

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 2, 2002

Chief
Rules and Directives Branch
Mailstop T-6D 59
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

Serial No.: 02-284
LR/LTB R0
Docket Nos.: 50-280/281
License Nos.: DPR-32/37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
SURRY POWER STATION UNITS 1 AND 2
LICENSE RENEWAL APPLICATION
RESPONSE TO REQUEST FOR COMMENT ON THE DRAFT PLANT-SPECIFIC
SUPPLEMENT 6 TO THE GENERIC ENVIRONMENTAL IMPACT STATEMENT

In a letter dated March 15, 2002, the NRC provided Virginia Electric and Power Company (Dominion) a draft supplement environmental impact statement (SEIS) regarding license renewal of Surry Power Station, Units 1 and 2. This draft SEIS is the draft plant-specific Supplement 6 to NUREG-1437, Generic Environmental Impact Statement for License Renewal of Nuclear Plants and was provided for review and comment. Attached are our comments on the draft SEIS.

Dominion considers the draft SEIS to be an accurate and factual representation of the environmental conditions associated with plant operation during the license renewal period. Furthermore, we concur with the conclusions of the NRC that any environmental impacts associated with license renewal would be of small significance and that any adverse environmental impacts of license renewal would be smaller than those of other reasonable energy alternatives. Dominion specifically concurs with the NRC's topic discussions and conclusions presented in the draft SEIS.

Should you have any questions regarding this submittal, please contact Mr. J. E. Wroniewicz at (804) 273-2186.

Very truly yours,



David A. Christian
Senior Vice President – Nuclear Operations and Chief Nuclear Officer

Attachment

Commitments made in this letter: None

Template = ADM-013

E-IDS = ADM-03
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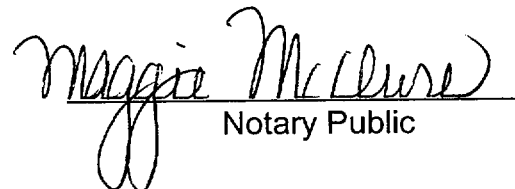
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COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by David A. Christian who is Senior Vice President and Chief Nuclear Officer of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 2nd day of July, 2002.

My Commission Expires: 3-31-04.



Notary Public

(SEAL)

Attachment

**License Renewal – Response to Request for Comment
Draft Plant-Specific Supplement 6 to the GEIS
Serial No. 02-084**

**Surry Power Station, Units 1 and 2
License Renewal Application**

**Virginia Electric and Power Company
(Dominion)**

Section 1.5 Compliance and Consultations

Page 1-9, Line 7:

Draft GEIS Statement:

Table 1-1 indicates that the US Fish & Wildlife Service Migratory Bird Treaty Act Permit expired December 31, 2001.

Dominion Comment:

Depredation Permit Number MB705136-0 was renewed effective 4/22/02, and expires 3/31/03. It is suggested that this update be reflected in Table 1-1.

Section 2.1.3 Cooling and Auxiliary Water Systems

Page 2-7, Lines 25-26:

Draft GEIS Statement:

The statement is made that, "After passing through the condensers, the cooling water enters into a 880-m (2900 ft) discharge tunnel and subsequently flows back into the James River." This implies that the water flows into the river directly from a 2900-foot long tunnel.

Dominion Comment:

The following statement is suggested as a replacement: "After passing through the condensers, the cooling water flows through a tunnel into the head of a 2900-foot discharge canal, and from the canal into the river."

Section 2.2.8.1 Housing

Page 2-27, Line 4:

Draft GEIS Statement:

*It is indicated that approximately **890** permanent employees work at Surry Units 1 and 2.*

Dominion Comment:

It is suggested that the statement reflect about **880** permanent employees as stated in the Environmental Report Page E-3.

Section 2.2.8.2 Public Services

Page 2-31, Lines 28-30:

Draft GEIS Statement:

It is stated that Interstate 95 runs in a north-south direction west of Surry County through the region and connects Richmond to Washington, D.C. to the north and Charlotte, North Carolina to the south.

Dominion Comment:

It is suggested that the following words be replaced for the Charlotte connection: "...and to Emporia, Virginia, leading into North Carolina, to the south."

Section 2.2.8.5 Demography

Page 2-36, Lines 19-21, Page 2-37, Line 12, and Page 2-49, Line 30:

Draft GEIS Statements:

1. *The statement is made, "Table 2-8 shows the actual and estimated changes in population...from 1980 to 2030." This could be interpreted as having actual USCB 2000 numbers, when in fact, they are estimates based on the 1990 census.*
2. *The Source for Table 2-8 is given as **VEPCo 2000c**, and is noted on Page 2-49, Line 30, as "Final Safety Analysis Reports".*

Dominion Comment:

1. It is recommended that the statement noting the population decrease for the century be a separate paragraph unto itself.
2. Contrary to the notation in the GEIS, the source for Table 2-8 is from the reference on Page 2-50, Lines 1-3, and is noted as **VEPCo 2001c**, which is from the Environmental Report, Page 2-30. It is recommended that the Table 2-8 Source be changed to **VEPCo 2001c**. It is also recommended that the Table 2-8 title add the words "..., Based on 1990 Census Data", to clarify the source of the information and

to likewise avoid the implication that the source is 2000 Census Data, noted on Page 2-36, Lines 21-22.

It is also recommended that the title of **VEPCo 2000c** on Page 2-49, Line 30, be changed to "**Updated** Final Safety Analysis Report", which is the complete title of the reference.

Section 4.1.2 Impingement of Fish and Shellfish

Page 4-13, Line 3:

Draft GEIS Statement:

*It is stated, "...at the shoreline (western) end of the dredged intake **canal**,..."*

Dominion Comment:

In the License Renewal Application Environmental Report submitted May 29, 2001, the "intake canal" refers to the canal constructed from the low-level intakes to the high-level intakes. The word "**channel**" refers to the dredged area of the James River that ends at the intake structure, which pumps water into the intake canal. It is suggested that the SEIS replace the word "**canal**" on Page 4-13, Line 3, with the word "**channel**", to be consistent with the usage on Page 2-7, Line 18.

Section 4.1.3 Heat Shock

Page 4-15, Lines 4- 5:

Draft GEIS Statement:

The statement, "The maximum temperature elevation of the water as a result of passing through the condensers....", is a description of a parameter that is not in the existing NPDES permit. The temperature (and conversion) given refers to a delta, and not an actual temperature measurement.

Dominion Comment:

It is recommended that the above statement be deleted, as the information is not pertinent to the NPDES permit, and not included in the Surry License Renewal Application Environmental Report. If the statement is retained, it is suggested that the temperature delta be given as 14°F, as provided in the Dominion resource, *Final Environmental Statement Surry Power Station, May 1972*.

Section 4.4.6 Environmental Justice

Page 4-34, Line 13, Page 4-36, Line 2:

Draft GEIS Statements:

The statement on Page 4-34 and title of Figure 4-2 on Page 4-36 indicate that the low-income population distribution is from Census 2000.

Dominion Comment:

It is Dominion's understanding that the distribution of low-income populations data was not available from Census 2000. The SEIS states on Page 4-26, Line 19, that income data was not available for the 2000 census, so data were used from Census 1990. It is recommended that the statement on Page 4-34, Line 13, and the title of Figure 4-2 on Page 4-36 be changed to attribute the distribution of low-income populations to Census 1990.

Section 5.2.2 Estimate of Risk for Surry Power Station

Page 5-6, Line 6, Page 5-9, Line 40, Page 5-26, Line 34:

Draft GEIS Statement:

On Page 5-6, an RAI is referred to for a VEPCo response on SBO contribution. On Page 5-9, an RAI is referred to for a VEPCo response on external events. On Page 5-26, an RAI is referred to for a NRC question on cost-benefit.

Dominion Comment:

It is suggested that the NRC specify the RAI numbers referred to in the text, in order to correlate the appropriate VEPCo responses.

Section 5.2.6.1 VEPCo Evaluation

Page 5-25, Lines 29-30:

Draft GEIS Statement:

On Page 5-25, it is written that "...a scaling factor of 0.94 was applied to..." Averted Onsite (Power Replacement) Costs (RPC) formulae.

Dominion Comment:

Dominion interprets this description to be incorrect. On Page 4-43 of the License Renewal Application Environmental Report, it states "...the replacement power formula could be reduced by a factor of 0.94, but the generic formula will be conservatively used." Our decision to not apply the 0.94 scaling factor was deliberate and results in conservative cost calculations.