VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 5, 2006

10 CFR 50.54(f)

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Serial No. 06-490
NL&OS/GDM R0
Docket Nos. 50-280/281
License Nos. DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NRC BULLETIN 2002-01 - REACTOR PRESSURE VESSEL HEAD DEGRADATION AND REACTOR COOLANT PRESSURE BOUNDARY INTEGRITY
SUPPLEMENTAL RESPONSE

On March 18, 2002, the Nuclear Regulatory Commission (NRC) issued Bulletin 2002-01, "Reactor Pressure Vessel Head Degradation and Reactor Coolant Pressure Boundary Integrity." The bulletin required licensees to submit their basis for concluding that their boric acid inspection programs provide reasonable assurance of compliance with the applicable regulatory requirements discussed in Generic Letter 88-05 and within the bulletin. Virginia Electric and Power Company (Dominion) provided a description of its boric acid corrosion control program for Surry Power Station in letters dated May 16, 2002 (Serial No. 02-168A) and January 31, 2003 (Serial No. 02-689). In those letters, Dominion provided a discussion of the enhanced boric acid corrosion control (BACC) program that was being implemented for Surry Power Station. We also stated that "ASME Class 1 bolted connections and Alloy 600 tubing and Alloy 82/182 weldments will be inspected every refueling outage," and included a list of Alloy 600 tubing locations in tables that were provided in the January 31, 2003 letter based on Westinghouse data from original construction. We subsequently identified additional components, i.e., resistance temperature detector (RTD) thermowells that were fabricated from Inconel Alloy 600 and installed with Alloy 82/182 seal welds, which were incorporated into the BACC program. The NRC was advised of this addition in a Dominion letter dated January 5, 2004 (Serial No. 02-689A).

Dominion has recently identified that a certain number of the Surry incore flux thimble tubes are also fabricated of Alloy 600; however, these thimble tubes were not identified in the information previously submitted to the NRC in response to NRC Bulletin 2002-01 for Surry Power Station. Although the thimble tubes were not specifically mentioned in the previous BACC program correspondence, the program inspection procedures nevertheless include inspection of the thimble tubes that are sufficient to verify that reactor coolant system (RCS) leakage is not occurring. Specifically, BACC program inspection procedures require inspection of the bolted connections of the flux thimble

tubes at the seal table every refueling outage for evidence of RCS leakage. Furthermore, independent of the BACC program, the flux thimble tubes are currently volumetrically inspected for wear every other refueling outage. The inspection frequency is based on previous inspection results. These inspections satisfy ASME Code requirements, as well as current regulatory requirements, and would identify RCS leakage should it occur. BACC program inspection procedures will be revised to specifically identify the Alloy 600 flux thimble tubes. It should be noted that the current inspection program for the flux thimble tubes was previously communicated to the NRC in a letter dated July 8, 1991 (Serial No. 88-515C) in response to NRC Bulletin 88-09, "Thimble Tube Thinning in Westinghouse Reactors," and the program was approved by the NRC in a letter dated August 8, 1991.

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

Very truly yours,

E. S. Grecheck
Vice President - Nuclear Support Services

Commitment made in this letter:

1. BACC program inspection procedures will be revised to specifically identify the Surry Alloy 600 flux thimble tubes.

cc: U. S. Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth St., SW, Suite 23 T85
Atlanta, Georgia 30303-8931

Mr. N. P. Garrett
NRC Senior Resident Inspector
Surry Power Station

Mr. R. A. Smith
Authorized Nuclear Inspector
Surry Power Station

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 5th day of July, 2006.

My Commission Expires: August 31, 2008.

Margaret B. Bennett
Notary Public

(SEAL)