VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

R. H. LEASBURG
VICE PRESIDENT
NUCLEAR OPERATIONS

May 17, 1982

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. 227
NO/DWL:acm
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT NOS. 1 AND 2
RESPONSE TO GENERIC LETTER 82-05

In response to Generic Letter 82-05, Vepco has reviewed the status of each NUREG-0737 item identified on Enclosure 1 of the subject generic letter. The items identified in that enclosure are those items which had implementation dates between July 1, 1981 and March 1, 1982. Certain items in this time frame were not included in Enclosure 1 of Generic Letter 82-05 since they were currently under some form of NRC review or resolution. These later items were identified in Enclosure 2 of Generic Letter 82-05. Of the seven (7) Enclosure 1 items reviewed, three (3) items have met the requirements specified in NUREG-0737 and are documented as such in the Vepco document titled "Response to NUREG-0737 Post-TMI Requirements". These completed items are: I.A.3.1 (Simulator Exams), II.B.4 (Training for Mitigating Core Damage), and II.E.4.2 (Containment Isolation Dependability). Vepco's "Response to NUREG-0737", was transmitted to the NRC staff for review via Letter No. 985 dated December 15, 1980. Since the original transmittal of this document, Vepco has twice updated our schedule (and subsequently our response) via Letter Nos. 358 and 655 dated June 18, 1981 and December 9, 1981, respectively.

In our letter dated April 16, 1982 (Serial No. 182) we stated that Item II.E.1.2 (Auxiliary Feedwater Initiation and Flow Indication) was complete for the Surry Power Station. This statement was in error and is corrected herein.

The four (4) remaining items, II.B.2 (Plant Shielding), II.B.3 (Post-Accident Sampling), II.E.1.2 (Auxiliary Feedwater Initiation and Flow Indication), and II.F.1 (Accident Monitoring Instrumentation) are all in various stages of completion. Although each of these items was scheduled in NUREG-0737 for completion by January 1, 1982, (except Item II.E.1.2 which was due July 1, 1981) Vepco has provided, by letter and by updates to our "Response to NUREG-0737", formal notification of our intent to establish realistic target dates for the completion of these items. Extensions past the NUREG-0737 implementation dates were necessary as a result of equipment delivery problems, outage scheduling, and, in some cases, the unavailability of environmentally qualified components and/or vendor supplies and support.

The attachment to this letter provides the current status of items II.B.2, II.B.3, II.E.1.2, and II.F.1 (Parts 1 through 6). Each status provided will include the currently expected completion schedule, justification for that

A046
S.1/1

schedule, and a statement of interim actions currently in effect. In most cases, the dates provided in the attachment exceed the most recent documented schedules for completion. This results from taking a thorough, realistic look at the details of work remaining and at the delivery and construction schedules. An update to our "Response to NUREG-0737" is planned for mid-June 1982. This new information will be included in that update.

Please contact us if you require additional information regarding the status of the NUREG-0737 items identified in Generic Letter 82-05.

Very truly yours,

R. H. Leasburg

Attachments

cc: Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulation Commission
Atlanta, Ga. 30303

Mr. Steven A. Varga, Chief
Operating Reactor Branch No. 1
Division of Licensing
U. S. Nuclear Regulation Commission
Washington, D. C. 20555

COMMONWEALTH OF VIRGINIA)
)
CITY OF RICHMOND)

The foregoing document was acknowledged before me, in and for the City and Commonwealth aforesaid, today by R. H. Leasburg, who is Vice President-Nuclear Operations, of the Virginia Electric and Power Company. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 17th day of May, 19 82.

My Commission expires: 2-26, 19 85.

Ann C. McGee
Notary Public

(SEAL)

SURRY POWER STATION

NUREG-0737, Item II.B.2
Design Review of Plant Shielding and Environmental Qualification of Equipment for Spaces/Systems Which May Be Used in Post-Accident Operations

The requirements of Item II.B.2 have been met for Surry Power Station except for the following items:

The control valves required to automatically adjust service water to the charging pump lube oil cooler have been installed and only final system testing remains to be done. This testing will be completed prior to July 1, 1982.

Replacement of LMC drain valves and the valve seat replacements on the containment isolation trip valves for the primary drain tank are complete on Unit 1. For Unit 2, only the LMC drain valve replacement is complete. The Unit 2 work on containment isolation trip valve seat replacements will be completed by July 1, 1982.

The slippage past January 1, 1982 of these items was due to material procurement and delivery problems. Accordingly, NUREG-0737, Item II.B.2 allowed an automatic extension of the implementation date to no later than July 1, 1982. We plan, as indicated above, to comply with Item II.B.2 within this schedule.

An additional item is the environmental qualification of the service water radiation monitoring pumps and motors. These pumps and motors will be replaced with qualified pumps and motors in accordance with our response to I&E Bulletin 79-01B on a schedule consistent with the proposed rule on EQ (Federal Register Notice dated Wednesday, January 20, 1982 - Vol. 47, No. 13) which requires qualification no later than the second refueling outage after March 31, 1982. Qualified pumps and motors have been ordered and our intent is to complete the installation in Spring of 1983. Presently, the service water radiation monitoring pumps and monitors have been reconfigured (criss-crossed) such that the Unit 1 pumps supply monitors located on the Unit 2 side and vice versa. It is believed that this approach meets the intent of the II.B.2 requirement by providing adequate shielding (via distance) to the service water radiation monitors. The shielding requirements for the pumps and motors will be met upon completion of their installation.

NUREG-0737, Item II.B.3
Post-Accident Sampling System

The Reactor Coolant Sampling System at Surry will be operational by July 1, 1982. Vendor delays resulted in schedule delays past January 1, 1982. Some system components were received in late 1981. Currently, the Reactor Coolant Sampling System is installed and is undergoing final startup testing. Interim sampling procedures as required by the short-term TMI requirements will be in effect until this system is fully operational.

The Containment Atmosphere Sampling System at Surry will be operational no later than January 1, 1983. At present, all sampling and analysis equipment is installed and is undergoing startup testing. The schedule extension is required since the installation of permanent supply and sample

lines for the Containment Atmosphere Sampling System is not complete. The delay in the installation of the sample lines resulted from the need to redesign and reroute portions of the lines to accomodate heat tracing and to accomodate recent concerns associated with Iodine plateout. Also, there have been procurement difficulties with the heat tracing materials and control circuitry. The interim sampling procedure required by the short-term TMI requirements will be in effect until the permanent Containment Atmosphere Sampling System is operational.

NUREG-0737, Item II.E.1.2
Auxiliary Feedwater Initiation and Flow Indication

Part 1 of Item II.E.1.2 deals with the automatic initiation of the Auxiliary Feedwater System. All requirements for this part have been reviewed by NRC Staff and consultants and have been closed out with the exception of the requirement for bypass indication of the motor-driven AFW pumps. In our letter to the NRC dated October 8, 1981 (Serial No. 507) Vepco committed to provide continuous bypass indication of these pumps in accordance with IEEE 279-1971, paragraph 4.13, during the Spring, 1982 maintenance outage for Surry Unit 2 and the next refueling outage for Surry Unit 1.

Completion of part 1 of Item II.E.1.2 exceeds the implementation date of July 1, 1981 as a result of clarification of the bypass indication requirement subsequent to the NRC Staff/consultant review of our earlier submittals.

Part 2 of Item II.E.1.2 deals with flow indication for the Auxiliary Feedwater System. All requirements of this part have been met except for the environmental qualification of the AFW flow transmitters. When available, qualified transmitters will be provided in accordance with our response to I&E Bulletin 79-01B on a schedule consistent with the proposed Rule on Environmental Qualification (Federal Register Notice dated Wednesday, January 22, 1982-Vol. 47, No. 13) which requires completion no later than the second refueling outage after March 31, 1982.

NUREG-0737, Item II.F.1
Accident Monitoring Instrumentation

Parts 1 and 2 of Item II.F.1 deal with noble gas, iodine and particulate effluent monitoring. In our letter of April 1, 1982 (Serial No. 206), we indicated all required construction and installation related activities for the effluent monitoring systems were complete. Subsequent to the issuance of this letter we have determined that an electric heat tracing system is required on the Process and Vent Effluent Monitoring System sample line in order to assure proper operability. Installation of the heat trace system has always been planned but was previously not identified as being required for operability.

Presently, the only outstanding items on this item are the heat tracing system and startup testing for the Process and Vent Effluent Monitoring System, and the in-situ calibration and startup testing of the Steam Driven Auxiliary Feedwater Pump Exhaust Effluent Monitoring System. The upgrade to the Main Steam Effluent Monitoring System is installed and operational. The remaining

work on the effluent monitoring systems will be completed by January 1, 1983. The schedule extension is necessary to accomodate delays in the heat tracing system delivery until late Summer 1982. The effluent monitoring system installed for the short-term TMI requirements is available and will be used as an interim measure until the increased range effluent monitors of Item II.F.1, parts 1 and 2 are operational.

Part 3 of Item II.F.1 deals with the Containment High Range Radiation Monitors. This system has been installed and tested. The system is not considered fully operable yet since the final in-situ calibration has not been performed. The vendor of this system (Victoreen) does not have equipment, procedures, or sources acceptable to perform this calibration. Victoreen is expediting the development and procurement of a calibration system. Vepco has not received a commitment from Victoreen as to when calibration services will be available to us. Therefore, our commitment on this item is to perform the in-situ calibration during the first scheduled outage after availability of a calibration system to Vepco.

The in-containment electrical terminations for the Containment High Range Monitors have been made using temporary termination procedures. This is because environmentally qualified terminations are not available at this time. Qualified terminations will be provided in accordance with our response to I&E Bulletin 79-01B on a schedule consistent with the proposed Rule on Environmental Qualification (Federal Register Notice dated Wednesday, January 20, 1982-Vol. 47, No. 13) which requires completion no later than the second refueling outage after March 31, 1982.

Parts 4 and 5 deal with Containment Pressure Monitors and Containment Water Level Monitors, respectively. These systems have been installed and tested and are currently operational. Each of these items, however, are currently utilizing transmitters which have not been environmentally qualified. However, the best available transmitters are being used in the interim. Qualified transmitters will be provided in accordance with our response to I&E Bulletin 79-01B on a schedule consistent with the proposed Rule on Environmental Qualification (Federal Register Notice dated Wednesday, January 20, 1982-Vol. 47, No. 13) which requires completion no later than the second refueling after March 31, 1982.

Part 6 of Item II.F.1 deals with Containment Hydrogen Monitors. The new Hydrogen Monitors are installed and tested but are not connected to permanent sample supply and return lines. The delay on the construction of these sample lines has resulted from the necessity to redesign the supply lines to accomodate heat tracing to assure proper operation of the monitors under expected conditions and the necessity to redesign the return lines to meet seismic criteria. There have been delays in procurement of a qualified heat trace system, however, the system is presently on order and we anticipate the system being delivered by late Summer 1982. The completed system will be installed by January 1, 1983.

In the interim measure, the new hydrogen analyzers which are installed will be utilized by connecting them to existing containment air sample lines.