

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 29, 2004

10 CFR 50.55a

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Serial No. 04-554
NL&OS/GDM R0
Docket No. 50-280
License No. DPR-32

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 1
FOURTH INTERVAL INSERVICE INSPECTION PROGRAM
WITHDRAWAL OF RELIEF REQUEST SPT-001

In a letter dated December 12, 2002 (Serial No. 02-642) Virginia Electric and Power Company (Dominion) submitted the Surry Unit 1 inservice inspection (ISI) program for the fourth ISI interval for Class 1, 2, and 3 components and component supports. That submittal included several relief requests for NRC review and approval including Relief Request SPT-001 associated with Class 1 pressure retaining components.

Specifically, Relief Request SPT-001 requested approval to perform the Class 1 system leakage test without the erection of temporary scaffolding to satisfy the ASME Section XI Code examination requirements. As an alternative, we stated that existing permanent structures, platforms or ladders would be used to the extent practical to gain access to the surface to be examined. The required visual examination would be performed from the access afforded by these structures, ladders or platforms to the extent practical. Any examination surface that could not be accessed per the requirements of the Code or to the maximum qualified distance would be considered "inaccessible". As such, the surrounding area (including floor areas or accessible equipment surfaces located underneath the inaccessible components) would be examined for leakage as required by paragraphs IWA-5241 (b) or IWA-5242 (b) of the Code.

Dominion submitted a similar Relief Request SPT-001 as part of the Surry Unit 2 fourth interval ISI program in a letter dated August 25, 2003 (Serial No. 03-428). The NRC provided a safety evaluation for the relief requests included in the Surry Unit 2 fourth interval ISI program submittal in their letter dated September 9, 2004. With regard to Relief Request SPT-001, the NRC stated the following in that letter:

"The NRC staff determined that erection of temporary scaffolding is an activity that is not within the scope of Section XI of the ASME Code (Section XI) and that acceptable provisions for visual VT-2 examinations of inaccessible ASME Code Class components have been established in Paragraph IWA-5241(b) of ASME,

Section XI. The NRC staff therefore concludes that VEPCO's requested relief is unnecessary and that the licensee should continue to apply the requirements of IWA-5421(b) for VT-2 examinations of inaccessible ASME Code Class components."

Since the NRC has determined that Relief Request SPT-001 is not necessary for the Surry Unit 2 fourth interval ISI program, it therefore follows that similar relief is not necessary for Surry Unit 1 either. Consequently, Dominion hereby withdraws Relief Request SPT-001, previously included in the Surry Unit 1 fourth interval ISI program submittal, as it has been concluded that such relief is unnecessary.

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

Very truly yours,



Eugene S. Grecheck
Vice President – Nuclear Support Services

Commitments made in this letter: None.

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