

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 3, 2008

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Serial No. 08-0013E
NLOS/GDM R0
Docket Nos. 50-280/281
License Nos. DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
SURRY POWER STATION UNITS 1 AND 2
CORRECTION TO NINE-MONTH RESPONSE TO NRC GENERIC LETTER 2008-01,
MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT
REMOVAL, AND CONTAINMENT SPRAY SYSTEMS

On January 11, 2008, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, *Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems*. The GL requested each licensee to evaluate the licensing basis, design, testing, and corrective action programs for the Emergency Core Cooling System (ECCS), Residual Heat Removal (RHR) System, and Containment Spray (CS) System to ensure that gas accumulation is maintained less than the amount that could challenge operability of these systems, and that appropriate action be taken when conditions adverse to quality are identified.

By letter dated October 14, 2008 (Serial No. 08-0013B), Dominion provided its nine-month response for Surry and North Anna Power Stations. Attachment 1 to that letter provided the response for Surry. In Section A.1 of the Surry response, Dominion noted that we had reviewed the Surry license basis to determine which documents address the management of gas accumulation in the ECCS, CS and RHR systems. The response noted that the Basis sections for TS 3.5 and TS 4.5 and Section 6.3.1.5.2, *Recirculation Spray Subsystem*, of the Surry Updated Final Safety Analysis Report (UFSAR) discussed gas accumulation. The response concluded that the Surry TS and UFSAR do not sufficiently document the bases and surveillance requirements needed for the ECCS to remediate potential gas accumulation. Subsequent to the submittal of the nine-month response to GL 2008-01 for Surry, Dominion identified an additional UFSAR section that discusses gas accumulation. Specifically, UFSAR Section 6.2.2.2.6, *Vent Valves*, notes the following:

6.2.2.2.6 Vent Valves

High point vents have been installed at critical points in the suction lines of the charging (HHSI) pumps, and the discharge lines of the LHSI pumps where gasses could collect during plant operation. These vents have been installed to

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