

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

January 10, 2000

Document Control Desk  
United States Nuclear Regulatory Commission  
Washington, D. C. 20555

Serial No. 99-620  
NAF-GD/LIC-GDM R0  
Docket Nos. 50-280, 281  
License Nos. DPR-32, 37

Gentlemen:

**REVISED PLAN FOR ALTERNATE SOURCE TERM IMPLEMENTATION  
SURRY POWER STATION UNITS 1 AND 2**

In a letter dated January 29, 1999 (Serial No. 98-729), Virginia Electric and Power Company initially informed the NRC of our intention to participate in the Alternate Source Term (AST) pilot plant program for Surry Power Station, Units 1 and 2. We also noted in that letter that we were preparing the project scope and schedule in support of our participation in the pilot program, and provided a tentative date for submittal of a license amendment for implementation of the AST for Surry. We have since committed significant effort and resources towards the development of our pilot plant submittal and have further defined the scope and schedule for the submittal of the associated license amendment request. This information was discussed during a December 8, 1999 teleconference between Virginia Power personnel and NRC staff and is documented below.

Virginia Power remains committed to employing the technology associated with the AST program at Surry Power Station. We have been involved with the AST effort since March 1997 when our respective staff personnel met to discuss provision of Surry analysis data for the NRC-sponsored re-baselining analysis effort. We are members of the NEI Source Term Task Force and have recently become involved in the NEI Control Room Habitability Task Force. Furthermore, the Surry pilot plant application will provide an additional PWR facility to complement the existing pilot plants.

We are currently reviewing calculations and preparing a license amendment request for the alternate source term effort. The following key items will be included in the proposed license amendment request and are provided for use by the NRC staff to prepare for review of the Surry request:

- event reanalyses for LBLOCA and Fuel Handling Accidents
- full implementation of AST as the plant licensing basis

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- elimination of credit for auxiliary building filtration (but retention of the Technical Specification LCOs for the system)
- allowance for an open personnel airlock during refueling operations
- allowance for positive containment pressure (versus subatmospheric) for up to 6 hours after DBA
- use of PAVAN (NUREG/CR-2858) methodology for offsite atmospheric dispersion factors
- use of ARCON96 (NUREG/CR-6331) methodology for onsite atmospheric dispersion factors
- use of NUREG-5966 methodology for containment spray iodine removal coefficients

It is anticipated that the necessary license amendment application will be submitted by March 31, 2000. If we anticipate a delay of two weeks or more from this date we will notify the Staff accordingly.

As noted in our letter referenced above, we request that the review fees associated with the NRC evaluation of our license amendment submittal be waived. This request is made pursuant to 10 CFR 170.11(b)(1), which governs exemptions from fees granted upon the initiative of the NRC. This request is based on 1) the participation of Surry Power Station as a pilot plant and as a member of the NEI Task Force that supported the development of the proposed rule and associated regulatory guide, and 2) the technical information and support provided by Virginia Power for the Surry units which were analyzed by the NRC during the re-baselining analysis effort associated with the AST development work.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "David A. Christian". The signature is fluid and cursive, with a long horizontal stroke at the end.

David A. Christian  
Vice President – Nuclear Operations

Commitments contained in this letter: None.

cc: U.S. Nuclear Regulatory Commission  
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