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VIRGINIA ELECTRIC AND POWER COMPANY, RICHMOND, VIRGINIA 23261

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Mr. Harold R. Denton, Director
Nuclear Reactor Regulation
Attn: Mr. Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Serial No. 976
QA/PRB:rab

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

Dear Mr. Denton:

We request that we be excluded from submitting the State of North Carolina Emergency Plan as part of Surry Power Station's Emergency Plan for the following reasons:

1. The Surry 50 mile EPZ intrudes only 4 miles into North Carolina and covers approximately 76 square miles of that State. This area is sparsely populated, less than 4,500 residents.
2. Approximately two thirds of the area is either swamp or managed forest and only one third is devoted to agriculture. Crop production is principally soybeans and peanuts.
3. Based upon historical meteorological data we estimate that a wind from the direction of Surry Power Station to this area only occurs 0.5% of the year.
4. Our calculations indicate that in the event of a major release of radioactivity from the station the expected doses at the 45 mile radius will be
 - a) To an infant thyroid from the milk path-way 0.16 to 0.19 rad-iodine, from cow and goat milk.
 - b) 0.0013 rad-air dose to the skin from noble gases.

These plume exposures represent the worst cases and are well within the limits of the Protective Action Guides at the 45 mile radius of the 50 mile EPZ, and will be even less in the 45 to 50 mile segment of the zone that impacts the State of North Carolina.

We feel that the foregoing discussion justifies an exclusion being granted to the Surry Emergency Plan of the requirement to include the State Emergency Plan for North Carolina, in-as-much-as there is no significant input

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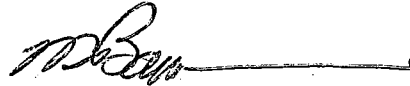
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to the food-chain in North Carolina or the population within the 50 mile EPZ from a radiological incident at Surry Power Station.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'E. A. Baum', followed by a horizontal line.

E. A. Baum
Exec. Mgr.-Quality Assurance

cc: Mr. George Jones
Office of Emergency & Energy Services
Commonwealth of Virginia