VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

November 5, 2013

U.S. Nuclear Regulatory Commission Attention: Document Control Desk

Washington, D.C. 20555

Serial No. 13-268A

NL&OS/GDM R0

Docket Nos.

50-280/281 License Nos. DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY **SURRY POWER STATION UNITS 1 AND 2 INSERVICE TESTING PROGRAM FOR PUMPS AND VALVES** FIFTH TEN YEAR INTERVAL UPDATE AND ASSOCIATED RELIEF REQUESTS

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION - RELIEF REQUEST P-5

By letter dated May 1, 2013 (Serial No. 13-268), Virginia Electric Power Company (Dominion) submitted the Inservice Testing Program for Pumps and Valves, Fifth Ten Year Interval Update, and associated relief requests, for Surry Power Station Units 1 and 2. In the associated relief requests, Dominion requested relief from certain requirements of the American Society of Mechanical Engineers Operation and Maintenance of Nuclear Power Plants Code. During their review of the relief requests provided in the submittal, the NRC staff determined that additional information is required to complete their review of alternative request P-5 associated with the additional testing performed under the Surry Predictive Maintenance Program for the Containment Spray pumps. The NRC request for additional information and the Dominion response are provided in the attachment.

If you have any questions or require additional information, please contact Ms. Candee Lovett at (757) 365-2178.

Respectfully,

Site Vice President - Surry Power Station

Commitments made in this letter: None

Attachment: Response to NRC Request for Additional Information Associated with Relief

Request P-5 for the Unit 1 Containment Spray Pumps

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cc: U.S. Nuclear Regulatory Commission, Region II Marquis One Tower 245 Peachtree Center Avenue NE, Suite 1200 Atlanta, Georgia 30303-1257

NRC Senior Resident Inspector Surry Power Station

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Mr. R. A. Smith Authorized Nuclear Inspector Surry Power Station

Response to NRC Request for Additional Information Associated with Relief Request P-5 for the Unit 1 Containment Spray Pumps

By letter dated May 1, 2013 (Serial No. 13-268), Virginia Electric Power Company (Dominion) submitted the Inservice Testing Program for Pumps and Valves, Fifth Ten Year Interval Update, and associated relief requests, for Surry Power Station Units 1 and 2. In the associated relief requests, Dominion requested relief from certain requirements of the American Society of Mechanical Engineers Operation and Maintenance of Nuclear Power Plants Code. During their review of the relief requests provided in the submittal, the NRC staff determined that additional information is required to complete their review of alternative request P-5 associated with the additional testing performed under the Surry Predictive Maintenance Program for the Containment Spray (CS) pumps. The NRC request for additional information and the Dominion response are provided below.

NRC Request for Additional Information Related to Relief Request P-5-1

As part of the justification for relief from the requirements of ISTB-3300(e)(1), "Reference Values," alternative request P-5 for Surry Unit 1, under "Surry Predictive Maintenance Program," states that additional testing "such as vibration monitoring and analysis beyond that required by ISTB, and oil sampling and analysis" will be performed. In order to determine if the additional testing will provide an acceptable level of quality and safety in accordance with 10 CFR 50.55a(a)(3)(i), the staff requests the following information on the additional testing performed under the Surry Predictive Maintenance Program for CS pumps 1-CS-P-1A and 1-CS-P-1B:

1. Is the additional vibration testing performed under the Surry Predictive Maintenance Program in accordance with the Group A Test requirements in OM Code Section ISTB, Table ISTB-5121-1, "Centrifugal Pump Test Acceptance Criteria," with regard to acceptable range, alert range, and required action range? If not, please justify how the additional vibration monitoring and analysis is utilized to determine if pump performance is trending toward a degraded state.

Dominion Response

The additional vibration testing is performed on the clutch and the motor of 1-CS-P-1A and 1-CS-P-1B. The acceptable range, alert range, and required action range are chosen based on the same criteria that are used for the IST points on the component (i.e., in accordance with the Group A Test requirements in OM Code Section ISTB, Table ISTB-5121-1). The data are reviewed and trended and, if an unusual condition is noted, a Condition Report is generated in the station Central Reporting System to track the necessary corrective actions.

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2. What is the sampling frequency of the oil sampling and analysis for containment spray pumps 1-CS-P-1A and 1-CS-P-1B?

Dominion Response

Oil sampling frequency for 1-CS-P-1A and 1-CS-P-1B is performed quarterly as part of the quarterly pump test. The oil analysis is performed as soon as practical following retrieval of the sample.

3. The statement "such as vibration monitoring . . ." referenced above implies that additional techniques may be used for predictive maintenance on containment spray pumps 1-CS-P-1A and 1-CS-P-1B. For the containment spray pumps, what additional techniques, if any, are used to monitor potential degradation of the pump?

Dominion Response

Vibration monitoring and oil analysis are the only two predictive techniques used on 1-CS-P-1A and 1-CS-P-1B.