

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

DISTRIBUTION SERVICES UNIT

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November 17, 1980

Mr. Daniel J. Donoghue, Director
Office of Administration
Attention: Ms. Reba M. Diggs
Licensing Fee Management Branch
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 162030
NO/WRM: smv
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

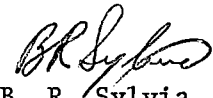
Dear Mr. Donoghue:

We have received the letter of October 30, 1980 from Ms. Reba M. Diggs concerning our license amendment application of May 16, 1980. We have reviewed both the letter from Ms. Diggs and our license amendment application and have the following comments regarding the proposed license amendment fee determination associated with the requested changes.

Our license amendment application of May 16, 1980 responded to concerns raised by Mr. D. G. Eisenhut in his letter of April 10, 1980 concerning clarifying the meaning of the term OPERABLE as it applies to the single failure criterion for safety systems in power reactors. Our understanding of the meaning of operability and the meaning of the term OPERABLE, as applied to and used in the Surry Technical Specifications, remains both unaltered and in complete conformance with the guidelines presented in Mr. Eisenhut's letter. Since the changes associated with the clarification of the meaning of operability were proposed at the request of the Staff and do not involve a new and previously unreviewed safety issue for the reason stated above, the requested changes were evaluated as administrative.

In view of these facts, we request that your office reevaluate your determination of the required license amendment fee. If you wish to discuss this matter, please contact this office.

Very truly yours,



B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

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

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