VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

February 21, 2005

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

Serial No. 04-666A
NL&OS/ETS R0
Docket Nos. 50-280, 281
License Nos. DPR-32, 37

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
SURRY POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATIONS CHANGE REQUEST
RELOCATION OF INSERVICE INSPECTION AND TESTING REQUIREMENTS
REPLACEMENT PAGES

In a letter dated November 4, 2004 (Serial No. 04-666), Dominion requested an amendment to Facility Operating License Numbers DPR-32 and DPR-37 in the form of changes to the Technical Specifications (TS) for Surry Power Station Units 1 and 2. The proposed changes will relocate the inservice testing requirements, remove the inservice inspection requirements, and establish a Bases Control Program consistent with Improved Technical Specifications.

Subsequent to the submittal, it was identified that an incorrect TS section reference and minor typographical errors were included in page 4 of 8 of the Discussion of Change section in Attachment 1 to the letter. It was also noted that the proposed TS Section 6.4.I, Inservice Testing Program, on TS page 6.4-6 in Attachment 3 was not consistent with the changes specified in both the Discussion of Change (page 3 of 8, Attachment 1) and the marked-up TS pages (Insert A, Attachment 2). Therefore, please replace page 4 of 8 in Attachment 1 and proposed TS page 6.4-6 in Attachment 3 of our November 4, 2004 submittal with the corrected pages provided in the attachment to this letter. These changes are administrative in nature and therefore do not affect the No Significant Hazards Consideration Determination or the Environmental Assessment included in the original submittal.

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

Very truly yours,

Leslie N. Hartz
Vice President – Nuclear Engineering

Attachment

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission
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Technical Specifications Change - IST, ISI and Bases Control Program

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Leslie N. Hartz who is Vice President – Nuclear Engineering of Virginia Electric and Power Company. She has affirmed before me that she 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 her knowledge and belief.

Acknowledged before me this 21st day of February, 2005.

My Commission Expires: May 31, 2006.

Vicki L. Hull
Notary Public

(SEAL)

Attachment

Replacement Pages for Virginia Electric and Power Company Letter to USNRC dated November 4, 2004 (Serial No. 04-666)

- **Page 4 of 8, Attachment 1, Discussion of Change**
- **Proposed TS Page TS 6.4-6, Attachment 3**

Surry Power Station Units 1 and 2
Virginia Electric and Power Company
(Dominion)

3. The provisions of TS 4.0.3 are applicable to inservice testing activities; and

4. Nothing in the ASME Code for Operation and Maintenance of Nuclear Power Plants shall be construed to supersede the requirements of any TS.

The frequencies identified in the table above are those identified in the ASME Code for Operation and Maintenance of Nuclear Power Plants.

The following TS are revised to refer to the Inservice Testing Program in place of TS 4.0.5:

- ✓ TS 4.1.B.1 – Pressurizer PORVs and Block Valves
- ✓ TS Table 4.1-2A Item 4 – Pressurizer Safety Valves
- ✓ TS Table 4.1-2A Item 5 – Main Steam Safety Valves
- ✓ TS 4.5.A.1 – Containment Spray Pumps
- ✓ TS 4.5.A.2 – Containment Spray Valves
- ✓ TS 4.5.B.1 – Recirculation Spray Pumps
- ✓ TS 4.5.B.2 – Recirculation Spray Valves
- ✓ TS 4.8.A.2.a – AFW Valves
- ✓ TS 4.8.A.3.a – AFW Pumps
- ✓ TS 4.8.A.5.b – AFW Cross Connect Valves
- ✓ TS 4.11.C.1 – Safety Injection Subsystem Low Head Pumps
- ✓ TS 4.11.C.2 – Safety Injection Subsystem Charging Pumps
- ✓ TS 4.11.C.3 – Safety Injection Subsystem Valves

- The following TS are revised to eliminate reference to ASME Section XI. Section XI is no longer the appropriate ASME Code of reference for the Inservice Testing Program.

  - ✓ TS 4.8.B – Acceptance Criteria

- The following TS are revised due to the removal of the ISI program requirements from the TS:

  - ✓ TS 4.2.A – Augmented Inspections
  - ✓ TS Table 4.2-1
    - ◘ Item 2.1.1 both examination requirements and frequency
    - ◘ Item 2.1.2 both examination requirements and frequency
    - ❑ Item 2.1.3 both examination requirements and frequency
  - ✓ TS 4.17 – Shock Suppressors (Snubbers)

Section XI continues to be referenced in TS 4.2 as it relates to the examination methods and frequency of the augmented inspections.

H. Practice of site evacuation exercises shall be conducted annually, following emergency procedures and including a check of communications with off-site report groups.

I. Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

1. Testing frequencies specified in the ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda as follows:

ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Quarterly or every 3 months	At least once per 92 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days
Every 4 years	At least once per 1461 days
Every 5 years	At least once per 1827 days
Every 8 years	At least once per 2922 days
Every 10 years	At least once per 3653 days
Once per fuel cycle (18 months)	At least once per 549 days
Every cold shutdown	Every cold shutdown
Every refueling outage	Every refueling outage

2. The provisions of TS 4.0.2 are applicable to the above required Frequencies for performing inservice testing activities;

3. The provisions of TS 4.0.3 are applicable to inservice testing activities; and

4. Nothing in the ASME Code for Operation and Maintenance of Nuclear Power Plants shall be construed to supersede the requirements of any TS.

J. Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

1. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.