

October 15, 1979

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Albert Schwencer, Chief
Operating Reactors Branch No. 1
Division of Reactor Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial Number 354D/061478
PO/SWB/sjl
Docket Nos.: 50-280
50-281
License Nos.: DPR-32
DPR-37

Dear Mr. Denton:

NRC FIRE PROTECTION SAFETY
EVALUATION REPORT
SURRY POWER STATION

We have received and reviewed Admendment Nos. 54 and 53 to Operating License Nos. DPR-32 and DPR-37 for the Surry Power Station Units 1 and 2. As stated in your transmittal letter dated September 19, 1979, Vepco letters 354B/061478(8-17-79) and 354C/06148(9-7-79), Vepco agreed to the contents of Drafts 1 and 2 of the Safety Evaluation Report. We agree with license amendments 54 and 53 which require the addition of modifications and additional information identified in paragraph 3.1.1 through 3.1.30 of the Safety Evaluation Report.

We cannot agree to the second paragraph of Section 3.1 Modifications which was not included in Drafts 1 and 2 of the Safety Evaluation Report. This paragraph appears to require NRC approval of design details prior to implementation of each designated modification. Design detail approval prior to implementation is not required since design criteria as documented in the Safety Evaluation Report was established after extensive correspondence and meetings between Vepco and the NRC.

To meet your review requirements, we will submit the following for your information:

- (1) A monthly report giving status of all modifications.
- (2) Design descriptions of the modifications as they are developed. The description will consist of an explanation of the modification and the design basis. This explanation will be similar in detail as presently found in a typical Safety Analysis Report.

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While the above does not provide for NRC approval of detail design prior to implementation, it does provide pertinent information regarding the design and continual updating of the status. This is consistent with present procedure for modifications to and construction of nuclear power stations.

The dates of October, 1980 and the next Unit 2 refueling outage following the present steam generator replacement committed to in our letter of September 7, 1979 will not support an NRC review of design details prior to implementation. It is our opinion that the methods of implementing modifications and reporting described above provide for timely implementation and adequate information to the Nuclear Regulatory Commission to assure adequacy of the design. We trust this meets your requirements and request the Safety Evaluation Report be changed to reflect the above.

Very truly yours,



C. M. Stallings

Vice President - Power Supply
and Production Operations

cc: Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
Region II