VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 7, 2004

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

Serial No. 04-506
NL&OS/GDM R3
Docket Nos. 50-280/281
License Nos. DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
SURRY POWER STATION UNITS 1 AND 2
INSERVICE TESTING (IST) PROGRAM FOR PUMPS AND VALVES
CHECK VALVE CONDITION MONITORING PROGRAM
EXTENSION OF SURRY UNIT 2 IST PROGRAM THIRD TESTING INTERVAL

The purpose of this letter is to inform the NRC that Surry Power Station will implement a check valve condition monitoring program in accordance with the ASME OM Code ISTC, Appendix II, for the fourth interval of the Inservice Testing (IST) programs for Units 1 and 2. Also, Surry Power Station has extended the third interval for the Unit 2 IST program from May 10, 2004 to May 10, 2005. The fourth interval for Unit 2 will start on May 10, 2005. Surry Power Station started the fourth interval for the Unit 1 IST program on May 10, 2004. The ASME OM Code edition and addenda effective for the fourth interval for both Surry Units 1 and 2 is the 1998 Edition, the 1999 Addenda and the 2000 Addenda.

The Surry Units 1 and 2 fourth interval IST programs will comply with Appendix II, "Check Valve Condition Monitoring Program," of the ASME OM Code, Subsection ISTC, as an alternative to the requirements of ISTC-3510, ISTC-3520, ISTC-3540 and ISTC-5221, and subject to the following provisions and limitations. According to the Code of Federal Regulations, 10CFR50.55a(b)(3)(iv),

> "*Appendix II.* Licensees applying Appendix II, "Check Valve Condition Monitoring Program," of the OM Code, 1995 Edition with the 1996 and 1997 Addenda, shall satisfy the requirements of paragraphs (b)(3)(iv)(A), (b)(3)(iv)(B), and (b)(3)(iv)(C) of this section. Licensees applying Appendix II, 1998 Edition through the latest edition and addenda incorporated by reference in paragraph (b)(3) of this section, shall satisfy the requirements of paragraphs (b)(3)(iv)(A), (b)(3)(iv)(B), and (b)(3)(iv)(D) of this section.
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> (A) Valve opening and closing functions must be demonstrated when flow testing or examination methods (nonintrusive, or disassembly and inspection) are used.

(B) The initial interval for tests and associated examinations may not exceed two fuel cycles or 3 years, whichever is longer; any extension of this interval may not exceed one fuel cycle per extension with the maximum interval not to exceed 10 years; trending and evaluation of existing data must be used to reduce or extend the time interval between tests.

(C) If the Appendix II condition monitoring program is discontinued, then the requirements of ISTC 4.5.1 through 4.5.4 must be implemented.

(D) The provisions of ISTC-3510, ISTC-3520, and ISTC-3540 in addition to ISTC-5221 must be implemented if the Appendix II condition monitoring program is discontinued."

The Surry Unit 2 third interval IST program complies with the ASME Code Section XI, 1989 Edition, which invokes OMa-1988 Addenda, Part 6, for pump testing and Part 10 for valve testing. The third interval for Unit 2 was extended by one year (from May 10, 2004 to May 10, 2005) as allowed by Section XI 1989 Edition, Subsection IWA, paragraph IWA-2430(d). IWA-2430(d) states:

"For components inspected under Program B, each of the inspection intervals may be extended or decreased by as much as 1 year. Adjustments shall not cause successive intervals to be altered by more than 1 year from the original pattern of intervals."

Surry Power Station uses Inspection Program B which divides the original 40-year life of the plant into four 10-year intervals as defined in IWA-2432. The third interval was extended to provide sufficient time for the determination of appropriate test measures to meet new ASME OM Code requirements imposed on the fourth interval IST program.

If you have any questions or require additional information, please contact Mr. Gary Miller at (804) 273-2771.

Very truly yours,

L. N. Hartz
Vice President – Nuclear Engineering

Commitment made in this letter:

1. Surry Power Station will implement a check valve condition monitoring program in accordance with the ASME OM Code ISTC, Appendix II, for the fourth interval of the Inservice Testing (IST) Programs for Surry Units 1 and 2.

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