

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

May 1, 1979

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attn: Mr. A. Schwencer, Chief  
Operating Reactors Branch No. 1  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Serial No. 307  
LQA/DWSjr:esh

Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Mr. Denton:

AMENDMENT TO OPERATING LICENSES  
SURRY POWER STATION, UNIT NOS. 1 AND 2  
PROPOSED TECHNICAL SPECIFICATION CHANGE NO. 66

On February 14, 1979, pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requested an amendment, in the form of changes to the Technical Specifications. The proposed changes were required to meet new inservice and testing requirements for nuclear power plant components. As a result of further review, recordkeeping requirements should also be modified to agree with ASME Section XI Code requirements. Therefore, a change to Technical Specification 6.5.B.7 is attached and is designated as a supplement to Change No. 66.

The Surry Power Station requirement for taking photographs of the scope traces for welds which are tested by ultrasonic techniques, and photographs of the surface of those welds inspected by visual or surface examinations originated from the Initial Decision associated with the operating license application. It appears the intent of this requirement was to provide additional assurance that the required welds were being examined. It is felt that in light of present ASME Section XI Code requirements and past ISI experience at Surry, this requirement is no longer needed and its deletion would not decrease the margin of safety assumed in the Technical Specifications for the following reasons:

- 1) The photographs never provided additional assurance that the required welds were being examined. They cannot be traced back to specific welds in the plant (other than by the labeling on the photograph); they do not provide information useful for further evaluation of the inspections; and no determination can be made from the photographs that the required welds were examined. In other words, the welds look alike when viewed from the photographs.
- 2) Section XI of the ASME Code requires that plans and schedules for inservice inspection be prepared and filed with the enforcement and regulatory authorities having jurisdiction at the plant site. It specifies the records to be maintained for the required examinations and qualifications of the examination personnel. Also the code provides for an independent "Authorized Inspection" to verify that the required examinations are being

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performed per code requirements. The inservice program is also periodically audited by the Vepco QA department.

- 3) Experience at Surry, as amplified in the 5 year ISI report, letter Serial No. 099, dated April 5, 1979, has shown that the required examinations are being performed, adequate records are being maintained and pressure boundary and support structure integrity is being maintained.
- 4) The proposed change is consistent with the present NRC position concerning ISI records. It was taken from the current Standard Technical Specifications applicable to Westinghouse plants.

The enclosed change has been reviewed and approved by the Station Nuclear Safety and Operating Committee and the System Nuclear Safety and Operating Committee. It has been determined that this request does not involve an unreviewed safety question.

Very truly yours,

*C. M. Stallings*

C. M. Stallings  
Vice President-Power Supply  
and Production Operations

Enclosure:

A. Proposed Change

cc: Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
Region II

COMMONWEALTH OF VIRGINIA     )  
  ) S. S.  
CITY OF RICHMOND             )

Before me, a Notary Public, in and for the City and Commonwealth aforesaid, today personally appeared C. M. Stallings, who being duly sworn, made oath and said (1) that he is Vice President-Power Supply and Production Operations, of the Virginia Electric and Power Company, (2) that he is duly authorized to execute and file the foregoing Amendment in behalf of that Company, and (3) that the statements in the Amendment are true to the best of his knowledge and belief.

Given under my hand and notarial seal this 1st day of  
May, 1979.

My Commission expires January 20, 1981.

Robert M. Reid  
Notary Public

(SEAL)

- B. Records relative to the following items shall be retained for the life of the plant.
1. Records of changes made to the plant and plant drawings as described in the FSAR pursuant to 10 CFR 50.59.
  2. Records of new and spent fuel inventory and assembly histories.
  3. Records of plant radiation and contamination surveys.
  4. Records of off-site environmental monitoring surveys.
  5. Records of radiation exposure of all plant personnel, and others as required by 10 CFR 20.
  6. Records of radioactivity in liquid and gaseous wastes released to the environment.
  7. Records of inservice inspections performed pursuant to these Technical Specifications.