

August 10, 2006

Mr. David A. Christian
Senior Vice President and Chief Nuclear Officer
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: SURRY POWER STATION, UNIT NOS. 1 AND 2 - ISSUANCE OF
AMENDMENTS REGARDING THE REDEFINITION OF THE EXCLUSION
AREA BOUNDARY (TAC NOS. MC8315 AND MC8316)

Dear Mr. Christian:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 249 to Renewed Facility Operating License No. DPR-32 and Amendment No. 248 to Renewed Facility Operating License No. DPR-37 for the Surry Power Station, Unit Nos. 1 and 2, respectively. The amendments change the Technical Specifications (TSs) in response to your application dated September 13, 2005, as supplemented by letters dated April 7 and May 23, 2006.

These amendments revise Technical Specification 5.1, "Site," to redefine the exclusion area boundary as the site boundary.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Stephen Monarque, Project Manager
Project Directorate II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosures:

1. Amendment No. 249 to DPR-32
2. Amendment No. 248 to DPR-37
3. Safety Evaluation

cc w/encls: See next page

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Package No. ML062220140
Amendment No. ML062220194
Tech Spec No. ML

*Date of memo transmitting safety evaluation

OFFICE	NRR/LPL2-1/PM	NRR/LPL2-1/LA	NRR/AADB/BC	OGC	NRR/LPL2-1/BC
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VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-280

SURRY POWER STATION, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 249
Renewed License No. DPR-32

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company (the licensee) dated September 13, 2005, as supplemented by letters dated April 7 and May 23, 2006, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Renewed Facility Operating License No. DPR-32 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 249, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Evangelos C. Marinos, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to License No. DPR-32
and the Technical Specifications

Date of Issuance: August 10, 2006

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-281

SURRY POWER STATION, UNIT NO. 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 248
Renewed License No. DPR-37

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company (the licensee) dated September 13, 2005, as supplemented by letters dated April 7 and May 23, 2006, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Renewed Facility Operating License No. DPR-37 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 248, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Evangelos C. Marinos, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes License No. DPR-37
and the Technical Specifications

Date of Issuance: August 10, 2006

ATTACHMENT

TO LICENSE AMENDMENT NO. 249

RENEWED FACILITY OPERATING LICENSE NO. DPR-32

DOCKET NO. 50-280

AND

TO LICENSE AMENDMENT NO. 248

RENEWED FACILITY OPERATING LICENSE NO. DPR-37

DOCKET NO. 50-281

Replace the following pages of the Licenses and the Appendix A Technical Specifications (TSs) with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

License

License No. DPR-32, page 3
License No. DPR-37, page 3

TSs

5.1-1

Insert Pages

License

License No. DPR-32, page 3
License No. DPR-37, page 3

TSs

5.1-1

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 249 TO
RENEWED FACILITY OPERATING LICENSE NO. DPR-32
AND
AMENDMENT NO. 248 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-37
VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-280 AND 50-281

1.0 INTRODUCTION

By letter dated September 13, 2005, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML052560549), as supplemented by letters dated April 7 (ADAMS Accession No. ML061000741), and May 23, 2006 (ADAMS Accession No. ML061430480), Virginia Electric and Power Company (the licensee) submitted a request for changes to the Surry Power Station, Unit Nos. 1 and 2 (Surry 1/2), Technical Specifications (TSs). The requested changes would revise TS 5.1, "Site," to redefine the exclusion area boundary (EAB) as the site boundary. The licensee also recalculated its design basis accident 0–2 hour EAB atmospheric dispersion factor (χ/Q value) based on the revised EAB and proposed the resulting lower 0–2 hour EAB χ/Q value as an approved change to its dose assessment methodology. A reduced 0–2 hour EAB χ/Q value would, in turn, reduce the calculated EAB dose consequences for the Updated Final Safety Analysis Report (UFSAR) Chapter 14 accidents in future re-analyses.

The April 7 and May 23, 2006, supplements contained clarifying information only and did not change the initial proposed no significant hazards consideration determination or expand the scope of the initial application.

2.0 REGULATORY EVALUATION

The EAB acceptance criteria are based on meeting the relevant requirements of Title 10 of the *Code of Federal Regulations* (10 CFR), Part 100, "Reactor Site Criteria." Pursuant to 10 CFR 100.11(a),¹ power reactor sites must have an exclusion area which is defined in 10 CFR 100.3 as an area surrounding the reactor in which the reactor licensee has the authority to determine all activities, including exclusion or removal of personnel and property

¹The applicability of 10 CFR 100.11 is limited to power reactor sites such as Surry 1/2 whose original license applications were filed before January 10, 1997.

from the area. The exclusion area may be traversed by a highway, railroad, or waterway, provided these are not so close to the facility as to interfere with normal operations of the facility and provided appropriate and effective arrangements are made to control traffic on the highway, railroad, or waterway, in case of emergency, to protect the public health and safety. Residence within the exclusion area shall normally be prohibited. Activities unrelated to operation of the reactor may be permitted in the exclusion area under appropriate limitations, provided that no significant hazards to the public health and safety will result. In addition, 10 CFR 100.11(a)(1) states that an exclusion area should be determined such that an individual located at any point on its boundary for 2 hours immediately following an onset of a design basis accident fission product release would not receive a radiation dose exceeding prescribed limits.²

Sections 2.1.1 and 2.1.2 of Regulatory Guide (RG) 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants," provides licensees guidance as to the type of information that should be provided regarding EAB definition, authority, and control.

Guidance for U.S. Nuclear Regulatory Commission (NRC) staff reviewers is provided in Sections 2.1.1 and 2.1.2 of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants."

Verification that the proposed nuclear plant design meets the prescribed EAB radiation dose limits is accomplished by calculating expected offsite radiation doses based, in part, on site atmospheric dispersion characteristics. Guidance on appropriate methodology for calculating atmospheric dispersion for the EAB is provided in RG 1.145, "Atmospheric Dispersion Models for Potential Accident Consequence Assessments at Nuclear Power Plants."

3.0 TECHNICAL EVALUATION

TS 5.1 and UFSAR Section 2.1.2.1 currently describe the EAB as bounded by a 1650-foot radius centered at the Unit 1 reactor containment building. The proposed redefinition of the EAB as the site boundary will change the shape of the EAB and increase its size from approximately 0.79 square kilometers (196 acres) to 3.36 square kilometers (840 acres). The licensee recalculated the 0–2 hour EAB atmospheric dispersion factor based on minimum distances from various potential accident release points to the proposed revised EAB (i.e., site boundary) in each of the 16 wind direction sectors (e.g., North, North Northeast, Northeast, etc.).

The NRC staff reviewed the regulatory and technical analyses provided by the licensee in support of its proposed license amendment. Information regarding these analyses was provided in Attachment 1 of the submittal letter dated September 13, 2005, and in supplementary letters dated April 7, 2006, and May 23, 2006. The NRC staff also reviewed the assumptions, inputs, and methods used by the licensee to calculate a new 0–2 hour EAB χ/Q value based on the revised EAB. The NRC staff performed independent calculations to confirm the conservatism of the licensee's atmospheric dispersion analysis. However, the

²Because Surry 1/2 was granted a full-scope implementation of the alternative source term in License Amendment Nos. 230 and 230, dated March 8, 2002, the regulatory dose criteria of 10 CFR 50.67, "Accident Source Term," are applicable in lieu of the 10 CFR 100.11(a) dose limits.

findings of this safety evaluation are based on the descriptions of the licensee's analyses and other supporting information docketed by the licensee.

3.1 Exclusion Area Authority and Control

The licensee proposes to change TS 5.1 to redefine the EAB as the site boundary. Section 2.1.1.2, "Site Description," of the current Surry 1/2 UFSAR states that (1) the plant property lines are the same as the site boundary lines, and (2) the licensee owns all of the land within the site boundary, both above and beneath the surface, with the exception of State Route 650, which passes through the site to the Hog Island State Wildlife Management Area. The licensee also states in its submittal that (1) the property line defines the restricted area,³ (2) the boundary is clearly posted and monitored to ensure that unauthorized personnel will not transgress the boundary, and (3) the licensee controls access to all areas within the site boundary.

In a letter dated February 22, 2006, the NRC staff requested additional information related to the licensee's authority to control various activities associated with the new, larger EAB. In its letter response dated April 7, 2006, the licensee stated that it has (1) the authority to control activities within the revised EAB, including the exclusion and removal of personnel and property, and (2) total control over access to the revised EAB, except for the public access on State Route 650 to the Hog Island State Wildlife Management Area. No activities unrelated to plant operations (other than transit through the area) are permitted in the revised EAB without Dominion's approval. The licensee also stated that State Route 650 is sufficiently distant from plant structures so that routine use of this route is not likely to interfere with normal plant operation. The licensee stated that it has measures in place through an Emergency Plan Implementing Procedure for controlling traffic entering and leaving the revised EAB on State Route 650 in the event of an emergency. Letters of Agreement are also maintained with offsite agencies supporting traffic control in the area around Surry 1/2 (e.g., the Commonwealth of Virginia Department of Emergency Management, the Virginia State Police (Fifth Division), and the Surry County Sheriff's Office).

The NRC has reviewed the licensee's information concerning exclusion area authority and control and concluded that the licensee has appropriately described the exclusion area and the methods by which access and occupancy of the exclusion will be controlled during normal operation and in the event of an emergency situation.

3.2 EAB Atmospheric Dispersion Analysis

The licensee recalculated the 0–2 hour EAB χ/Q value based on the minimum distances from various potential accident release points to the site boundary using the NRC-sponsored computer code PAVAN (NUREG/CR-2858, "PAVAN: An Atmospheric Dispersion Program for Evaluating Design Basis Accidental Releases of Radioactive Materials from Nuclear Power Stations"). The PAVAN model implements the methodology outlined in RG 1.145.

³Section 20.1003 of 10 CFR Part 20 defines "restricted area" as an area, access to which is limited by the licensee for the purpose of protecting individuals against undue risks from exposure to radiation and radioactive materials.

On March 8, 2002, the NRC staff issued License Amendment Nos. 230 and 230. These amendments approved a full-scope implementation of the alternative source term, including the use of a 0–2 hour EAB χ/Q value of 4.61×10^{13} sec/m³ for design basis accident dose assessments. This EAB χ/Q value was generated using the PAVAN computer code, assuming a ground level release and an EAB distance of 503 meters in all directions. PAVAN was executed using joint frequency distributions of 9.6-meter wind speed and direction data and stability data determined from delta-temperature measurements taken between the 44.9-meter and 9.6-meter levels on the meteorological tower. Two sets of meteorological data were used: 1982–1986 and 1994–1998. Because of differences between these two 5-year periods of record, the higher, more conservative χ/Q value was selected.⁴

The higher 0–2 hour EAB χ/Q value, 4.61×10^{13} sec/m³, was associated with the 1994–1998 meteorological data set.⁵

In its submittal dated September 13, 2005, the licensee presented a recalculated 0–2 hour EAB χ/Q value, which was derived using the same 1994–1998 PAVAN inputs, except that distances from various loss-of-coolant accident and fuel handling accident release points to the site boundary in each of the 16 wind direction sectors were used instead of a circular EAB distance of 503 meters. The distances used represented the minimum distances from potential release points in each 22½-degree wind direction sector. In contrast, Regulatory Position C.1.2 of RG 1.145 states that for releases through vents or building penetrations, the distances for EAB χ/Q calculations should be the minimum distance from the nearest point on the building to the EAB within a 45-degree sector centered on each of the 16 wind direction sectors. The RG 1.145 procedure takes into consideration the possibility of curved airflow trajectories, plume segmentation during low wind and stable conditions, and the potential for wind speed and wind direction frequency shifts from year to year. In its letter dated February 22, 2006, the NRC staff requested additional information related to justification for why RG 1.145 methodology was not used to determine the minimum distances from potential releases to the EAB in each wind direction sector.

In its response dated May 23, 2006, the licensee provided a new set of minimum distances from each release point to the EAB within a 45-degree sector centered on each compass direction consistent with the RG 1.145 guidance. This new set of EAB distances was based on a revised Surry 1/2 site plan drawing that contained corrected conversions from a property survey to a drawing. The new set of EAB distances also represented potential source release locations for the steam generator tube rupture, main steam line break, and locked rotor accidents as well as the loss-of-coolant and fuel-handling accidents. These potential source release locations included the Unit 1 Containment, the Unit 2 Containment, Ventilation Vent No. 2, East Auxiliary Building Louvers, West Auxiliary Building Louvers, Unit 1 steam generator power-operated relief valves, and Unit 2 steam generator power-operated relief valves. The licensee used the new set of EAB distances in PAVAN to recalculate the 0–2 hour EAB χ/Q value, using the 1994–1998 meteorological data. Based on RG 1.145, the χ/Q value to be

⁴The NRC staff performed a comparison between the 1982–1986 and 1994–1998 lower level (9.6-meter) wind data sets as part of its review of License Amendment Nos. 230 and 230. This comparison showed a slight discrepancy in the wind direction distributions and a higher frequency of low wind speeds for 1994–1998.

⁵The lower wind speeds associated with the 1994–1998 data set most likely explains why this data set resulted in the higher 0–2 hour EAB χ/Q value.

used in an accident analysis should be the limiting 0.5 percent sector-dependent χ/Q value or the 5 percent overall site χ/Q value, whichever is higher. The licensee selected the Unit 1 containment release 0–2 hour sector-dependent χ/Q value of 1.76×10^{-3} sec/m³ as the 0–2 hour EAB χ/Q value since it was the highest χ/Q value among the resulting sector-dependent and overall site χ/Q values for all the modeled release pathways.⁶

The NRC staff made an independent evaluation of the resulting 0–2 hour EAB χ/Q value by running the PAVAN computer model and obtained similar results.⁷

Because the licensee's atmospheric dispersion analysis was based on RG 1.145 methodology using meteorological data previously reviewed by the NRC staff in support of License Amendment Nos. 230 and 230, the NRC staff has concluded that a 0–2 hour EAB χ/Q value of 1.76×10^{-3} sec/m³ is acceptable for use in future EAB dose assessments for the release pathways discussed above.

3.3 Technical Specification Changes

The licensee proposed revising TS 5.1 as follows:

Add the following sentence: The site exclusion area boundary is defined by the site boundary line shown on the site map in TS Figure 5.1-1.

Delete the following sentence: A map of the site is shown in TS Figure 5.1-1.

Add the word 'area' between exclusion and boundary to the following sentence: The minimum distance from a reactor centerline to the site exclusion area boundary as defined in 10 CFR 100 is 1,650 ft.

Although TS 5.1 presents 1,650 feet (503 meters) as the minimum distance from the Unit reactor centerline to the EAB, the shortest Unit 1 containment to the site boundary distance used in the atmospheric dispersion analysis was 500 meters (in the North and North Northeast sectors), based on data from a revised Surry 1/2 site plan drawing. The use of a slightly shorter minimum site boundary distance in the atmospheric dispersion analyses is conservative.

The licensee did not submit a revised design basis accident dose consequence analyses because the existing design basis analyses are conservative with respect to the consequences that would be calculated using the new 0–2 hour EAB χ/Q value.

⁶The Unit 1 containment release 0–2 hour sector-dependent χ/Q value of 1.76×10^{-3} sec/m³ occurred in the North downwind sector at a distance of 500 meters.

⁷It is interesting to note that the revised 0–2 hour EAB χ/Q value of 1.76×10^{-3} sec/m³ is 40 percent of the existing 0–2 hour EAB χ/Q value of 4.61×10^{-3} sec/m³. This is due to the increased size of the redefined EAB. The existing 0–2 hour EAB χ/Q value is based on the 0.5 percent Southeast sector χ/Q value, which was calculated at a downwind distance of 503 meters whereas the revised 0–2 hour EAB χ/Q value is based on the 0.5 percent North sector χ/Q value, which was calculated at a downwind distance of 500 meters. Redefining the EAB as the site boundary increased the downwind distance to the previously limiting Southeast sector from 503 meters to 1247 meters.

3.4 Conclusion

The NRC staff has reviewed the revised EAB proposed by the licensee for Surry 1/2. The NRC staff also reviewed the proposed change to the 0–2 hour EAB χ/Q value. In performing this review, the NRC staff relied upon information placed on the docket by the licensee, NRC staff experience in doing similar reviews and, where deemed necessary, on NRC staff confirmatory calculations.

The NRC staff concludes that the licensee's proposed revised exclusion area is acceptable and meets the requirements of 10 CFR Part 100. This conclusion is based on the licensee having appropriately described the plant exclusion area, the authority under which all activities within the exclusion area can be controlled, and the methods by which access and occupancy of the exclusion area can be controlled during normal operation and in the event of an emergency situation. In addition, the licensee has the required authority to control activities within the designated exclusion area, including the exclusion and removal of persons and property, and has established acceptable methods for control of the designated exclusion area.

The NRC staff concludes that the 0–2 hour EAB atmospheric dispersion estimate of 1.76×10^{13} sec/m³ is acceptable for the release pathways described above and meets the relevant requirements of 10 CFR Part 100. This conclusion is based on the conservative assessments of post-accident atmospheric dispersion conditions that have been made by the licensee from the licensee's meteorological data and appropriate diffusion models. This atmospheric dispersion estimate is appropriate for the assessment of consequences from radioactive releases for design basis accidents in accordance with 10 CFR Part 100.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Virginia State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (71 FR 156). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: B. Harvey

Date: August 10, 2006

Surry Power Station, Units 1 & 2

cc:

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