

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

February 12, 2008

10CFR50.90

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

Serial No. 07-0109G
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
MCR AND ESGR AIR CONDITIONING SYSTEM CHILLED WATER PIPING
REPLACEMENT PROJECT – PHASE III SCOPE MODIFICATION

In a letter dated February 26, 2007 (Serial No. 07-0109), Virginia Electric and Power Company (Dominion) requested amendments, in the form of changes to the Technical Specifications (TS) to Facility Operating License Numbers DPR-32 and DPR-37 for Surry Power Station Units 1 and 2, respectively. The proposed TS change, which was approved by TS Amendments 258/257 issued by the NRC on January 23, 2008, 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. Attachment 4 of the February 26, 2007 letter presented the piping replacement plan, including a discussion of each phase of the project. The purpose of this letter is to advise you of a scope modification for Phase III due to material unavailability.

The February 26, 2007 letter states the following regarding Phase III:

Figure 6 illustrates the work scope for Phase III. . . . This phase involves a) the replacement of the chilled water loop C piping in the ESGR trench and the MCR, b) the addition of chilled water loop C isolation valves V3 and V4, c) the addition of valves V7 and V8 to permit isolation of MCR air handling units (AHUs) 1-VS-AC-2 and 2-VS-AC-8, and d) the addition of valves V11 and V12/hose connections on chilled water loop C to accommodate hook up of the chilled water backup supply.


As shown in the attached Figure 6, isolation valves V7 and V8, as well as valves V11 and V12/hose connections, will not be installed as part of Phase III due to unavailability of these components prior to the completion of Phase III. As discussed in the following paragraphs, this scope modification is not of concern with respect to either the piping replacement project or the temporary risk-informed 45-day AOT for Phase III; however, we are advising you of the scope modification, since it is a change to the submitted description of Phase III. These isolation valves and valves/hose connections will be installed following completion of Phase III but before the start of Phase IV, currently scheduled to begin on August 11, 2008. Installation of these components will be accomplished within the existing 7-day TS 3.23 AOTs for AHU inoperability (i.e., TS 3.23.C.2.a.1 and TS 3.23.C.2.b.1). This activity is consistent with Phase II, during which the valves and valves/hose connections serving the same function were installed on chilled water loop A.

Isolation valves V7 and V8, as well as isolation valves V3 and V4 (which will be installed during Phase III), are being installed to facilitate future maintenance activities following completion of the piping replacement project. Such future maintenance activities will use the existing 7-day TS 3.23 AOTs for AHU inoperability (i.e., TS 3.23.C.2.a.1 and TS 3.23.C.2.b.1). Valves V11 and V12/hose connections are being installed to accommodate hook up of the chilled water backup supply from the MER-1 chillers (1-VS-E-3A, 1-VS-E-3B) if needed during the subsequent phases of the piping replacement project. As noted above, these valves and valves/hose connections will be installed after Phase III and before Phase IV, which is prior to possible use of these components.

Entry into the additional (deterministic-based) TS 3.23 7-day AOTs to install these valves and valves/hose connections does not impact the probabilistic risk assessment (PRA) performed for the temporary 45-day and 14-day (risk-informed) AOTs. However, even if the additional 7-day AOT entry were considered with respect to the PRA, the PRA would remain bounding since it was performed for four 45-day AOT entries (180 days). Entries into the two 45-day AOTs, the two 14-day AOTs, and this additional TS 3.23 7-day AOT total 125 days. Furthermore, the additional 7-day AOT entry will be accounted for with respect to the maintenance rule requirements of 10CFR50.65(a)(4) to satisfy the RG 1.177 Tier 3 configuration risk management program requirements.

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

Sincerely,


Gerald T. Bischof
Vice President – Nuclear Engineering

Commitments made in this letter: None

Attachment: Figure 6 showing Phase III scope modification

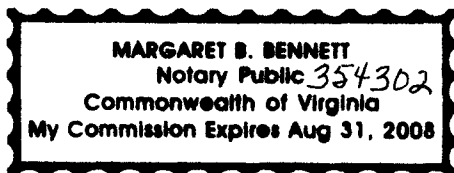
COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

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 this 12th day of February, 2008.

My Commission Expires: August 31, 2008


Notary Public



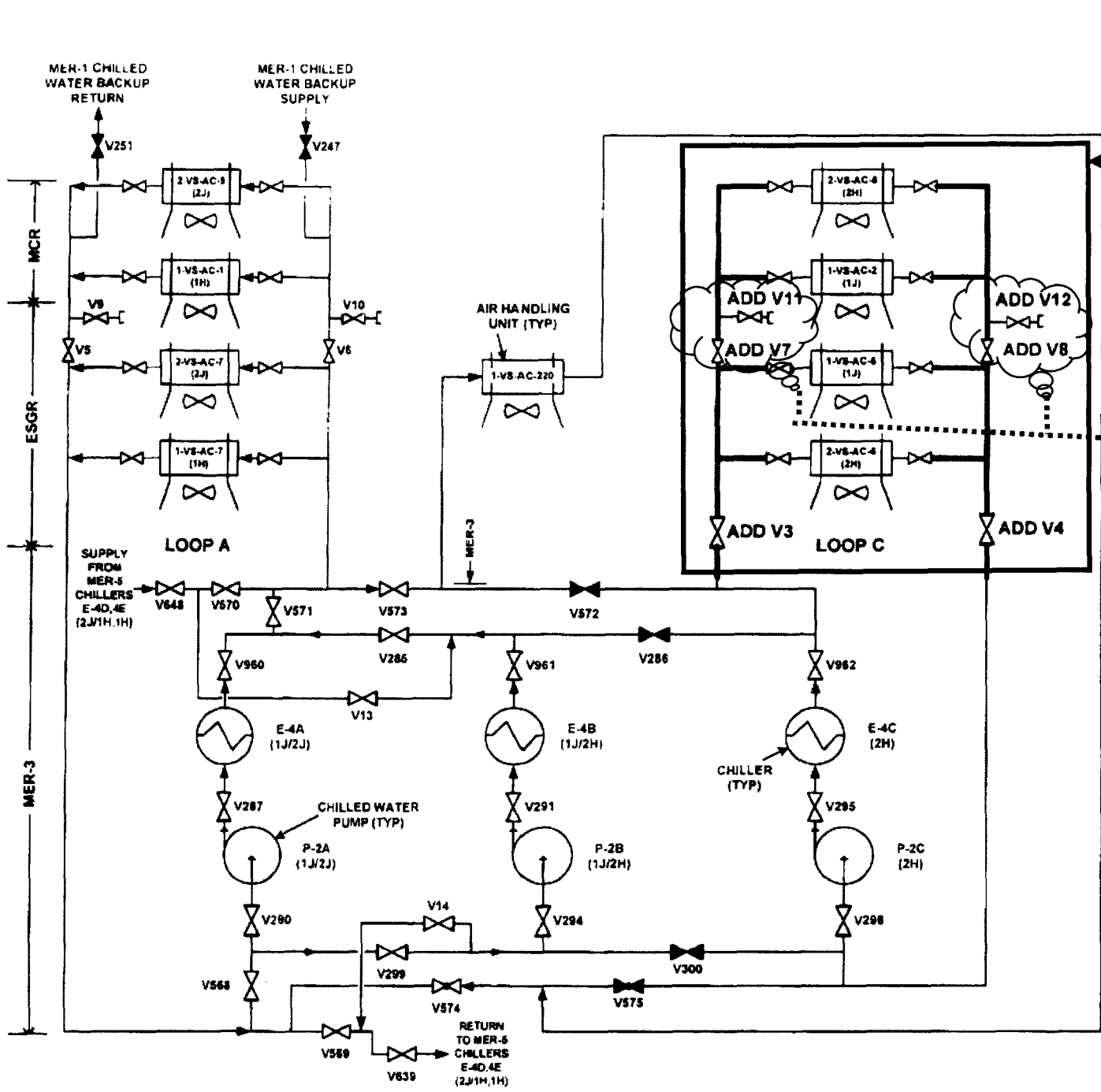
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Piping and valves to be replaced by original Phase III scope

Valves not being added in modified Phase III scope

PHASE III WORK SCOPE

During the first temporary AOT (45 days), (a) loop C piping will be replaced, (b) new loop isolation valves V3 and V4 will be added, and (c) new valves V7, V8, V11, and V12 will be added.

Notes:

1. Chillers 1-VS-E-4A, 1-VS-E-4B, 1-VS-E-4D, and 1-VS-E-4E will be available to supply operating loop A.
2. Four emergency buses will be available to power the operable chillers and thus satisfy the requirements of T.S. 3.23.C.1.b.
3. Loop A provides MER-1 chilled water backup supply to loop C ESGR AHUs.

**MCR / ESGR
CHILLED WATER
SYSTEM
PHASE III
FIGURE 6**