

ATTACHMENT 2

MARKED-UP TECHNICAL SPECIFICATIONS CHANGE

**VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2**

9902220351 990216
PDR ADOCK 05000280
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TABLE 4.2-1

SECTION A. MISCELLANEOUS INSPECTIONS

<u>Item No.</u>	<u>Required Examination Area</u>	<u>Required Examination Methods</u>	<u>10-Year Interval Inspection</u>	<u>Remarks</u>
1.1	Deleted			
1.2	Low Head SIS piping located in valve pit	Visual	Non-applicable	This pipe shall be visually inspected once per 18 months.
1.3	Primary Pump Flywheel	See remarks	See remarks	Examination to be conducted in accordance with regulatory position C.4.b of regulatory guide 1.14 Rev. 1, August 1975
1.4	Low Pressure Turbine Rotor	Visual and Magnetic Particle or Dye Penetrant	See remarks	100% of blades every six operating years. Inspections are normally performed concurrent with LP turbine rotor disk and hub inspections.

and replace with the following:

Inspect once every 10 years by a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (MT and/or PT) of exposed surfaces defined by the volume of the disassembled flywheels.

ATTACHMENT 3

REVISED TECHNICAL SPECIFICATIONS

**VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2**

TABLE 4.2-1

SECTION A. MISCELLANEOUS INSPECTIONS

<u>Item No.</u>	<u>Required Examination Area</u>	<u>Required Examination Methods</u>	<u>10-Year Interval Inspection</u>	<u>Remarks</u>
1.1	Deleted			
1.2	Low Head SIS piping located in valve pit	Visual	Non-applicable	This pipe shall be visually inspected once per 18 months.
1.3	Primary Pump Flywheel	See remarks	See remarks	Inspect once every 10 years by a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (MT and/or PT) of exposed surfaces defined by the volume of the disassembled flywheels.
1.4	Low Pressure Turbine Rotor	Visual and Magnetic Particle or Dye Penetrant	See remarks	100% of blades every six operating years. Inspections are normally performed concurrent with LP turbine rotor disk and hub inspections.

Amendment Nos.

ATTACHMENT 4

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

**VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2**

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Virginia Electric and Power Company has reviewed the requirements of 10CFR50.92 as they relate to the proposed change to the Surry Units 1 and 2 Technical Specifications and determined that a significant hazards consideration is not involved. The proposed change reduces the inspection requirements for the reactor coolant pump flywheels as previously generically approved by the NRC and supported by WCAP-14535A, "Topical Report on Reactor Coolant Pump Flywheel Inspection Elimination".

Reactor coolant pump motor flywheels have been subjected to an augmented inspection program that satisfies the requirements of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, "Reactor Coolant Pump Flywheel Integrity," dated August 1975. Regulatory Guide 1.14, prepared in response to a concern over overspeed of the RCP and its potential for failure, describes an acceptable method to ensure RCP flywheel integrity. These inspections include an in-place volumetric ultrasonic (UT) examination of the areas of higher stress concentration at the bore and keyway every 3 years, and a surface examination of all exposed surfaces and complete UT volumetric examination every 10 years.

A survey of Westinghouse Owners Group utilities including Surry reported on a total of 729 examination results. The survey found no indication which would affect the integrity of the flywheels. The inspection record, plus concerns over inspection costs and personnel radiation exposure prompted Westinghouse Energy Systems to prepare WCAP-14535A to demonstrate through fracture mechanics analysis that flywheel inspections can be eliminated without impairing plant safety. Therefore, Westinghouse Energy Systems prepared report WCAP-14535A to quantify the effects of eliminating flywheel inspections. The NRC has reviewed, evaluated and approved the technical basis of the report.

WCAP-14535A provides the technical basis for eliminating the augmented inspection of the reactor coolant pump flywheels and applies to all flywheels manufactured by Westinghouse. Although accepting the technical arguments presented in the report, the NRC only granted partial relief from the RCP flywheel inspection requirements, requiring a continued inspection on a ten year frequency.

Only the inspection of the RCP flywheel is affected by the proposed change. The affect of the proposed change on the structural integrity of the RCP flywheel is shown to be negligible in the technical basis of WCAP-14535A. In support of this conclusion, the following analysis is provided.

- a) The reduction of the inspection requirements for the reactor coolant pump flywheels, as generically approved by the NRC and technically supported by WCAP-14535A, does not significantly increase the probability of an accident previously evaluated in the safety analysis report. The results of WCAP-14535A have been reviewed and evaluated with the technical basis accepted for referencing in license applications by

the NRC in their letter entitled "Acceptance for referencing of Topical Report WCAP-14535, Topical Report on Reactor Coolant Pump Flywheel Inspection Elimination," dated September 12, 1996.

The proposed Technical Specification change reduces the surveillance requirements (inspection) on the RCP flywheel. There is no change in the method of plant operation or system design. The WCAP-14535A report establishes that the proposed change has a negligible affect on the probability that the flywheel will fail given that the flywheels received preservice and inservice examinations as required previously. Therefore, the proposed change does not increase the probability of occurrence or consequences of any previously analyzed accident.

- b) The proposed change to reduce the inspection requirements for the RCP flywheels as generically approved by the NRC and supported by WCAP-14535A does not create the possibility of a new or different kind of accident from any accident previously evaluated in the safety analysis report.

The proposed surveillance requirements (inspection) only reduce the inspection requirements/frequency for the reactor coolant pump flywheels, and there is no change in the method of plant operation or system design.

- c) The proposed change reducing the inspection of the RCP flywheels as generically approved by the NRC and supported by WCAP-14535A, does not impact the accident analysis assumptions or the basis of any Technical Specification. As previously stated, the analysis performed in the WCAP-14535A report established that the affect on flywheel failure probability was negligible given that the initial preservice and inservice inspections under the current requirements were performed. Therefore, the proposed change in surveillance (inspection) frequency does not involve a significant reduction in the margin of safety.

The analysis provided herein demonstrates that the proposed amendment to the Surry Technical Specifications does not involve a significant increase in the probability or consequences of a previously evaluated accident, does not create the possibility of a new or different kind of accident, and does not involve a significant reduction in a margin of safety.