

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

April 27, 2000

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20005

Serial No.	00-229
NL&OS/GDM	R1
Docket No.	50-281
License No.	DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 2
RISK-INFORMED INSERVICE INSPECTION PROGRAM

In a letter dated December 10, 1999 (Serial No. 99-518), Virginia Electric and Power Company committed to submit a Risk-Informed Inservice Inspection (RI-ISI) Program for Surry Unit 2 by April 2000. The RI-ISI Program is provided herein as an alternative to the current ASME Section XI inspection requirements for piping. The RI-ISI Program has been developed in accordance with the Westinghouse Owners Group Topical Report WCAP-14572, Revision 1-NP-A, "Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report." The attached document supports the conclusion that the proposed alternative provides an acceptable level of quality and safety as required by 10 CFR 50.55a(a)(3)(i). This program submittal has been reviewed and approved by the Station Nuclear Safety and Operating Committee. Additional supporting documentation resides at our offices for your potential review. A RI-ISI Program was previously approved by the NRC for Surry Unit 1 in December 1998.

Therefore, pursuant to 10 CFR 50.55a(a)(3), the proposed RI-ISI Program attached is provided for your review and approval as an alternative to current ASME Section XI inspection requirements for Class 1 piping. As noted in the attachment, this program will be implemented in accordance with the relief request previously submitted in the December 10, 1999 letter referenced above. It is our intention to complete 100% of the RI-ISI locations over the current third inspection interval by either the current ASME Section XI ISI program or by the proposed RI-ISI Program.

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It should also be noted that we consider implementation of the RI-ISI Program to be a Cost Beneficial Licensing Action.

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

Very truly yours,



Leslie N. Hartz
Vice President - Nuclear Engineering and Services

Commitment made in this letter:

1. This program will be implemented in accordance with the relief request previously submitted in the December 10, 1999 letter referenced above. It is our intention to complete 100% of the RI-ISI locations over the current third inspection interval by either the current ASME Section XI ISI program or by the proposed RI-ISI Program.

cc: U. S. Nuclear Regulatory Commission
Region II
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Mr. R. A. Musser
NRC Senior Resident Inspector
Surry Power Station

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