

*Central File*  
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**VIRGINIA ELECTRIC AND POWER COMPANY**  
**RICHMOND, VIRGINIA 23261**

August 31, 1979

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Serial No. 621  
PO/DLB:scj  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Dear Mr. O'Reilly:

Subject: IE Bulletin 79-05C and 06C

This is in response to IE Bulletin Nos. 79-05C and 79-06C, "Nuclear Incident at Three Mile Island - Supplement". Our response for Surry Power Station Unit Nos. 1 and 2 is attached.

Very truly yours,

*W.L. Stallings*  
C. M. Stallings  
Vice President-Power Supply  
and Production Operations

cc: Director, Office of Inspection and Enforcement  
U. S. NRC, Washington, D. C. 20555

Director, Office of Nuclear Reactor Regulation  
U. S. NRC, Washington, D. C. 20555

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RESPONSE TO IE BULLETIN 05C and 06C  
SURRY POWER STATION UNIT NOS. 1 AND 2

Responses are numbered as in the Bulletin

1. a. The applicable station procedures have been revised to direct tripping of all operating RCP's upon initiation of HPI (Safety Injection at Surry) caused by low reactor coolant system pressure.
- b. Two licensed operators will be in the control room at all times during single unit operation to accomplish this action and other immediate and followup actions required during such an occurrence. During two unit operation a total of three licensed operators will be in the control room at all times.
2. A series of Loss of Coolant Accident (LOCA) analyses for a range of break sizes and a range of time lapses between initiation of break and pump trip applicable to the 2, 3 and 4 loop plants has been performed by the Westinghouse Owner's Group. A report summarizing the results of the analysis of delayed Reactor Coolant Pump trip during small loss of coolant accidents for Westinghouse NSSS, will be submitted to Mr. D. F. Ross by Mr. Cordell Reed on August 31, 1979. In the report, maximum PCT's for each break size considered and pump shutoff times have been provided. The report concludes that if the reactor coolant pumps are tripped prior to the reactor coolant system pressure reaching 1250 psia, the resulting peak clad temperatures are less than or equal to those reported in the FSAR. In addition, it is shown that there is a finite range of break sizes and RCP trip times (in all cases 10 minutes or later) which will result in PCT's in excess of 2200<sup>o</sup>F as calculated with conservative Appendix K models. The operator in any event would have at least 10 minutes to trip the RCP's following a small break LOCA, especially in light of the conservatism in the calculations. This is appropriate for manual rather than automatic action, based on the guidelines for termination of RCP operation presented in WCAP-9600.
3. The Westinghouse Owners' Group has developed guidelines which were submitted to the NRC in Section 6 and Appendix A of WCAP 9600. The analyses provided as the response to item 2 are consistent with the guidelines in WCAP 9600. No changes to these guidelines are needed for either LOCA or non-LOCA transients.
4. The Owners' Group effort to revise emergency procedures covers many issues, including operation of the Reactor Coolant Pumps. The expected schedule for revising the LOCA, steamline break and steam generator tube rupture emergency procedures is the following:

Mid-October: Guidelines which have been reviewed by the NRC will be provided to each utility. Appropriate utility personnel associated with writing procedures will meet with the Owners' Group Subcommittee on Procedures and Westinghouse will provide the background for revising their emergency procedures.

1 to 2 months

from: Plant specific procedures will be revised.  
Mid-October

3 to 4 months

from: Revised procedures will be implemented and operators  
Mid-October trained.

5. Analyses related to inadequate core cooling and definition of conditions under which a restart of the RCP's should be attempted will be performed. Resolution of the requirements for the analyses and an acceptable schedule for providing the analyses and guidelines and procedures resulting from the analyses will be arrived at between the Westinghouse Owners' Group and the NRC staff.

#### Long Term

As discussed in our response to short-term item 2, we do not believe that automatic tripping of the RCP's is a required function based on the analyses that have been performed and the guidelines that have been developed for manual RCP tripping. We propose that this item be discussed with the NRC staff following their review of the Owners' Group Submittal.