

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

**SAFEGUARDS INFORMATION**

October 1, 2004

Re: 10 CFR 2.202  
10 CFR 50.4

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

Serial No.: 04-594  
NL&OS/MAE: R1  
Docket Nos.: 50-280/281  
License Nos.: DPR-32/37

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**  
**10 CFR 73.55(e)(1) COMPLIANCE PHYSICAL SECURITY PLAN**

The NRC issued an Order dated April 29, 2003, Requiring Compliance with Revised Design Basis Threat ("Order EA-03-086") and other security related Orders (collectively "Orders") for the Millstone, North Anna and Surry Power Stations. Dominion Nuclear Connecticut, Inc. (DNC) and Virginia Electric and Power Company (Dominion) responded to Order EA-03-086 and the other security related Orders (dated February 25, 2002, January 7, 2003 and April 29, 2003) by submission of the Physical Security Plan, the Contingency Plan and the Training and Qualification Plan which was transmitted in an April 26, 2004 letter (Serial No. 04-242). The NRC issued requests for additional information (RAIs) related to the Physical Security Plan, Safeguards Contingency Plan and Training and Qualification Plan in letters dated June 21, 2004, June 25, 2004, July 9, 2004, July 23, 2004, and September 10, 2004. DNC and Dominion responded to these RAIs in letters dated July 1, 2004, July 8, 2004, two dated July 19, 2004, August 4, 2004, August 10, 2004, August 23, 2004, and September 28, 2004 (Serial Nos. 04-395, 04-400, 04-400A, 04-429, 04-400B, 04-463, 04-504, and 04-580 respectively). DNC and Dominion resubmitted the Physical Security Plan, Safeguards Contingency Plan and Training and Qualification Plan in a letter dated September 9, 2004 (Serial No. 04-242A). A request for a schedule extension to complete implementation of the Order was submitted on September 20, 2004.

The NRC faxed an RAI to the Surry Power Station NRC Resident Inspector regarding Surry's compliance with 10 CFR 73.55(e)(1) on September 17, 2004. This RAI was clarified by NRC representatives in a September 21, 2004 meeting. The clarified RAI and response are attached.

**NOTE: THE ATTACHMENT CONTAINS "SAFEGUARDS INFORMATION" AND MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF THE ATTACHMENT, THIS PAGE IS "DECONTROLLED."**

**SAFEGUARDS INFORMATION**

\* NSIROS

Because of the requirement for these plans to be fully implemented by October 29, 2004; the need to integrate the requirements of the revised DBT Order with the Orders issued February 25, 2002, January 7, 2003, and April 29, 2003; and the Commission's determination that it would be appropriate to exercise enforcement discretion to accommodate any transitional issues which may arise as licensees, in good faith, take reasonable actions to implement the specific requirements of the Orders, DNC and Dominion request that enforcement discretion continue to be exercised during the transition period until full implementation of the plans is accomplished and the physical plant modifications and security force training are complete. At that time, the revised plans will be fully implemented and the exercise of enforcement discretion will no longer be necessary.

The attached material contains Safeguards Information as defined by 10 CFR 73.21 and its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended.

If you have any questions, please contact Ms. Margaret Earle at 804-273-2768.

Very truly yours,



Eugene S. Grecheck  
Vice President – Nuclear Support Services

Attachment: Response to Request for Additional Information, 10 CFR 73.55(e)(1)  
Compliance (Safeguards Information)

Commitments: The Plans will be revised after all the RAIs related to the Plans are resolved.



cc: Director of Nuclear Security (w/o Attachment)  
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Secretary, Office of the Secretary of the Commission (w/o Attachment)  
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Director, Office of Nuclear Reactor Regulation (w/o Attachment)  
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Assistant General Counsel for Materials Litigation and Enforcement  
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NRC Senior Resident Inspector  
Surry Power Station