

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

August 31, 1979

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

Serial No. 669

LQA/WRM:esh

Docket Nos. 50-280  
50-281

License Nos. DPR-32  
DPR-37

Dear Mr. Denton:

AMENDMENT TO OPERATING LICENSE DPR-32 AND DPR-37  
SURRY POWER STATION UNIT NO. 1 AND 2  
STEAM GENERATOR REPAIR PROGRAM  
PROPOSED CHANGE TO LICENSE CONDITION 3.G.2.b

Pursuant to 10CFR50.90, the Virginia Electric and Power Company requests an amendment to Operating Licenses DPR-32 and DPR-37 for the Surry Power Station Unit Nos. 1 and 2. The proposed changes are enclosed.

The NRC issued additional license conditions for the Steam Generator Repair Program (SGRP) for Surry Unit Nos. 1 and 2 under Amendment Nos. 47 and 46 respectively. License Condition 3.G.2.b, which applies to the SGRP for both units, requires that "the temporary containment and ventilation systems shall be operating for all cutting and grinding operations involving components with removable radioactive contamination > 2200 DPM per 100 cm<sup>2</sup> during the Steam Generator Repair Program. The intention of the condition was to assure the protection of personnel when performing such work as cutting or grinding on contaminated components, particularly where the nature of such work and the amount of contamination presented a significant potential for generating airborne radioactivity and the spread of radioactive materials. The NRC interpretation of this condition has defined "temporary containment" as including such localized controls as glove boxes and tent enclosures.

The application of this requirement to the SGRP for Surry Unit No. 2 has forced the use of glove boxes in numerous situations involving the removal of piping and valves located in the lower steam generator cubicles and elsewhere within the containment building where radiation doses were relatively high. The Surry Health Physics group performed an evaluation of several pipe cutting operations where glove boxes were required. This evaluation showed that in some cases, a significantly greater amount of exposure resulted from installing and removing the glove boxes than from performing the actual pipe cut. In one such instance, the installation and removal exposure was 50 times greater than the work performance exposure. The results of air samples taken in the vicinity of some pipe cutting operations performed within a tent enclosure have shown that the airborne radioactivity generated, if any, was usually localized to the extent that only those personnel actually performing the work

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were exposed to this hazard. Adequate personnel protection could be provided by the required use of personal respiratory protection equipment, while eliminating the additional unnecessary exposures involved with glove box use.

In light of these observations, the unqualified requirement to utilize glove boxes or other temporary enclosures is seen to be counter-productive toward achieving the major license condition objective of maintaining the exposure of personnel to radiation and radioactive materials "as low as is reasonably achievable" (ALARA). Cutting and grinding operations are required for many of the SGRP activities and involve varying circumstances and radiological hazards. A more effective method of satisfying the ALARA objective is to evaluate these operations on a case by case basis, using applicable survey data and prior experience, to determine if the use of temporary enclosures is in fact justified. The proposed change to License Condition 3.G.2.b provides the flexibility to more effectively satisfy the ALARA objective. The margin of safety provided by License Condition 3.G.2.b will not be decreased by the proposed change, but rather will be expanded to allow the consideration of all radiological hazards associated with a specific task.

This proposed 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.

We have evaluated this request in accordance with the criteria in 10 CFR 170.22. It has been determined that this request involves a Class III amendment fee of \$4,000.00 and a Class I amendment fee of \$400.00. Accordingly, we have enclosed a check in the amount of \$4,400.00 in payment of the Class I and the Class III amendment fees.

Very truly yours,



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

Attachments:

1. Proposed change to License Condition 3.G.2.b
2. Voucher check no. 32570 for \$4,400.00

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 4th day of  
September, 1979.

My Commission expires January 20, 1981.

Robert M. Nail  
Notary Public

(SEAL)

ATTACHMENT 1

PROPOSED CHANGE TO LICENSE CONDITION 3.G.2.b

A proposed change to License Condition 3.G.2.b is requested in accordance with the reasons stated in the accompanying letter.

The requested change is as follows:

- (2) (b) The temporary containment and ventilation systems shall be operating for all cutting and grinding operations involving components with removable radioactive contamination  $> 2200$  DPM per  $100 \text{ cm}^2$ , as deemed necessary based on overall ALARA considerations by the Health Physics Coordinator for the Steam Generator Replacement Project.