



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

August 15, 2012

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

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION (NOED) FOR SURRY POWER STATION UNITS 1 AND 2, TECHNICAL SPECIFICATION 3.16 EMERGENCY POWER SYSTEM, SPECIFIC TO EMERGENCY DIESEL GENERATOR (EDG) 02-EE-EG-1 [NOED NO. 12-2-003]

Dear Mr. Heacock:

By letter dated August 13, 2012, you requested that the NRC exercise discretion to not enforce compliance with the actions required in Surry Power Station (SPS) Units 1 and 2, Technical Specification (TS) 3.16, Emergency Power System. Specifically, your request for enforcement discretion applies to TS 3.16.B.1.a.3 for EDG 02-EE-EG-1. Your letter documented information previously discussed with the NRC staff in a telephone conference on August 12, 2012, at 7:00 p.m. (all times refer to Eastern Daylight Time). The principal NRC and Dominion staff members who participated in the telephone conference are listed in the Enclosure. The NRC staff determined that the information in your letter requesting the NOED was consistent with your oral request.

You stated that the SPS number 2 EDG (02-EE-EG-1) was removed from service at 11:00 pm on August 6, 2012, to perform routine maintenance activities and testing. As part of the activities, 02-EE-EG-1 oil samples were collected and analyzed. The analysis identified the presence of silver particles in the EDG oil following a post-maintenance test run of the EDG, which indicated potential internal EDG component damage of the piston wrist pin bearing(s). Consequently, the 02-EE-EG-1 wrist pin bearings were inspected, and it was determined that the piston number 5 wrist pin bearing exhibited evidence of damage. The identification of the wrist pin bearing damage occurred on day five of the seven-day allowed outage time (AOT) which would expire at 11:00 pm August 13, 2012. You requested an extension of the seven day AOT by an additional five days for a total of 12 days. The requested extension was necessary to perform the repairs required to restore 02-EE-EG-1 to operable status. You requested that a NOED be granted pursuant to the NRC's policy regarding the exercise of discretion for an operating facility, set out in Section 3.8 of the Enforcement Policy and that the NOED be effective until August 18, 2012, at 11:00 p.m. This letter documents our telephone conversation on August 12, 2012 at 7:00 p.m., when we orally granted this NOED request.

The NRC staff determined that the requested NOED was necessary to avoid an unnecessary transient as a result of compliance with the license condition and, thus, minimize potential safety consequences and operational risks (Part 9900, Section B.2.1, criterion 1.a). The NRC staff's basis for this discretion considered your commitments including:

- No planned unit transients will be allowed for the duration of the extended diesel AOT;
- The Operations department will monitor weather conditions to assess potential impacts on plant conditions due to adverse weather conditions;
- Valve 02-SW-MOV-201A will be maintained closed for the duration of the extended diesel AOT to prevent the intake canal from draining during a loss of offsite power;
- Appropriate personnel will be briefed by Operations on the procedures for a loss of offsite power and for energizing the 2H bus from the station blackout diesel (0-AAC-DG-0M);
- Hourly fire watches will be established in the Unit 1 and Unit 2 cable vault/tunnels, Unit 1 emergency switchgear room, the Unit 1 and Unit 2 normal switchgear rooms, the #1 EDG room and the #3 EDG room;
- The following equipment will be protected in accordance with OP-SU-601, "Protected Equipment" during the discretionary period: station blackout diesel (0-AAC-DG-0M), #1 EDG (1-EE-EG-1), #3 EDG (3-EE-EG-1), reserve station system transformers, Unit 1 and Unit 2 turbine driven auxiliary feedwater pumps (1-FW-P-2 and 2-FW-P-2) and the switchyard;
- No scheduled maintenance or surveillance testing will be allowed on the following equipment during the extended diesel AOT: station blackout diesel (0-AAC-DG-0M), #1 EDG (1-EE-EG-1), #3 EDG (3-EE-EG-1), Unit 1 and Unit 2 turbine driven auxiliary feedwater pumps (1-FW-P-2 and 2-FW-P-2) and switchyard related activities with the potential to result in the loss of offsite power;
- A backup supply of fuel for the station blackout diesel (0-AAC-DG-0M) will be maintained onsite to extend the 4 hour supply if needed; and
- The performance of a daily confirmation of stable grid conditions.

The basis for this discretion also considered that:

- Your calculated Incremental Conditional Core Damage Probability and Incremental Conditional Large Early Release Probability values did not exceed the threshold guidance provided in Inspection Manual Part 9900 Technical Guidance and were consistent with values calculated by NRC regional analysts;
- The cause and proposed plan to resolve the situation were understood such that there was a high likelihood that planned actions to resolve the situation could be completed within the proposed NOED time frame;
- The noncompliance would not be of potential detriment to the public health and safety; and
- Independent verification of some of these conditions and actions will be verified by our inspection staff.

On the basis of the NRC staff's evaluation of your request, we have concluded that granting this NOED is consistent with the Enforcement Policy and NRC staff guidance and has no adverse impact on public health and safety or the environment. Therefore, as we informed you at

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8:39 p.m., on August 12, 2012, we exercised discretion to not enforce compliance with SPS TS 3.16.B.1.a.3 for the period from August 13, 2012, at 11:00 p.m., until August 18, 2012, at 11:00 p.m. As stated during the conference call and in your letter, you have determined that a follow up license amendment is not necessary. The NRC staff agrees with this determination.

Sincerely,

/RA/

Richard P. Croteau, Director
Division of Reactor Projects

Docket No.: 50-280, 50-281
License No.: DPR-32, DPR-37

cc w/encl: (See next page)

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Richard P. Croteau, Director
Division of Reactor Projects

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cc w/encl: (See next page)

X PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE SENSITIVE X NON-SENSITIVE
ADAMS: X Yes ACCESSION NUMBER: ML12228A623 X SUNSI REVIEW COMPLETE FORM 665 ATTACHED

OFFICE	RII:DRP	RII:DRP	RII:DRP	RII:DRP			
SIGNATURE	/RA/	/RA Bt SShaeffer/	/RA/	/RA/			
NAME	JMcCoy	SNinh	BJones	RCroteau			
DATE	815/2012	814/2012	8/14/2012	8/14/2012			
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\DRPI\RPB5\SURRYNOED 12-2-003.DOCX

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NOED

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