

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

August 4, 2000

Ms. Brenda J. Shelton, Chief  
Information and Records Management Branch  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555-0001

Serial No.: 00-377  
DEA/DEA R0  
Docket Nos.: 50-280/281  
50-338/339  
License Nos.: DPR-32/37  
NPF-4/7

Dear Ms. Shelton:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**REQUEST FOR EXCEPTION TO 10 CFR 50.4, WRITTEN COMMUNICATIONS**

Pursuant to 10 CFR Part 54, Virginia Electric and Power Company (Virginia Power) will be submitting concurrent applications for the renewal of the operating licenses for Surry and North Anna Power Stations. 10 CFR Part 2, 10 CFR 50.4, and 10 CFR 50.30 provide the requirements for submitting and distributing copies of an application for license renewal. 10 CFR 51.55 contains similar requirements for the Environmental Report, which is required to support the application.

Pursuant to 10 CFR 50.4(c), Virginia Power requests an exception to the 10 CFR 50.4 requirement to provide printed copies in the form of "unglazed paper" when submitting and distributing the applications for renewal of the operating licenses for Surry and North Anna. Alternatively, we seek approval to submit copies on compact disk (CD) medium rather than hard-copy paper as clarified below.

1. 10 CFR 50.4(b)(2)(ii) requires that an applicant submit one signed original and 37 copies to the Nuclear Regulatory Commission, Document Control Desk, one copy to the NRC Region II Office and one copy to the Resident NRC Inspector. We propose to submit the signed original and 40 CD copies to the Nuclear Regulatory Commission, Document Control Desk, one CD copy to the NRC Region II Office and one CD copy to the Resident NRC Inspector at each station.
2. 10 CFR 51.55(a) requires that an applicant submit 41 copies of the Environmental Report to the Director of the Office of Nuclear Reactor Regulation. Since the Environmental Report will be included as an appendix to the License Renewal Application and the NRC's distribution requirements for the technical and environmental information may be different, we propose to meet this requirement through the submittal of the signed original (as indicated above in Item 1) and an additional 40 CD copies.

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3. 10 CFR 2.101(a)(3)(ii) requires that an applicant submit one copy to the chief executive of the municipality or county in which the facility is located. We propose to submit one CD copy to the chief executive of Surry County and one CD copy to the chief executive of Louisa County, unless the recipient specifically requests that a paper copy be provided.
4. 10 CFR 2.101(a)(3)(iii) requires that an applicant make direct distribution of additional copies of the application to federal, state and local officials as instructed by the Director of NRR. 10 CFR 50.30(2) requires that 30 copies of the application be retained for that purpose. 10 CFR 51.55(a) requires that the applicant retain 109 copies of the Environmental Report for distribution to parties and Boards in the NRC proceedings; federal, state and local officials; and any affected Indian tribes, as instructed by the Director of the Office of Nuclear Reactor Regulation. We propose to retain the application in the form of electronic files, which upon request, can be used to readily produce paper or CD copies of the application. However, we plan to provide only CD copies unless the recipient specifically requests that a paper copy be provided.

The CD versions of the facility's application will be in portable document format (PDF). Also included on each CD will be optional installation software that consists of Adobe Acrobat 4 Reader (to access the PDF files), and an ASCII text README file that provides installation information. PDF files on the CDs will be optimized to support internet/intranet byte serving without further processing.

Information on the CDs will not contain any material that is subject to Virginia Power copyright restrictions or information that is exempt from public disclosure. Adobe Acrobat Reader software includes an electronic end-user license agreement that allows unlimited reproduction and distribution of copies to other persons or entities provided the license agreement, copyright notices, and other proprietary notices appearing on or in the software are included with each copy.

The license renewal application for Surry and North Anna is currently scheduled to be submitted by August 1, 2001. To minimize our submittals in paper form, Virginia Power requests approval of this exception by October 1, 2000. If you have any questions regarding this request, please contact Mr. Bill Corbin at (804) 273-2365.

Very truly yours,



W. R. Matthews  
Vice President - Nuclear Operations

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555-0001

Mr. R. A. Musser  
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Surry Power Station

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