

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 2, 2005

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

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

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

In a letter dated November 4, 2004 (Serial No. 04-666) and supplemented on February 21, 2005 (Serial No. 04-666A), 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 (IST) requirements, remove the inservice inspection (ISI) requirements, and establish a Bases Control Program consistent with Improved Technical Specifications. In a telephone conference call on May 19, 2005, the NRC requested elimination of the IST frequencies identified in the proposed amendment that were greater than two years to maintain consistency with the approved inservice testing frequencies in improved standard technical specifications.

These specific IST frequencies (i.e., 4 years, 5 years, 8 years, and 10 years) were incorporated into TS 6.4.1, "Inservice Testing Program," to identify all the test frequencies used in the ASME OM Code, 1998 Edition, 2000 Addenda. However, the NRC has not approved the use of the twenty-five percent grace period provided in standard technical specifications (Surry's TS 4.0.2) for testing frequencies greater than two years. Therefore, as requested by the NRC, the frequencies of 4 years, 5 years, 8 years, and 10 years are being withdrawn for the proposed license amendment. This revision to the amendment request does not affect the outcome of the significant hazards consideration or environmental assessment performed to support the original November 4, 2004 amendment request.

Revised, marked-up and proposed pages, which reflect the removal of the testing frequencies greater than 2 years, are provided in the attachment to this letter. Please replace the pages in the initial request with the attached pages to complete your review of the proposed license amendment.

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

Very truly yours,



Eugene S. Grecheck
Vice President – Nuclear Support Services

Attachment

Commitments made in this letter:

1. No regulatory commitments are made in this letter.

cc: U.S. Nuclear Regulatory Commission
Region II
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Atlanta, GA 30303

Commissioner
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COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President – Nuclear Support Services, of Virginia Electric and Power Company. He has affirmed before me that he 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 his knowledge and belief.

Acknowledged before me this 2nd day of June, 2005.

My Commission Expires: MAY 31, 2006.

Vicki L. Hull
Notary Public

(SEAL)

Attachment

Serial No. 04-666B

**Revision to Proposed Technical Specifications Change Request
Relocation of Inservice Inspection and Testing Requirements**

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

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. Deleted: ADD IST PROGRAM (INSERT A)

J. Deleted. ADD TS BASES CONTROL PROGRAM (INSERT B)

K. Systems Integrity

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

Insert A

6.4.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
Quarterly or every 3 months
Yearly or annually
Biennially or every 2 years
Once per fuel cycle (18 months)
Every cold shutdown
Every refueling outage

Required Frequencies for performing inservice testing activities
At least once per 92 days
At least once per 366 days
At least once per 731 days
At least once per 549 days
Every cold shutdown
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.

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
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.