

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

November 15, 2004

10 CFR 50.69 (Draft)

United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20005

Serial No. 04-006A  
NL&OS/GDM R1  
Docket Nos. 50-280, 281  
License Nos. DPR-32, 37

**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**  
**SURRY POWER STATION UNITS 1 AND 2**  
**PILOT APPLICATION FOR IMPLEMENTATION OF REGULATORY GUIDE (RG)**  
**1.200 – REVISED SCHEDULE**

In a letter dated January 21, 2004 (Serial No. 04-006), Dominion informed the Nuclear Regulatory Commission (NRC) of our intent to be an industry pilot plant for the implementation of Regulatory Guide (RG) 1.200, *An Approach for Determining the Technical Adequacy of PRA Results for Risk-Informed Activities*. We noted that the Dominion pilot program would implement, as a Westinghouse Owners Group pilot, the proposed 10 CFR 50.69 categorization process at Surry Power Station and would utilize draft regulatory guide DG-1121, *Guidelines for Categorizing Structures, Systems, and Components in Nuclear Power Plants According to Their Safety Significance*; NEI 00-04, *10 CFR 50.69 SSC Categorization Guideline*; and ASME Code Case N-660, *Risk-Informed Safety Classification for Use in Risk-Informed Repair/Replacement Activities, Section XI, Division 1*.

As we noted in the letter referenced above, the intent of the Dominion pilot program, including NRC review, is to identify and resolve any potential generic issues in implementing the proposed rule, as well as:

- Provide a final trial use of categorization methodologies,
- Gain experience in defining high-level treatment requirements required by the proposed rule,
- Facilitate the finalization of Regulatory Guide 1.200, and
- Reduce uncertainties related to NRC review and approval of plant specific applications.

We previously noted that, as part of the pilot program, Dominion planned to submit a license amendment request for Surry Power Station Units 1 and 2 requesting NRC approval to implement the risk-informed categorization process for selected systems. We originally planned to submit the license amendment request by June 30, 2004, and request NRC approval of the license amendment by December 31, 2004 in support of the overall risk-informed regulation effort. However, several factors have precluded

Dominion's ability to submit a license amendment in accordance with the previously provided schedule. Specifically, NRC rulemaking on 10 CFR 50.69 has been delayed such that revision of the statements of consideration and the associated Regulatory Guide 1.201 (currently DG-1121) could potentially extend into the first quarter of 2005. Consequently, Dominion cannot submit a license amendment request until the rule is final and all regulatory guidance has been issued.

It is our understanding that the NRC schedule for completion of the associated Regulatory Guide 1.200 pilot on probabilistic risk assessment (PRA) quality has also been delayed. We understand that this is due, in part, to the additional time required by NRC staff to define and address public comments on staff positions regarding the various consensus PRA standards, particularly the ANS External Hazards Standard in Appendix C of Regulatory Guide 1.200. As a result, the associated Advisory Committee on Reactor Safeguards meeting to discuss Regulatory Guide (RG) 1.200, Appendix C, has been postponed from November 15, 2004 to February 2005. It is our understanding that the NRC schedule to issue a final Regulatory Guide 1.200 with Appendices A and B (and Appendix C for trial use) is now the end of 2005. Consequently, it appears that the schedule for Dominion's submittal can be postponed to early 2005 without impacting the overall NRC schedule for the pilot. Furthermore, unanticipated work in response to emergent industry issues has independently limited the availability of Dominion PRA resources to prepare for the NRC RG 1.200 PRA quality inspection.

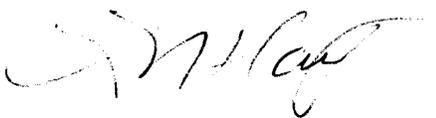
Based on the above information, Dominion's revised schedule for the submittal of information as a pilot plant in support of implementation of RG 1.200 is as follows:

- Submit information supporting Surry PRA quality in advance of a pilot program NRC inspection – January 31, 2005, and
- Submit a license amendment request to implement the 10 CFR 50.69 categorization process/RG 1.200 program for Surry – June 30, 2005.

These proposed schedule changes have been previously discussed with the NRC staff.

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

Very truly yours,



L. N. Hartz  
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Commitments included in this correspondence: None

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