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Docket Nos. 50-280 and 50-281

> Mr. W. L. Stewarts, Vice President - Nuclear Operations Virginia Electric and Power Company Post Office Box 26666 Richmond, Virginia 23261

Dear Mr. Stewartg:

SUBJECT: SURRY POWER STATION, UNIT NOS. 1 AND 2 FIRE PROTECTION - REQUEST FOR EXEMPTION FROM A REQUIREMENT OF APPENDIX R TO 10 CFR PART 50, SECTION III.G

100V 2 4 1982

By letter dated July 23, 1982, you requested exemption from the requirements of Appendix R to 10 CFR Part 50. This exemption from Section III.G.3.b would remove the requirement to install a fixed fire suppression system in the Surry Power Station, Unit Nos. 1 and 2 control room. The Commission has granted this request as described in the enclosed Exemption.

We are still evaluating your request for an exemption from the requirement to install a fixed fire suppression system in the emergency switchgear rooms. The results of this evaluation will be addressed in separate correspondence.

A copy of the Exemption is being filed with the Office of the Federal Register for publication.

Sincerely,

Original signed by: S. A. Varga Steven A. Varga, Chief Operating Reactors Branch #1 Division of Licensing

Enclosure: Exemption

cc w/enclosure: See next page

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Mr. W. L. Stewart Virginia Electric and Power Company

cc: Mr. Michael W. Maupin Hunton and Williams Post Office Box 1535 Richmond, Virginia 23213

> Mr. J. L. Wilson, Manager P. O. Box 315 Surry, Virginia 23883

Donald J. Burke, Resident Inspector Surry Power Station U. S. Nuclear Regulatory Commission Post Office Box 166 Route 1 Surry, Virginia 23883

Mr. Sherlock Holmes, Chairman Board of Supervisors of Surry County Surry County Courthouse, Virginia 23683

Attorney General 1101 East Broad Street Richmond, Virginia 23219

Mr. James R. Wittine Commonwealth of Virginia State Corporation Commission Post Office Box 1197 Richmond, Virginia 23209

Regional Radiation Representative EPA Region III Curtis Building - 6th Floor 6th and Walnut Streets Philadelphia, Pennsylvania 19106 Mr. J. H. Ferguson Executive Vice President - Power Virginia Electric and Power Company Post Office Box 26666 Richmond, Virginia 23261

James P. O'Reilly Regional Administrator - Region II U. S. Nuclear Regulatory Commission 101 Marietta Street, Suite 3100 Atlanta, Georgia 30303

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of VIRGINIA ELECTRIC AND POWER COMPANY (Surry Power Station, Unit Nos. 1 and 2)

Docket Nos. 50-280 and 50-281

EXEMPTION

Ι.

The Virginia Electric and Power Company (the licensee) is the holder of Facility Operating License Nos. DPR-32 and DPR-37 which authorize operation of the Surry Power Station, Unit Nos. 1 and 2. These licenses provide, among other things, that they are subject to all rules, regulations and Orders of the Commission now or hereafter in effect.

The facilities comprise two pressurized water reactors at the licensee's site located in Surry County, Virginia.

Iŀ.

On November 19, 1980, the Commission published a revised Section 10 CFR 50.48 and a new Appendix R to 10 CFR 50 regarding fire protection features of nuclear power plants (45 F.R. 76602). The revised Section 50.48 and Appendix R became effective on February 17, 1981. Section III of Appendix R contains fifteen subsections, lettered A through O, each of which specifies requirements for a particular aspect of the fire protection features at a nuclear power plant. One of these fifteen subsections, III.G., is the subject of this exemption request. III.G specifies detailed requirements for fire protection of the equipment used for safe shutdown by means of separation and barriers (III.G.2). If the requirements for separation and barriers could not be met in an area, alternative safe shutdown capability, independent of that area and equipment in that area, was required (III.G.3). By letter dated

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July 23, 1982, the licensee requested an exemption from the requirements of Section III.G.3b to the extent that it requires the installation of a fixed fire suppression in the control room of Units 1 and 2. In support of this request, the licensee notes that installed hose standpipes provide the best possible fire suppression for these areas and the installation of an automatic fire suppression system in these areas would not enhance fire protection safety above that provided and may be detrimental to overall facility safety.

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III.

We have reviewed the licensee's exemption request. The control room is bounded on all sides by concrete which provides a three hour rated fire barrier. Openings into the room are protected by fire doors, dampers and fire rated penetration seals. The control room contains instrumentation and control equipment necessary to operate the plant under both normal and abnormal conditions.

Control Room fire protection consists of early warning smoke detectors located in adjacent areas, in vertical boards in the control room and at the ceiling near the air flow return. This protection is supplemented by portable fire extinguishers throughout the control room complex and a hose station is located just outside the control room. In addition, the control room is continuously manned. In the event the control room becomes uninhabitable due to smoke or heat, an alternate capability to achieve safe shutdown exists outside the control room.

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For the above reasons, there is reasonable assurance that adequate safe shutdown capability is available in the event of a fire. Therefore, the installation of a fixed fire suppression system will not significantly increase the level of fire protection in the control room, and the exemption requested by the licensee should be granted.

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IV.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, an exemption is authorized by law and will not endanger life or property or common defense and security and is otherwise in the public interest and hereby grants an exemption from the requirements of Section III.G.3b of Appendix R to 10 CFR 50 to the extent that it requires the installation of a fixed fire suppression system in the control room at Surry Power Station, Unit Nos. 1 and 2.

The NRC staff has determined that the granting of this Exemption will not result in any significant environmental impact and that pursuant to 10 CFR \$51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with this action.

FOR THE NUCLEAR REGULATORY COMMISSION

Dar Director Division of Licensing

Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland this 24th day of November, 1982

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