

Attachment 1

Proposed Technical Specifications Changes

2. The specific activity of the reactor coolant shall be limited to $\leq 1.0 \mu\text{Ci/cc DOSE EQUIVALENT-I-131}$ whenever the reactor is critical or the average temperature is greater than 500°F .
3. The requirements of D-2 above may be modified to allow the specific activity of the reactor coolant $> 1.0 \mu\text{Ci/cc DOSE EQUIVALENT I-131}$ but less than $10.0 \mu\text{Ci/cc DOSE EQUIVALENT I-131}$. Following shutdown, the unit may be restarted and/or operation may continue for up to 48 hours provided that operation under these circumstances shall not exceed 10 percent of the unit's total yearly operating time. With the specific activity of the reactor coolant $> 1.0 \mu\text{Ci/cc DOSE EQUIVALENT I-131}$ for more than 48 hours during one continuous time interval or exceeding $10.0 \mu\text{Ci/cc DOSE EQUIVALENT I-131}$, the reactor shall be shut down and cooled to 500°F or less within 6 hours after detection.
4. If the specific activity of the reactor coolant exceeds $1.0 \mu\text{Ci/cc DOSE EQUIVALENT I-131}$ or $100/\bar{E} \mu\text{Ci/cc}$, a report shall be prepared and submitted to the Commission pursuant to Specification 6.6.A.3. This report shall contain the results of the specific activity analysis together with the following information:
 - a. Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded,
 - b. Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded,

- c. History of degassing operations, if any, starting 48 hours prior to the first sample in which the limit was exceeded, and
- d. The time duration when the specific activity of the primary coolant exceeded 1.0 $\mu\text{Ci/cc}$ DOSE EQUIVALENT I-131.

- (1) A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions,^{2/} e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

3. Monthly Operating Report

Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the Reactor Coolant System PORV's or safety valves, shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, with a copy to the Regional Office of Inspection and Enforcement, no later than the 15th of each month following the calendar month covered by the report. When necessary, the information in Specification 3.1.D.4 shall be included in the report.

Attachment 2

Discussion of Proposed Changes

Discussion of Proposed Change

Specifications 3.1.D.3 and 3.1.D.4 have been revised as allowed by Generic Letter 85-19, "Reporting Requirements on Primary Coolant Iodine Spikes." The Generic Letter states that licensees may eliminate the existing requirement to shut down a plant if coolant iodine activity limits are exceeded for 800 hours in a 12 month period. No corresponding shutdown requirement exists in the Surry Technical Specifications. However, Specification 3.1.D.3 currently requires that a Special Report be submitted if coolant iodine activity limits are exceeded for 300 hours in a 6 month period. Because the Generic Letter also states that the reporting requirements for iodine spiking can be reduced from a short-term report (i.e., License Event Report or Special Report) to an item which is included in an annual report, Specification 3.1.D.3 has been eliminated with the appropriate reporting requirement now fulfilled under Specification 6.6.A.3. Because Surry does not submit an annual report, Specification 6.6.A.3 has been revised to include the iodine spiking information in the Monthly Operating Report.

In accordance with the Generic Letter, the information regarding fuel burnup by core region has also been deleted from Specification 3.1.D.4.

As discussed in the Generic Letter, the quality of nuclear fuel has been greatly improved over the past decade with the result that coolant iodine activity is normally well below the Tech. Specs. limit. In addition, 10 CFR 50.72 (b)(1)(ii) requires the licensee to immediately notify the NRC if fuel cladding failures exceed expected values or are caused by unexpected factors. Thus the 300 hour limit is no longer considered necessary on the basis that proper fuel management and existing reporting requirements should preclude ever approaching the limit.

BASIS FOR NO SIGNIFICANT HAZARDS DETERMINATION

The proposed changes do not involve a significant hazards consideration because operation of Surry Units 1 & 2 in accordance with these changes would not:

- (1) involve a significant increase in the probability or consequence of an accident previously evaluated. The changes involve administrative changes specified in Generic Letter 85-19. The deletion of the requirement to submit a Special Report if the coolant activity limit is exceeded for more than 300 hours in any 6 month period is not considered necessary because of the increased quality of nuclear fuel production and management, and the requirement of 10 CFR 50.72 (b)(1)(ii) for immediate notification if fuel clad failures exceed expected values should preclude approaching the limit.
- (2) create the possibility of a new or different kind of accident from any accident previously identified. The changes involve administrative changes specified in Generic Letter 85-19. The deletion of the requirement to submit a Special Report if the coolant activity limit is exceeded for more than 300 hours in any 6 month period is not considered necessary because of the increased quality of nuclear fuel production and management, and the requirement of 10 CFR 50.72 (b)(1)(ii) for immediate notification if fuel clad failures exceed expected values should preclude approaching the limit.
- (3) involve a significant reduction in a margin of safety. The changes involve administrative changes specified in Generic Letter 85-19. The deletion of the requirement to submit a Special Report if the coolant activity limit is exceeded for more than 300 hours in any 6 month period is not considered necessary because of the increased quality of nuclear fuel production and management, and the requirement of 10 CFR 50.72 (b)(1)(ii) for immediate notification if fuel clad failures exceed expected values should preclude approaching the limit.

Therefore, pursuant to 10 CFR 50.92, based on the above consideration, it has been determined that this change does not involve a significant safety hazards consideration.