VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 8, 2001

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

Serial No. 01-634A
NL&OS/ETS R0'
Docket No. 50-280
License No. DPR-32

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 1
PROPOSED RISK-INFORMED TECHNICAL SPECIFICATIONS CHANGE
FIVE YEAR EXTENSION OF TYPE A TEST INTERVAL
ADDITIONAL INFORMATION

In an October 15, 2001 letter (Serial No. 01-634), Virginia Electric and Power Company (Dominion) requested an amendment to Facility Operating License Number DPR-32 in the form of a change to the Technical Specifications for Surry Power Station Unit 1. The proposed change will permit a one-time five-year extension of the ten-year performance based Type A test interval established in NEI 94-01, "Nuclear Energy Institute Industry Guideline For Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," Revision 0, July 26, 1995.

In an October 24, 2001 telephone conference call, the NRC staff requested clarification of past Type A test results presented in the discussion of change for the proposed Technical Specification change. Clarification is provided by revision of the table and associated footnotes of the Type A test results in the discussion of change. Please substitute the attached revised page five of the discussion of the change to complete your review.

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

Very truly yours,

Leslie N. Hartz
Vice President – Nuclear Engineering

Commitments made is this letter: None

Rec'd DCD 7/16/02

A017

Attachment

cc: U.S. Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Suite 23 T85
Atlanta, Georgia 30303

Mr. R. A. Musser
NRC Senior Resident Inspector
Surry Power Station

Commissioner
Bureau of Radiological Health
1500 East Main Street
Suite 240
Richmond, VA 23218

SN: 01-634A
Docket No.: 50-280
Subject: Proposed R-I TS Change
Five-Year Ext. of Type A Test Interval

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Leslie N. Hartz, who is Vice President - Nuclear Engineering, of Virginia Electric and Power Company. She has affirmed before me that she 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 her knowledge and belief.

Acknowledged before me this 8th day of November, 2001.

My Commission Expires: March 31, 2004.

Maggie D. McClure
Notary Public

(SEAL)

Attachment

Discussion of Change -
Revised Page Five

Surry Power Station Unit 1
Virginia Electric and Power Company
(Dominion)

from a once-per-ten-years to a once-per-fifteen-years is 4.37 x 10^{-8}/yr. Since guidance in Reg. Guide 1.174 defines very small changes in LERF as below 10^{-7}/yr, increasing the ILRT interval from ten to fifteen years is therefore, considered non-risk significant. The calculation is included as an attachment to this Technical Specification change request.

- The one-time change to the Type A test interval from ten years to fifteen increases the risk of those associated specific accident sequences by 0.001%. In addition, the risk impact on the total integrated (fifteen year increase) plant risk above baseline, for those accident sequences influenced by Type A testing is only 0.004%. Therefore, the risk impact when compared to other severe accident risks is negligible.

10 CFR 50 *Appendix J, Option B Integrated Leak Test Information:*

A Type A test can detect containment leakage due to a loss of structural capability. All other sources of containment leakage detected in Type A test analyses can be detected by the Type B and C tests.

Previous Type A tests confirmed that the Surry Unit 1 reactor containment structure has extremely low leakage and represents an insignificant potential risk contributor to increased containment leakage. The increased leakage is minimized by continued Type B and Type C testing for penetrations with direct communication with containment atmosphere. Also, the In-Service Inspection (ISI) program and maintenance rule program require periodic inspection of the interior and exterior of the containment structure to identify degradation.

The results for the last two Type A test are reported in the following table for Surry Unit 1:

Date	As Found Leakage(*)	Acceptance Limit(**)	Test Pressure (psia)
April 23, 1992	0.396 L_a	1.0 L_a	44.46
June 26, 1988	0.5055 L_a	1.0 L_a	44.46

* This is the leakage attributable to containment leakage as well as a number of Type B and Type C leakage components being tested as part of the Type A test.

** The total allowable "as-left" leakage is 0.75 L_a (L_a = 0.1% of primary containment air by weight per day and is the leakage assumed in dose consequences), with 0.6 L_a, the maximum leakage from Type B and C components.