

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGES

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TABLE 3.7-1

REACTOR TRIP
INSTRUMENT OPERATING CONDITIONS

	COLUMN 1	COLUMN 2	COLUMN 3	COLUMN 4
<u>FUNCTIONAL UNIT</u>	<u>MINIMUM OPERABLE CHANNELS</u>	<u>DEGREE OF REDUNDANCY</u>	<u>PERMISSIBLE BYPASS CONDITIONS</u>	<u>OPERATOR ACTION IF CONDITIONS OF COLUMN 1 OR 2, EXCEPT AS CONDITIONED BY COLUMN 3, CANNOT BE MET</u>
17. Low Steam Generator Water Level With Steam/Feedwater Mismatch Flow	1/non-isolated loop 1/non-isolated loop	- -		Maintain hot shutdown
18. A. Reactor Trip Breakers	2	1		Maintain hot shutdown
B. Reactor Trip Bypass Breaker	1	0		***
19. Auto Trip Logic				
A. Undervoltage Trip Logic	2	1		Maintain hot shutdown
B. Shunt Trip Logic	2	1		Maintain hot shutdown

** If both misalignment monitors (a and b) inoperable for 2 hours or more, the nuclear overpower trip shall be reset to 93 percent of rated power in addition to the increased surveillance noted.

*** Terminate testing of Reactor Trip Breakers and open the Reactor Trip Bypass Breakers.

TABLE 4.1-1 (Continued)

<u>Channel Description</u>	<u>Check</u>	<u>Calibrate</u>	<u>Test</u>	<u>Remarks</u>
26. Environmental Radiation Monitors	*M	N.A.	N.A.	TLD Dosimeters
27. Logic Channel Testing	N.A.	N.A.	M	
28. Turbine Overspeed Protection Trip Channel (Electrical)	N.A.	R	R	
29. Turbine Trip Setpoint	N.A.	R	R	Stop valve closure or low EH fluid pressure
30. Seismic Instrumentation	M	R	M	
31. Reactor Trip Breaker	N.A.	N.A.	M	
a. Undervoltage Trip Logic	N.A.	N.A.	M	
b. Shunt Trip Logic	N.A.	N.A.	M	
32. Reactor Coolant Pressure	N.A.	R	N.A.	
33. Auxiliary Feedwater				
a. Steam Generator Water Level Low-Low	S	R	M	
b. RCP Undervoltage	S	R	M	
c. S.I.	(All Safety Injection surveillance requirements)			
d. Station Blackout	N.A.	R	N.A.	
e. Main Feedwater Pump Trip	N.A.	N.A.	R	

Page 4.1-8a is deleted. Item 34, Loss of Power, also appears on page 4.1-9.
The legend at the bottom of page 4.1-8a has also been moved to page 4.1-9.

TABLE 4.1-1 (Continued)

<u>Channel Description</u>	<u>Check</u>	<u>Calibrate</u>	<u>Test</u>	<u>Remarks</u>
34. Loss of Power				
a. 4.16 KV Emergency Bus Under-voltage (Loss of Voltage)	N.A.	R	M	
b. 4.16 KV Emergency Bus Under-voltage (Degraded Voltage)	N.A.	R	M	
35. Control Room Chlorine Detectors	S	R	M	
36. Manual Reactor Trip	N.A.	N.A.	R	
37. Reactor Trip Bypass Breaker				
a. Undervoltage attachment	N.A.	N.A.	M	Test prior to placing in service
b. Shunt trip attachment	N.A.	N.A.	R	

S - Each shift

D - Daily

W - Weekly

N.A. - Not applicable

SA - Semiannually

Q - Every 90 effective full power days

M - Monthly

P - Prior to each startup if not done previous week

R - Each Refueling Shutdown

BW - Every two weeks

AP - After each startup if not done previous week

*See Specification 4.1D

ATTACHMENT 2

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGES

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGE

Revisions to the Surry 1 and 2 Technical Specifications are required as a result of the NRC Staff's issuances of their Safety Evaluation Report (SER) for the Auto Shunt Trip Modification. The Staff's review approved the Auto Shunt Trip Modification and indicated a need for additional testing of the Reactor Trip Breakers and its associated equipment. To meet these requirements, revised specifications are submitted for the Reactor Trip Bypass Breakers, Undervoltage Trip logic and Shunt Trip Logic. Revised Limiting Conditions for Operation (LCO) and Surveillance Requirements (SR) require Reactor Trip Bypass Breaker testing prior to the routine testing of the Reactor Trip Breakers to further assure the operability of the Bypass Breaker during the testing of the Main Breaker. Secondly, LCO's and SR's are submitted which require operability and surveillance of both the Undervoltage and Shunt Trip Logic features. Testing of the newly installed Auto Shunt Trip feature will be accomplished in accordance with the Westinghouse Owners Group technique. Thirdly, the existing specifications for the Manual Trip feature are adequate to assure operability. A new Surveillance Requirement is submitted to assure surveillance is performed at the Refueling interval. Testing of the Manual feature will be accomplished in accordance with approved station procedures and by the method described in the SER.

Pursuant to 10CFR50.59, an evaluation to determine whether an unreviewed safety question exist has been made. It has been concluded that:

- 1) The proposed change does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the Surry Final Safety Analysis Report (SAR). The increased operability and testing requirements proposed with this change will help ensure that the reactor trip system will function properly and that the consequences of a transient are within the bounds of the existing safety analyses.
- 2) The proposed change does not create the possibility for an accident or malfunction of a different type than any previously evaluated in the SAR. The increased operability and testing requirements proposed with this change will help ensure that any transient which may occur will not be compounded by the failure of the reactor to trip on demand.
- 3) The proposed change does not reduce the margin of safety as defined in the basis for any Technical Specification. Rather, the margin of safety is considered to be increased since the increased operability and testing requirements should ensure a more reliable reactor trip system.

We have also determined that the proposed change does not involve a significant hazards consideration. The NRC has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48FR14870). The examples of actions involving no significant hazards consideration include: "....(ii) A change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications, for example, a more stringent surveillance requirement." The proposed change is encompassed by this example in that the proposed change adds additional operability and surveillance requirements on the Reactor Trip Bypass Breakers and the Undervoltage and Shunt Trip logic as well as additional surveillance requirement on the Manual Trip circuitry.

It has been concluded from our review that this proposed Technical Specification change does not involve an unreviewed safety question as defined in 10CFR50.59 nor a significant hazards consideration as defined in 10CFR50.92.