

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 2, 1980

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Serial No. 767
NO/DWL:jmj
Docket Nos. 50-280, 50-281
50-338, 50-339
License Nos. DPR-32, DPR-37
NPF-4, NPF-7

Dear Mr. Denton:

RESPONSE TO TMI ACTION PLAN
REQUIREMENTS II.K.3.30/31 AND I.C.1
SURRY AND NORTH ANNA POWER STATIONS

In response to the September 5, 1980 letter from D. G. Eisenhut, NRC, on Preliminary Clarification of TMI Action Plan Requirements, the following information is provided.

Item II.K.3.30 of the subject letter requires that a detailed outline of the scope and schedule for revised small-break LOCA methods be submitted to the NRC by October 1, 1980. Vepco's position on this requirement is that the current Westinghouse small-break LOCA model used to analyze the Surry and North Anna nuclear units is already in conformance with 10CFR Part 50, Appendix K. However, Westinghouse has indicated that they will address the schedule for completion of this requirement by January 1, 1982. Accordingly, Westinghouse will provide a detailed outline of the scope and schedule of this effort by means of a direct letter to the NRC on or about the October 1, 1980 deadline.

Item II.K.3.31 requires a plant specific small-break LOCA re-analysis using the revised model of item II.K.3.30. If the results of the new Westinghouse model (and subsequent NRC review and approval) indicate that the present small-break LOCA analyses for the Surry and North Anna nuclear units are not in conformance with 10CFR Part 50.46, new plant specific analysis utilizing the new and approved Westinghouse model will be submitted to the NRC in accordance with NRC schedules.

Item I.C.1 requires a re-analysis of transients, accidents, and inadequate core cooling and preparation of guidelines for development of emergency procedures. This information is to be received by the NRC by January 1, 1981. Currently, Vepco is pursuing this requirement through the Westinghouse Owners Group. The Owners Group has submitted emergency procedure guidelines for NRC review and comment (Westinghouse to NRC, letter OG-37 dated July 15, 1980). To date, no feedback has been received by the Owners Group on this effort.

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During the regional meeting held September 22, 1980 to discuss the revisions and clarifications of TMI Action Plan requirements, the Westinghouse Owners Group expressed their willingness to meet with the NRC to further clarify the requirements of I.C.1. Such a meeting is currently being pursued by the Owners Group for the purpose of determining what additional effort is required to satisfy the requirements of I.C.1.

It is Vepco's position that if significant additional effort is required, the January 1, 1981 deadline is unrealistic. The reason for this position is that Westinghouse has informed Vepco (and other Owners Group members) that their work load through January 1, 1981, could not support any significant revisions or additional analysis regarding the previously submitted emergency procedure guidelines. A re-evaluation of our position will be provided to you following Westinghouse Owner Group discussions with the NRC regarding the status of the currently submitted emergency procedure guidelines.

Very truly yours,



B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

cc: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing

Mr. B. Joe Youngblood, Chief
Licensing Branch No. 1
Division of Licensing