

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

Re: 10 CFR 2.202

February 28, 2003

Secretary, Office of the Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
ATTN: Rulemaking and Adjudications Staff  
Washington, D.C. 20555-0001

Serial No.: 03-142  
NL&OS/ETS  
Docket Nos.: 50-280  
50-281  
License Nos.: DPR-32  
DPR-37

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**ANSWER TO ORDER FOR INTERIM INSPECTION REQUIREMENTS FOR**  
**REACTOR PRESSURE VESSEL HEADS AT PRESSURIZED WATER REACTORS**  
**DATED FEBRUARY 11, 2003**

On February 11, 2003, the Nuclear Regulatory Commission (NRC) issued an Order for Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors licensees. The Order requires specific inspection of the reactor pressure vessel (RPV) head and associated penetration nozzles at pressurized water reactors (PWRs). The Commission stated that the actions in the Order are interim measures, necessary to ensure that licensees implement and maintain appropriate measures to inspect and, as necessary, repair RPV heads and associated penetration nozzles. The Order required that licensees immediately start implementation of the requirements of the Order and respond to specific actions within twenty (20) days of the date of the Order.

In accordance with Section V of the Order and 10 CFR 2.202, Virginia Electric and Power Company (Dominion) hereby submits its answer to the Order. Dominion consents to the Order as described in Section IV and does not request a hearing.

Currently, the Surry Units 1 and 2 replacement RPV heads are being designed to operate without thermal sleeves in the penetration nozzles. If thermal sleeves are required to be installed, 100 percent inspection coverage of the penetration nozzle base material in the area of the weld and above the J-groove weld may not be obtainable as required by Section IV.C(3)(b) of the Order. If thermal sleeves are installed, the exact

limitation on coverage cannot be established until the first inspections required by the Order are performed. If 100 percent coverage of the area of interest cannot be obtained during inspection of the penetration nozzles, Dominion will seek relaxation from the inspection requirements in Section IV.C(3)(b) of the Order at that time.

If you have any questions, please contact Mr. Thomas Shaub at (804) 273-2763.

Very truly yours,



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

Commitments made in this letter: None

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

Mr. Samuel J. Collins, Director  
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NRC Senior Project Manager  
Surry Power Station

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

Serial No.: 03-142

Docket Nos.: 50-280/281

Surry Response to RPV Head and Penetration Nozzles Inspection Order (EA-03-009)

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 – Nuclear Operations 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 28<sup>TH</sup> day of February, 2003.

My Commission Expires: May 31, 2006.

Vicki L. Huel  
Notary Public

