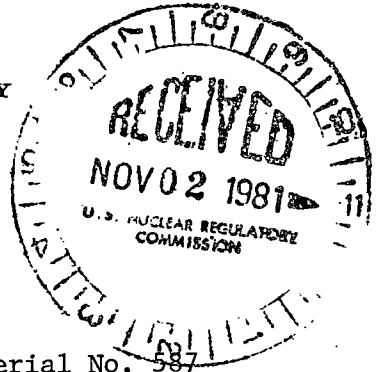


VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261



R. H. LEASBURG  
VICE PRESIDENT  
NUCLEAR OPERATIONS

October 29, 1981

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

Serial No. 587  
NO/RMT:acm  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Gentlemen:

Relief is requested from Article III.A.6(b) of Appendix J of 10 CFR 50 which would require an ILRT for Surry Unit 2 because of a test failure in 1976 prior to Type C repairs and an initial test failure following Steam Generator Replacement. The following justification is provided.

1. The 1976 Unit 2 ILRT was performed in accordance with the 1971 Proposed Appendix J as per Surry Technical Specifications at that time. Unlike the 1973 standard, the 1971 Proposed Appendix J delineated that Type A test be performed prior to Type B and C tests and in Section IIIA.7(f) that the Type A test need not be repeated provided local measured leakage reductions achieved by repairs of individual leaks reduce the containment's overall measured leakage rate sufficiently to meet the acceptance criteria. The test, therefore, was successful by the rules which were in effect at the time. Commitment to the 1973 Appendix J was made on 11-9-77 and in our response to Inspection Report No. 78-01.
2. The testing which followed the Steam Generator Replacement Project was essentially preoperational. As explained in Section 2, paragraph D of the revised report on the Unit 2 ILRT, a construction related deficiency (holes drilled in the containment liner) was responsible for the unsuccessful test attempts. All other Type B & C leakage after the unsuccessful attempts was minimal.
3. Ultimately, the Type A following SGRP passed with a rate of 0.3 La. It is our position that increasing the frequency of the CILRT will not necessarily provide greater assurance of containment integrity, especially since appropriate corrective action has been effected as demonstrated during the successful 1981 Unit 1 SGRP construction outage and subsequent Type A test.

A017  
S  
1/1

A thorough study of Type B and C test procedures was conducted by Stone & Webster following the Unit 1 Type A test. It was determined that additional testing is required. This additional testing will provide higher levels of confidence in Type B & C testing performed each refueling in the interims between future Type A tests. A summary of this additional testing is provided in Attachment I.

8111030275 811029  
PDR ADOCK 05000280  
P PDR

VIRGINIA ELECTRIC AND POWER COMPANY TO Harold R. Denton

In summary, we feel that established levels of quality and confidence in containment capability will not be compromised by this one time exemption to the requirements of Appendix J.

If you have any further questions, please advise. Your timely response is requested as commitment of funds and scheduling of the Unit 2 refueling outage are affected.

Very truly yours,



R. H. Leasburg

Attachment

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

ATTACHMENT I

The following valves were not previously subjected to local leakage tests at refueling frequency. These potential leakage paths will be incorporated into existing Type B and C test procedures as soon as possible. Some hardware modifications may be required to provide this capability. (Unit 1 similar)

TYPE B

FUEL TRANSFER TUBE

TYPE C

2-CC-242	RV-CC-207
2-CC-58	TV-CC-201A
2-CC-59	TV-CC-201B
2-CC-1	TV-CC-201C
2-CC-224	TV-CC-205A
2-CC-233	TV-CC-205B
2-CC-209A	TV-CC-205C
2-CC-209B	
2-CC-176	
2-CC-177	