



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 208 TO FACILITY OPERATING LICENSE NO. DPR-32
AND AMENDMENT NO. 208 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

1.0 INTRODUCTION

On September 12, 1995, the U.S. Nuclear Regulatory Commission (NRC) approved issuance of a revision to 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors" which was subsequently published in the Federal Register on September 26, 1995, and became effective on October 26, 1995. The NRC added Option B, "Performance-Based Requirements," to allow licensees to voluntarily replace the prescriptive testing requirements of 10 CFR Part 50 Appendix J with testing requirements based on both overall performance and the performance of individual components.

By letters dated November 20, 1995, and March 14, 1996, Virginia Electric and Power Company, the licensee for Surry Power Station Units 1 and 2, applied for amendments to Facility Licenses DPR-32 and DPR-37. The proposed changes would permit implementation of 10 CFR Part 50 Appendix J, Option B. The licensee has proposed changes to the technical specifications (TS) which include a reference to Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program," dated September 1995, which specifies a method acceptable to the NRC for complying with Option B.

The March 14, 1996, letter provided clarifying information that did not change the scope of the November 20, 1995, submittal and the proposed no significant hazards consideration.

2.0 BACKGROUND

Compliance with Appendix J provides assurance that the primary containment, including those systems and components which penetrate the primary containment, do not exceed the allowable leakage rate specified in the TS and bases. The allowable leakage rate is determined so that the leakage assumed in the safety analyses is not exceeded.

On February 4, 1992, the NRC published a notice in the Federal Register (57 FR 4166) discussing a planned initiative to begin eliminating requirements

marginal to safety which impose a significant regulatory burden. 10 CFR Part 50, Appendix J, "Primary Containment Leakage Testing for Water-Cooled Power Reactors," was considered for this initiative and the staff undertook a study of possible changes to this regulation. The study examined the previous performance history of domestic containments and examined the effect on risk of a revision to the requirements of Appendix J. The results of this study are reported in NUREG-1493, "Performance-Based Leak-Test Program."

Based on the results of this study, the staff developed a performance-based approach to containment leakage rate testing. On September 12, 1995, the NRC approved issuance of this revision to 10 CFR Part 50, Appendix J, which was subsequently published in the Federal Register on September 26, 1995, and became effective on October 26, 1995. The revision added Option B, "Performance-Based Requirements," to Appendix J to allow licensees to voluntarily replace the prescriptive testing requirements of Appendix J with testing requirements based on both overall and individual component leakage rate performance.

Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program," dated September 1995, was developed as a method acceptable to the NRC staff for implementing Option B. This regulatory guide states that the Nuclear Energy Institute (NEI) guidance document NEI 94-01, Rev. 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," provides methods acceptable to the NRC staff for complying with Option B with four exceptions which are described therein.

Option B requires that the regulatory guide, or other implementation document used by a licensee to develop a performance-based leakage testing program, must be included, by general reference, in the plant TS. The licensee has referenced Regulatory Guide 1.163, dated September 1995, in the Surry TS.

Regulatory Guide 1.163, dated September 1995, specifies an extension in Type A test frequency to at least one test in 10 years based upon two consecutive successful tests. Type B tests may be extended up to a maximum interval of 10 years based upon completion of two consecutive successful tests and Type C tests may be extended up to 5 years based on two consecutive successful tests.

By letter dated October 20, 1995, NEI proposed TS to implement Option B. After some discussion, the staff and NEI agreed on final TS which were transmitted to NEI in a letter dated November 2, 1995. These TS are to serve as a model for licensees to develop plant specific TS in preparing amendment requests to implement Option B.

In order for a licensee to determine the performance of each component, factors that are indicative of or affect performance, such as an administrative leakage limit, must be established. The administrative limit is selected to be indicative of the potential onset of component degradation.

Although these limits are subject to NRC inspection to assure that they are selected in a reasonable manner, they are not TS requirements. Failure to meet an administrative limit requires the licensee to return to the minimum value of the test interval.

Option B requires that the licensee maintain records to show that the criteria for Type A, B, and C tests have been met. In addition, the licensee must maintain comparisons of the performance of the overall containment system and the individual components to show that the test intervals are adequate. These records are subject to NRC inspection.

3.0 EVALUATION

The licensee's November 20, 1995, and March 14, 1996, letters to the NRC proposed TS changes to permit the use of Option B of the revised 10 CFR Part 50, Appendix J. Option B permits a licensee to choose Type A; or Type B and C; or Type A, B and C; testing to be done on a performance basis. The licensee has elected to perform Type A, B, and C testing on a performance basis. The TS changes refer to Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program," dated September 1995, which specifies methods acceptable to the NRC for complying with Option B. This requires changes to existing TS 4.4.B, 4.4.F, and 6.6.B.4.

These TS changes replace specific surveillance requirements related to containment leakage rate testing and the corresponding acceptance criteria and test methods with a requirement to perform the required testing as required by 10 CFR Part 50, Appendix J, Option B, as modified by approved exemptions, and in accordance with the guidelines contained in Regulatory Guide 1.163, dated September 1995. The licensee chose not to include its performance-based testing program in the TS as an administrative program, as was proposed in the November 2, 1995, letter to NEI discussed above. The November 2, 1995, letter provided guidance to licensees but is not an NRC requirement. The staff has reviewed the licensee's proposed TS changes and finds them consistent with the requirements of 10 CFR Part 50, Appendix J, Option B, in that the changes include general reference in the TS to the regulatory guide used by the licensee to develop the performance-based leakage-testing program for Surry Units 1 and 2. The staff therefore concludes that the licensee's request to implement 10 CFR Part 50, Appendix J, Option B, is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Virginia State official was notified of the proposed issuance of the amendments. The State official had no comment.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the 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 (60 FR 65686). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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.

6.0 CONCLUSION

The Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

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