

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

July 20, 2007

10 CFR 50.90

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

Serial No. 07-0443A  
SPS-LIC/CGL R0"  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**PROPOSED TECHNICAL SPECIFICATIONS CHANGE**  
**TEMPORARY 45-DAY AND 14-DAY ALLOWED OUTAGE TIMES TO**  
**REPLACE MAIN CONTROL ROOM AND EMERGENCY**  
**SWITCHGEAR ROOM AIR CONDITIONING SYSTEM**  
**CHILLED WATER PIPING**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

By letter dated February 26, 2007 (Serial No. 07-0109), Virginia Electric and Power Company (Dominion) requested amendments to Facility Operating License Numbers DPR-32 and DPR-37 for Surry Power Station Units 1 and 2. The proposed change will permit the use of temporary 45-day and 14-day allowed outage times (AOTs) to facilitate replacement of Main Control Room (MCR) and Emergency Switchgear Room (ESGR) Air Conditioning System (ACS) chilled water piping.

In a letter dated May 31, 2007, the NRC requested additional information to facilitate their review of the license amendment request, and Dominion responded to the NRC request in a June 28, 2007 letter (Serial No. 07-0443). On July 3, 2007, the NRC provided questions associated with Dominion's June 28, 2007 response. A conference call with the NRC was held on July 12, 2007, to discuss the NRC's questions, and, as a result of the call, the NRC's questions were combined and reduced to a single question that required a docketed response. The NRC question and Dominion's response is provided in the attachment.

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

Very truly yours,

  
Gerald T. Bischof  
Vice President – Nuclear Engineering

Attachment:  
Response to July 3, 2007 NRC Request for Additional Information as Modified July 12, 2007

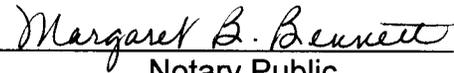
Commitments made in this letter: None.

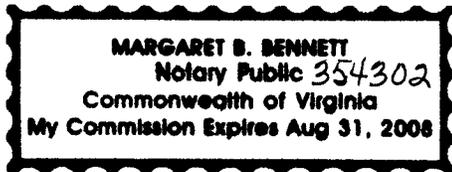
COMMONWEALTH OF VIRGINIA     )  
COUNTY OF HENRICO            )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Gerald T. Bischof, who is Vice President – Nuclear Engineering, 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 the 20<sup>th</sup> day of July, 2007.

My Commission Expires: August 31, 2008

  
Notary Public



cc: U.S. Nuclear Regulatory Commission  
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**Attachment**

**Proposed Technical Specifications Change -  
Temporary 45-day and 14-day AOTs to Replace  
MCR and ESGR Air Conditioning System Chilled Water Piping**

**Response to July 3, 2007 NRC Request for Additional Information  
as Modified July 12, 2007**

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

**Response to July 3, 2007 NRC Request for Additional Information  
as Modified July 12, 2007**

QUESTION: *The licensee's PRA model assumes that for a loss of MCR cooling, the MCR would be abandoned and the plant would be shut down from the ASP. The licensee should describe why this PRA assumption is conservative, addressing the anticipated temperature transient in the control room, equipment qualification of the MCR components, and the availability and procedural controls for alternate cooling capabilities not assumed to be used in the PRA.*

RESPONSE:

At the time that the Technical Specifications change request was transmitted [by our February 26, 2007 letter (Serial No. 07-0109)], the Main Control Room (MCR) GOTHIC analysis referenced in our May 14, 2007 letter (Serial No. 07-0109B) was not available. Therefore, the PRA model conservatively assumed that MCR overheating would require operator relocation to the Auxiliary Shutdown Panel (ASP). The assumed relocation is conservative because the model includes an additional risk of failure to control decay heat removal from the ASP, leading to core damage. The subsequent MCR heatup calculation (i.e., the Gothic analysis) indicates that MCR evacuation would not be necessary in the event of the loss of chilled water. As noted in the Response to Question 8 in Attachment 1 to our June 28, 2007 letter (Serial No. 07-0443), the GOTHIC analysis performed for the loss of chilled water predicts maximum bulk air temperatures in the MCR of 105°F (with no compensatory measures) at 24 hours. Additionally, UFSAR Section 7.7.1 addresses MCR instrumentation and indicates that qualification testing has demonstrated that the (safety-related) instrumentation remains operable up to 120°F.

In addition, although not credited in the PRA model, the backup cooling supply provided by the chillers located in the Mechanical Equipment Room No. 1 (MER-1) would be used by the Operations staff to maintain control room cooling in the event of the loss of chilled water and provides additional assurance that control room evacuation would be unnecessary. Use of this backup cooling supply during Phases III through VI, if required, was described in Attachment 4 in our February 26, 2007 letter (Serial No. 07-0109). Also as noted in the February 26, 2007 letter, procedural direction regarding the use of the MER-1 chillers will be developed. This procedural direction will be in place prior to the initiation of Phase III of the chilled water piping replacement activities.