

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 24, 1998

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 98-125
NL&OS/GDM R0
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
TECHNICAL SPECIFICATIONS CHANGE SUPPLEMENT
RELOCATION OF FIRE PROTECTION REQUIREMENTS

Virginia Electric and Power Company submitted a Technical Specifications (TS) change request on January 26, 1993 (Serial No. 92-727) to relocate the fire protection requirements from the TS to the Updated Final Safety Analysis Report (UFSAR). The request was subsequently withdrawn by our letter dated April 23, 1996 (Serial No. 96-104) to facilitate a detailed review and clarification of our fire protection licensing basis as specified in the NRC's Fire Protection Safety Evaluation Report for Surry Power Station dated September 19, 1979. Upon completion of this review, we provided clarifications to the NRC's SER and resubmitted the TS change request to the NRC for approval in its original form in our letter dated September 12, 1996 (Serial No. 96-104A). However, since the TS change request was originally submitted, certain TS requirements assumed by the original Technical Specifications change request have been deleted by a separate, unrelated TS amendment. Therefore, to ensure that the necessary TS requirements are in place to meet Generic Letter guidance for relocating fire protection requirements from the TS to the UFSAR, one previously requested TS change item has been revised and a new TS requirement has been added. 11

A discussion of the supplemental Technical Specifications change is provided in Attachment 1. The two proposed Technical Specifications pages affected by this supplement are provided in Attachment 2. It has been determined that the proposed Technical Specifications change supplement does not involve an unreviewed safety question as defined in 10 CFR 50.59 or a significant hazards consideration as defined in 10 CFR 50.92. The basis for our determination that the supplemental change does not involve a significant hazards consideration is provided in Attachment 3. The proposed Technical Specifications change supplement has been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee. The complete proposed TS change request

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pages, which incorporate the two changes made by this supplement, are provided in Attachment 4 for your information. Due to the extensive number of procedures that will require revision upon the approval of this Technical Specification change request, a sixty (60) day implementation period is requested.

Should you have any questions or require additional information, please contact us.

Very truly yours,



James P. O'Hanlon
Senior Vice President - Nuclear

Attachments

1. Discussion of Change
2. Proposed Supplemental Technical Specifications Change
3. Significant Hazards Consideration Determination
4. Complete Proposed Technical Specifications Pages

cc: U. S. Nuclear Regulatory Commission
Region II
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61 Forsyth Street, SW, Suite 23T85
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Mr. R. A. Musser
NRC Senior Resident Inspector
Surry Power Station

Commissioner
Bureau of Radiological Health
Room 104A
1500 East Main Street
Richmond, Virginia 23219

Commitment Summary

1. The commitments made in this letter are as indicated in the proposed Technical Specifications.

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by J. P. O'Hanlon, who is Senior Vice President - Nuclear, of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 24th day of September, 19 98.

My Commission Expires: March 31, 2000.

Maggie McClure
Notary Public

(SEAL)

Attachment 1

Discussion of Change

DISCUSSION OF CHANGE

INTRODUCTION

Virginia Electric and Power Company (Virginia Power) previously submitted a Technical Specifications change request to relocate the Fire Protection (FP) requirements from the Technical Specifications (TS) to the Updated Final Safety Analysis Report (UFSAR). The submitted TS change request was based on the NRC guidance provided in Generic Letters (GL) 86-10, "Implementation of Fire Protection Requirements," and 88-12, "Removal of Fire Protection Requirements From Technical Specifications." During the NRC's review of the TS change request, certain areas that deviated from the guidance provided in the Generic Letters were questioned, and the NRC requested Virginia Power to revise the change request to adhere to the GL guidance in its entirety or to provide additional justification of how the intent of the GL guidance was being met. This revised TS change request resolves the NRC comments as discussed in detail below.

This revised TS change request is administrative in nature, and, as such, does not result in an unreviewed safety question or a significant hazards consideration.

BACKGROUND

Pursuant to NRC guidance provided in Generic Letters (GL) 86-10, "Implementation of Fire Protection Requirements," and Generic Letter 88-12, "Removal of Fire Protection Requirements From Technical Specifications," Virginia Power submitted a Technical Specifications (TS) change request to relocate FP requirements from the TS to the UFSAR. The Generic Letters' guidance consisted of various elements to be implemented that would assure NRC approval. Deviation from these elements, it was noted, would require more detailed NRC review for approval.

Licensing Basis

Generic Letters 86-10 and 88-12 permit licensees to remove their fire protection programs from their Technical Specifications and incorporate them into their UFSARs. GL 88-12 provided the elements that a licensee should include in a license amendment request to remove fire protection requirements from the TS. The five elements specified are as follows:

1. The NRC-approved Fire Protection Program must be incorporated into the Final Safety Analysis Report and submitted with certification as required by 10 CFR 50.71(e)(2).
2. The Limiting Conditions for Operation (LCO) and Surveillance Requirements associated with the fire detection systems, fire suppression systems, fire barriers,

and the administrative controls that address fire brigade staffing would be relocated from the TS.

3. All operational conditions, remedial actions, and test requirements presently included in the TS for these systems, as well as the fire brigade staffing requirements, shall be incorporated into the Fire Protection Program.
4. The standard fire protection license condition in Generic Letter 86-10 must be included in the license. Any other current fire protection license conditions shall be removed.
5. The Administrative Controls section of the TS shall be augmented to support the Fire Protection Program by adding two specifications. First the Onsite Review Group shall be given the responsibility for the review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Offsite or Corporate Review Group. Second, Fire Protection Program implementation shall be added to the list of elements for which written procedures shall be established, implemented and maintained.

Virginia Power submitted a Technical Specifications change request on January 26, 1993 (Serial No. 92-727) to relocate the fire protection requirements from the TS to the UFSAR. The request was subsequently withdrawn by our letter dated April 23, 1996 (Serial No. 96-104) to facilitate a detailed review and clarification of our fire protection licensing basis as specified in the NRC's Fire Protection Safety Evaluation Report for Surry Power Station dated September 19, 1979. Upon completion of this review, we provided clarifications to the NRC's SER and resubmitted the TS change request to the NRC for approval in its original form in our letter dated September 12, 1996 (Serial No. 96-104A).

The original TS change request met elements 1-4 above as requested by GL 88-12. However, we took exception to element 5 to maintain TS consistency. Element 5 above requires SNSOC review of changes to the Fire Protection Program and implementing procedures and the submittal of recommended changes to an offsite review group. The proposed TS change request, however, revised the TS to require the submittal of recommended changes to the Station Manager (now the Site Vice President) as opposed to an offsite review group. As noted in GL 88-12, the Emergency Plan and the Security Plans were used as models to determine the appropriate administrative controls for the FP Program. At the time of the original TS change request submittal, Surry's TS included a requirement for SNSOC to review changes to the Emergency and Security Plans and their implementing procedures and to submit recommended changes to the Station Manager. Therefore, to maintain consistency with the TS and the intent of the GL 88-12, the FP Program administrative specification was also written to provide recommended changes to the Station Manager, as opposed to an offsite review group.

However, since the TS change request was originally submitted, the specific Technical Specifications that required Station Manager approval for changes to the Emergency and Security Plans have been deleted by a separate, unrelated TS amendment. In a letter dated July 20, 1993 (Serial No. 93-356), Virginia Power submitted a TS change request as a Cost Beneficial Licensing Action to delete certain specific review and audit frequency requirements from the TS. Part of the basis for the TS change request was that the review and audit requirements being deleted were already addressed in other documents (e.g., Code of Federal Regulations, TS License Condition I, Operational Quality Assurance Program Topical Report, etc.) However, when that TS change request was submitted, and later approved by the NRC in their Safety Evaluation Report for TS Amendment No. 188 dated March 1, 1994, the inconsistency with the proposed fire protection TS relocation change request was not recognized.

Therefore, an administrative TS that requires SNSOC review of changes to the Fire Protection Program and implementing procedures and the submittal of recommended changes to the designated offsite management responsible for reviewing changes that pertain to Fire Protection is being incorporated into the TS. The offsite review function for changes to the Fire Protection Program and its implementing procedures is already addressed in station procedures.

Element 5 above also requires that a statement must be included in the administrative controls section of the Technical Specifications that states that the facility FP program and implementing procedures have been established and are implemented and maintained. Such a statement resided in the Surry TS at the time of the original TS change submittal to the NRC, therefore no TS changes were required to meet this requirement. However, the same TS amendment that deleted the requirement for the Station Manager to review changes to the Emergency and Security Plans and implementing procedures also deleted the required FP Program and procedure statement from the TS. As noted above, the basis for the deletions was that these requirements are redundant with other higher-tier regulatory documents. This TS change request re-instates the deleted statement, in part, consistent with GL 88-12 guidance.

SPECIFIC CHANGES

Specific changes to Section 6 of the Technical Specifications (TS) are being made as indicated below. These changes either revise, or are in addition to, the original proposed TS change provided in our letter dated January 26, 1993 (Serial No. 92-727).

- **TS 6.1.C.1.f.13**

TS 6.1.C.1.f.13, added in our original Technical Specification change request dated January 26, 1993 (Serial No. 92-727), is being revised. Our original

submittal noted that changes to the Fire Protection Program and implementing procedures require review by the Station Nuclear Safety and Operating Committee (SNSOC) and recommended changes shall be submitted to the Station Manager. However, consistent with element #5 of GL 88-12, the proposed TS is being revised to require SNSOC to submit recommended changes to the offsite review group. Therefore, TS 6.1.C.1.f.13 is revised to read as follows:

13. Review of the Fire Protection Program and implementing procedures and shall submit recommended Program changes to the designated offsite management responsible for reviewing changes that pertain to Fire Protection.

- TS 6.4.E

TS 6.4.E is added to re-instate a portion of the previously deleted TS 6.4.J that requires the establishment, implementation and maintenance of the Fire Protection Program and implementing procedures. The new TS 6.4.E is included as follows:

- E. The facility Fire Protection Program and implementing procedures which have been established for the station shall be implemented and maintained.

SAFETY SIGNIFICANCE

These changes are administrative in nature and only incorporate two additional programmatic requirements into the TS. Plant modifications are not being implemented, nor are station operations being affected in any way. The Fire Protection Program is being retained and maintained in the UFSAR and station procedures. Since the TS changes are administrative in nature, there is no increase in the probability or consequences of an accident, no accident of a different type is created, and the margin of safety is unaffected. Therefore, the proposed change to the Technical Specifications has no impact on safety and does not result in an unreviewed safety question.