VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

February 20, 2009

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

Serial No.: 09-071
NL&OS/GDM R1
Docket No.: 50-280
License No.: DPR-32

**VIRGINIA ELECTRIC AND POWER COMPANY**
**SURRY POWER STATION UNIT 1**
**PROPOSED LICENSE AMENDMENT REQUEST**
**INTERIM ALTERNATE REPAIR CRITERIA FOR STEAM GENERATOR TUBE REPAIR**
**REQUEST FOR ADDITIONAL INFORMATION**

In a letter dated October 14, 2008 (Serial No. 08-0521), Virginia Electric and Power Company (Dominion) requested an amendment in the form of changes to the Technical Specifications (TS) to Facility Operating License Number DPR-32 for Surry Power Station (SPS) Unit 1. The amendment request proposes a one cycle revision to the SPS Unit 1 TS. Specifically, TS 6.4.Q, "Steam Generator (SG) Program," and TS 6.6.A.3, "Steam Generator Tube Inspection Report," will be revised to incorporate an interim alternate repair criterion into the provisions for SG tube repair for use during the Surry Unit 1 2009 spring refueling outage (R-22) and the subsequent operating cycle.

In a letter dated January 23, 2009, the NRC determined that additional information was required to facilitate their review of the license amendment request (LAR). The NRC request and the Dominion response are provided in the attachment.

The additional information provided herein does not affect the significant hazards consideration determination or environmental assessment that was previously provided in support of the proposed license amendment request.

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

Sincerely,

J. Alan Price
Vice President – Nuclear Engineering

COMMONWEALTH OF VIRGINIA )
)
COUNTY OF HENRICO )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by J. Alan Price, 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 20th day of February, 2009.

My Commission Expires: 4/30/13

Notary Public

[illegible] ALLIGOOD
Notary Public
Commonwealth of Virginia
310847
My Commission Expires Apr 30, 2013

Attachment:
Response to NRC Request for Additional Information, Surry Power Station Unit 1

Commitment:

1. As specified in the October 14, 2008 license amendment request, Dominion hereby makes a regulatory commitment to use the 2.5 leakage factor upon implementation of the IARC for Surry Unit 1 steam generator tube repair.

cc: U.S. Nuclear Regulatory Commission
Region II
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NRC Senior Resident Inspector
Surry Power Station

State Health Commissioner
Virginia Department of Health
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## Attachment

## Response to NRC Request for Additional Information
## Surry Power Station Unit 1

In a letter dated October 14, 2008 (Serial No. 08-0521), Virginia Electric and Power Company (Dominion) requested an amendment to incorporate an interim alternate repair criterion into the provisions for SG tube repair for use during the Surry Unit 1 2009 spring refueling outage (R-22) and the subsequent operating cycle. In a letter dated January 23, 2009, the NRC determined that additional information was required to facilitate their review of the license amendment request (LAR). The NRC request and the Dominion response are provided below.

### NRC Question No. 1

*Page 10 of Enclosure 1 to the October 14, 2008, letter, states that a ratio of 2.5 will be used for both the condition monitoring and the operational assessment upon implementation of the interim alternate repair criteria. During a public meeting on November 19, 2008 (summary available in ADAMS, Accession No. ML083540708), Westinghouse presented information suggesting that leakage factors as high as 6.78 may need to be used, depending on the plant. Does the leakage factor of 2.5 included in the October 14, 2008, submittal account for the changes suggested by Westinghouse on November 19, 2008? If so, please provide the calculations used to arrive at the 2.5 factor you have provided. If not, what actions do you intend to take to incorporate the potential changes Westinghouse suggested in the November 19, 2008, public meeting?*

### Dominion Response:

The information that Westinghouse provided during the referenced public meeting was considered preliminary and was presented in the context of a status update for the progress being made in the development of the permanent H*. Similar public meetings have been held prior to and subsequent to the referenced meeting, the most recent on January 9, 2009 at the NEI offices in Washington, D.C. During that meeting, an updated leakage factor analysis was presented by Westinghouse and provided to the NRC staff in Westinghouse letter LTR-SGMP-09-2 (proprietary and non-proprietary), together with the appropriate Affidavit for Withholding. The analysis concluded that a leakage factor of 2 was bounding for all plants considered candidates for the IARC and the permanent H*.

Subsequent to the January 9, 2009 meeting, following NRC informal review of the leakage analysis proposed for the final H* justification, a teleconference was held with the NRC on February 10, 2009. In this teleconference, agreement was reached that the Feedwater Line Break Transient is reasonably bounded by the Steam Line Break transient, and that no uncertainty factor on the pressure ratio is necessary in the analysis. The resulting leak rate factor for all H* candidate plants is bounded by a factor of 2.03. Westinghouse is updating the leak rate analysis for NRC review.

Therefore, the leakage factor of 2.5 (which the NRC previously approved for use) contained in the Westinghouse technical support document provided as part of the Surry IARC LAR conservatively bounds the justifiable leakage factor for all normal operating and design basis accident conditions contained in the current licensing basis for Surry Units 1 and 2. Based on the most current analysis results, no further action is required by Dominion.

**NRC Question No. 2**

*The leakage factor used for Surry 1 should be provided as a formal regulatory commitment. Please provide a formal regulatory commitment letter.*

**Dominion Response:**

Page 10 of Enclosure 1 of the Surry Unit 1 steam generator tube repair IARC LAR includes the following statement:

> For integrity assessments, the ratio of 2.5 will be used in completion of both the condition monitoring (CM) and operational assessment (OA) upon implementation of the IARC. For example, for the CM assessment, the component of leakage from the lower 4 inches for the most limiting steam generator during the prior cycle of operation will be multiplied by a factor of 2.5 and added to the total leakage from any other source and compared to the allowable accident analysis leakage assumption. For the OA, the difference in leakage from the allowable limit during the limiting design basis accident minus the leakage from the other sources will be divided by 2.5 and compared to the observed leakage. An administrative limit will be established to not exceed the calculated value.

Dominion hereby makes a regulatory commitment to use the 2.5 leakage factor as specified in the above paragraph (excerpted from the October 14, 2008 license amendment request) upon implementation of the IARC for Surry Unit 1.