assumed in the accident analysis. Since the proposed change does not affect the Limiting Conditions for Operation for the containment, the containment penetrations, or the other safety systems, the consequences of an accident are not affected by the changes in test frequency.

2. Create the possibility of a new or different type of accident than those previously evaluated in the UFSAR.

Implementing the proposed Technical Specifications change to remove the prescriptive testing requirements and permit use of Appendix J, Option B, performance-based testing of containment and its penetrations do not create the possibility of an accident of a different type than was previously evaluated in the UFSAR. Plant systems and components will not be operated in a different manner as a result of the proposed Technical Specifications change. Thus, the proposed Technical Specifications change in leakage-rate test frequency does not introduce any new accident precursors or modes of operation. The containment and containment penetrations will not be operated any differently as a result of the proposed change.

Therefore, the possibility for an accident of a different type than was previously evaluated in the Safety Analysis Report is not created by the proposed Technical Specifications change.

3. Involve a significant reduction in a margin of safety.

The proposed change, which replace[s] the present prescriptive testing requirements with Appendix J, Option B, performance-based testing of containment and its penetrations, will continue to ensure that the existing accident analysis assumptions are maintained. The containment and containment penetrations will not be operated or tested any differently. Only the leakage rate test frequency is being changed as a result of the proposed change. The operational leakage-rate test acceptance criteria and the operability requirements are not being changed.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room location: The Alderman Library, Special Collections Department, University of Virginia, Charlottesville, Virginia 22903-2498.

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Virginia Electric and Power Company, Docket Nos. 50-280 and 50-281, Surry Power Station, Unit Nos. 1 and 2, Surry County, Virginia

Date of amendment request: November 20, 1995

Description of amendment request: The proposed changes to the Surry Technical Specifications would eliminate the existing prescriptive testing requirements for leakage rate testing of the containment and instead reference the Nuclear Regulatory Commission (NRC) Regulatory Guide 1.163,'' Performance-Based Containment Leak-Test Program,'' which would permit use of the performance-based leakage rate testing, Option B of 10 CFR Part 50 Appendix J.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

Specifically, operation of Surry Power Station with the proposed change will not:

1. Involve a significant increase in either the probability of occurrence or consequences of any accident or equipment malfunction scenario which is important to safety and which has been previously evaluated in the Updated Final Safety Analysis Report (UFSAR).

Plant systems and components will not be operated in a different manner as a result of the proposed Technical Specifications change. The proposed change permits a performance-based approach to determining the leakage-rate test frequency for the containment and containment penetrations (Type A, B, and C tests). There are no plant modifications, or changes in methods of operation. Therefore, the changes in testing intervals for the containment and containment penetrations have no [e]ffect on the probability of occurrence of a LOCA [loss-of-coolant accident]. Since the proposed change only affects the test frequency for containment and the containment penetrations, and the as-found test acceptance criteria at Surry the probability of occurrence and the consequences of an accident are not affected by the proposed changes in the leak-rate test interval.

The proposed change increases the probability of a malfunction of equipment important to safety due to the longer intervals between leakage tests. It has been estimated that the longer test intervals will increase the overall accident risk to the public by approximately 0.7% and 2.2% (for changes in the frequency of Type A tests and Type B and C tests, respectively). However, this increase in accident risk has been judged to be insignificant. This increase has been reviewed and judged to be acceptable by the NRC as documented in NUREG-1493 and the recent rulemaking to 10 CFR 50 Appendix J.

The containment and other safety system remain operable as assumed in the accident analysis. Changing the as-found acceptance criterion to 1.0 La at Surry does not increase the probability or consequences of an accident, since the accident analysis assume[s] a leakage rate of La for Design Basis Accidents. The as-left Type A test acceptance criterion remains at less than [or equal to] 0.75 La. Since the proposed changes do not affect the Limiting Conditions for Operation for the containment, the containment penetrations, or the other safety systems, the consequences of an accident are not affected by the changes in test frequency.

Therefore, the probability of an accident or consequences of an accident are not adversely affected as a result of this change.

2. Create the possibility of a new or different type of accident than those previously evaluated in the UFSAR.

Implementing the proposed Technical Specifications change to remove the prescriptive testing requirements and permit use of Appendix J, Option B, performance-based testing of containment and its penetrations does not create the possibility of an accident of a different type than was previously evaluated in the UFSAR. Plant systems and components will not be operated in a different manner as a result of the proposed Technical Specifications changes. Thus, the proposed Technical Specifications changes in leakage-rate test frequency do not introduce any new accident precursors or modes of operations. The containment and containment penetrations will not be operated any differently as a result of the proposed changes. Therefore, the possibility for an accident of a different type than was previously evaluated in the Safety Analysis Report is not created by the proposed Technical Specifications change.

3. Involve a significant reduction in a margin of safety.

The proposed Technical Specifications change, which replace[s] the present prescriptive testing requirements with Appendix J, Option B, performance-based testing of containment and its penetrations, will continue to ensure that the existing accident analysis assumptions are maintained. The containment and containment penetrations will not be operated or tested any differently. The leakage rate test frequency is being changed as a result of the proposed change. Changing the as-found acceptance criterion to 1.0 La at Surry does not increase the consequences of an accident, since the accident analysis assume[s] a leakage rate of La for Design Basis Accidents. The as-left Type A test acceptance criterion remains at less than [or equal to] 0.75 La, which maintains the operating margin. The operational leakage-rate test acceptance criteria and the operability requirements are not being changed. Therefore, the margin of safety as defined in the Technical Specifications bases is unaffected.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.