system" requirement of TS 6.4.B.1.f is inconsistent with STS and contrary to common ALARA practices. Deletion of TS 6.4.B.1.f will result in a significant reduction in man-rem exposure (approximately 9.6 man-rem per year). Therefore, the staff finds this change acceptable.

There are also administrative changes in addition to the above change: (1) the requirement for surveillance of accessible high radiation areas by Health Physics personnel (TS 6.4.B.1.c) is being deleted since it duplicates the requirements of 10 CFR 20.201; (2) the personnel indoctrination requirement of TS 6.4.B.1.d is being deleted because this indoctrination is already stipulated in 10 CFR 19.12; and (3) the fencing requirements of TS 6.4.B.1.h are subsumed by the requirements 10 CFR Part 73, and are therefore deleted. Since the requirements of TS 6.4.B.1.c, 6.4.B.1.d and 6.4.B.1.h are stipulated in the Code of Federal Regulations, their inclusion in the TS are duplicative



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There are also administrative changes in addition to the above change: (1) the requirement for surveillance of accessible high radiation areas by Health Physics personnel (TS 6.4.B.1.c) is being deleted since it duplicates the requirements of 10 CFR 20.201; (2) the personnel indoctrination requirement of TS 6.4.B.1.d is being deleted because this indoctrination is already stipulated in 10 CFR 19.12; and (3) the fencing requirements of TS 6.4.B.1.h are subsumed by the requirements 10 CFR Part 73, and are therefore deleted. Since the requirements of TS 6.4.B.1.c, 6.4.B.1.d and 6.4.B.1.h are stipulated in the Code of Federal Regulations, their inclusion in the TS are duplicative

and unnecessary. Therefore, the staff finds the deletion of these TS acceptable.

Finally, TS 6.4.B has been rewritten using a format which conforms to that used in NUREG-0452, Revision 4, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." The staff finds this change acceptable since the new format conforms to an NRC-approved document.

Based on the above, the staff finds the proposed changes, described above, to be acceptable.

#### ENVIRONMENTAL CONSIDERATION

These amendments involve a change in the installation or use of the facilities components located within the restricted areas as defined in 10 CFR Part 20. The staff has determined that these amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). These amendments also involve changes in recordkeeping, reporting or administrative procedures or requirements. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

#### CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) 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.

Dated: January 29, 1990

Principal Contributor:

B. Buckley