VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 2, 2000

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

Serial No. 00-415
NL&OS/GDM:CGL R3
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**
**DOWNGRADE OF SERVICE WATER PIPING AND**
**CHANGE IN COMMITMENT FOR PERMANENT PIPE REPAIR**

In letters dated October 22, 1999, November 19, 1999, and December 10, 1999 (Serial Nos. 99-495, 99-495A and 99-495B, respectively), Virginia Electric and Power Company provided a basis for, as well as requested NRC approval of, relief requests associated with the use of a temporary non-Code repair of an ASME Class 3 pipe. The relief requests addressed a through-wall leak that was discovered on the 30-inch service water (SW) discharge pipe from the 'D' component cooling heat exchanger (CCHX). Specifically, we requested the following approvals:

1) Approval of the initial temporary non-Code pipe repair that was installed in accordance with GL 90-05.

2) Approval to use a more substantial temporary non-Code pipe repair until a permanent Code repair could be implemented during the scheduled Unit 1 Fall 2001 refueling outage. This requested schedule was an extension of the time permitted in the guidance of GL 90-05. The extended use relief request was to permit the implementation of a permanent Code repair in conjunction with other work being performed during the Fall 2001 outage on the SW system.

The NRC approved these two relief requests in letters dated March 1, 2000 and April 26, 2000.

Subsequent to the transmittal of the relief requests and the associated NRC approvals, we reassessed the piping classification for the CCHX SW discharge piping downstream of the last isolation valve before the SW System discharges into the Unit 1 discharge tunnel. This assessment evaluated the design and licensing bases of the piping, determined that the piping does not provide a safety function, and, therefore, concluded

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that the piping is not required to be treated as safety-related (SR) from an inspection, procurement, maintenance, or operational perspective. Consequently, the subject CCHX SW discharge piping has been downgraded from SR to non-safety-related with special quality/regulatory requirements (NSQ) and, thus, is no longer subject to ASME Section XI Code inspection, repair, and replacement criteria. Therefore, the previously approved relief requests noted above are no longer necessary, as a permanent Code repair is no longer required to address the leakage that was the subject of the above relief requests. However, the seismic qualification of the piping will be maintained to: 1) ensure the structural capability of the piping, 2) ensure the integrity of the SR/NSQ boundary, and 3) preclude any significant leakage path.

We are planning to install a permanent non-Code repair on the 'D' CCHX SW discharge line during the scheduled Unit 1 Fall 2001 refueling outage. Because inservice monitoring is appropriate for maintaining the seismic qualification of this piping, it will be subject to augmented inspection requirements that generally conform to the current ASME Section XI requirements for inspection and testing. In addition, the planned SW piping inspection and repair plan activities, requiring the use of a temporary jumper to de-water the Unit 1 discharge tunnel, are still scheduled for the Unit 1 Fall 2001 refueling outage, as noted in our previous letters.

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

Very truly yours,

Leslie N. Hartz
Vice President - Nuclear Engineering and Services

Commitments contained in this letter:

1) The downgraded SW discharge piping will be subject to augmented inspection requirements that generally conform to the current ASME Section XI requirements for inspection and testing.

2) The previous commitment to perform a permanent Code repair has been changed to perform a permanent non-Code repair on the 'D' CCHX SW discharge line during the scheduled Unit 1 Fall 2001 refueling outage.

cc: U. S. Nuclear Regulatory Commission
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