

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

R. H. LEASBURG  
VICE PRESIDENT  
NUCLEAR OPERATIONS

June 30, 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. 388  
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 82-10

In response to Generic Letter 82-10, Vepco has reviewed the status of each NUREG-0737 item identified in the enclosure to the subject generic letter. The items addressed in Generic Letter 82-10 are those which have implementation schedules after March 1, 1982.

The attachment to this letter provides the current status of the NUREG-0737 items identified in Generic Letter 82-10 except for those items where "no reply needed" was noted. Vepco's proposed implementation schedules for the currently open items addressed by the generic letter are provided in the attached response except for Items III.A.1.2 (Upgrade Emergency Response Facilities) and III.A.2 (Improved Licensee Emergency Preparedness - Long Term). These two response exceptions were necessary since the total scope of work for these items is still not finalized. Accordingly, a realistic estimate for completion of the Emergency Response Facilities is not available at this time. Our plans and schedules will be provided to the NRC when this information is available and firm.

Please contact us if you require additional information regarding the status of the NUREG-0737 items addressed by this letter.

Very truly yours,



R. H. Leasburg

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

Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing  
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COMMONWEALTH OF VIRGINIA )  
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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 1<sup>st</sup> day of JULY, 19 82.

My Commission expires: 31 MARCH 3, 19 86.

  
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Notary Public

(SEAL)



SURRY POWER STATION  
RESPONSE TO GENERIC LETTER 82-10

NUREG-0737, ITEM I.A.1.3  
SHIFT MANNING

Item I.A.1.3 deals with overtime limits and minimum shift crew requirements. This item is complete for Surry.

Technical Specifications, Section 6.1, for both Surry Units require a minimum shift crew and overtime restrictions in accordance with the requirements of I.A.1.3.

The most recent NRC Policy Statement regarding overtime limits (which is presented in Generic letter 82-02 dated February 8, 1982) is less restrictive than the overtime limits previously provided in Item I.A.1.3. Currently, the NUREG-0737 requirements of Item I.A.1.3 are in effect at Surry; therefore, we are in compliance with the overtime limits detailed in Generic letter 82-02.

NUREG-0737, ITEM I.C.1  
GUIDANCE FOR THE EVALUATION AND DEVELOPMENT OF PROCEDURES  
FOR TRANSIENTS AND ACCIDENTS

On December 15, 1980, the Westinghouse Owners Group submitted a detailed description of a program to comply with the requirements of I.C.1 for both Inadequate Core Cooling and Transients and Accidents (Ref: Letter No. OG-47). This submittal identified previous Owners Group submittals to the NRC, which are believed to comprise the bulk of the required information. Additional effort required to obtain full compliance with Item I.C.1 (with a proposed schedule for completion) was also identified. Additionally, on March 18, 1981, an update of the status of the Owners Group I.C.1 activities was submitted to the the NRC (Ref: Letter No. OG-54). This approach was discussed during a November 12, 1980 meeting between Westinghouse Owners Group representatives at the NRC Staff, and is consistent with the alternate requirements on page I.C.1-4.

The NRC review of the Westinghouse Owners Group proposed program (OG-54) identified several NRC Staff concerns. These concerns were outlined in a letter from Mr. Robert A. Clark (dated June 9, 1981) to Mr. J. H. Ferguson of Vepco. In response, the Westinghouse Owners Group evaluated and revised its procedures development program and forwarded to the NRC a revised program on July 7, 1981 by letter from Mr. R. W. Jurgenson (AEP, Owners Group Chairman) to Mr. S. H. Hanauer of the NRC (Ref: Letter No. OG-61). This revised program was received and considered acceptable by the NRC. NRC acceptance of the Owners Group revised program is documented in a letter from Mr. D. G. Eisenhut to Mr. R. W. Jurgenson dated September 18, 1981.

On November 30, 1981, the Westinghouse Owners Group submitted a 4-volume set of Emergency Response Guidelines (ERG's). These ERG's were transmitted by letter No. OG-64 from Mr. R. W. Jergenson to Mr. D. G. Eisenhut. The ERG set contained the majority of the generic procedures developed by the Owners Group. The remaining ERG's (several Function Restoration Guidelines, FRG's) will be sent to the NRC in the Summer of 1982.

The NRC Staff is currently reviewing the submitted ERG's. Upon completion of the staff's review of the total ERG set, Vepco will implement revised plant specific Emergency Procedures modeled after the ERG's. Our schedule at this time (assuming completion of NRC review in late '82 or early '83) is to implement these revised procedures during the Fall '83 North Anna 1 refueling outage for the North Anna Power Station and the Spring '83 Surry 1 refueling outage for Surry Power Station.

NUREG-0737, ITEM I.D.1  
CONTROL ROOM DESIGN REVIEW

No reply necessary as per Generic Letter 82-10.

NUREG-0737, ITEM I.D.2  
SAFETY PACEMETER DISPLAY SYSTEM

No reply necessary as per Generic Letter 82-10.

NUREG-0737, ITEM II.B.1  
RCS VENTS

No reply necessary as per Generic Letter 82-10.

NUREG-0737, ITEM II.B.2 (Part 3)  
PLANT SHIELDING-ENVIRONMENTAL QUALIFICATION

No reply necessary as per Generic Letter 82-10.

NUREG-0737, ITEM II.D.1  
PERFORMANCE TESTING OF POWER RELIEF VALVES AND SAFETY VALVES

By letters dated April 1, 1982 (Serial No. 196 for Surry), Vepco submitted, by reference, the PWR safety and relief valve test program results. A preliminary assessment regarding adequacy of the installed safety and relief valves was also provided in the April 1, 1982 letter. The plant-specific assessment of the installed safety and relief valves will be provided by July 1, 1982. The July 1, 1982 submittal will also address the status of the discharge piping evaluation for the Surry units. The piping evaluation and the plant-specific PORV block valve report will not be complete prior to July 1, 1982. The piping evaluations for Surry depend on the results obtained from

the options being evaluated for North Anna Unit 2. The North Anna Unit 2 evaluation is expected to be complete by January 1, 1983. At that time, the course of action for the Surry piping evaluations will be decided. Vepco will inform the NRC at that time regarding schedules for the Surry evaluations.

A plant-specific evaluation of installed PORV block valves will be provided by September 1, 1982 for both Surry units.

NUREG-0737, ITEM II.F.2  
INSTRUMENTATION FOR DETECTION OF INADEQUATE CORE COOLING

No reply necessary as per Generic Letter 82-10.

NUREG-0737, ITEM II.K.3.30  
REVISED SMALL-BREAK LOSS-OF-COOLANT-ACCIDENT METHODS  
TO SHOW COMPLIANCE WITH 10CFR PART 10, APPENDIX K

This item requires that the analysis methods used by NSSS vendors and/or fuel suppliers for small-break LOCA analysis for compliance with Appendix K to 10 CFR Part 50 be revised, documented, and submitted for NRC approval.

Vepco supports the Westinghouse position that the small-break LOCA analysis model currently approved by the NRC is conservative and in conformance with Appendix K to 10 CFR Part 50. However, as documented in Westinghouse letter No. NS-TMA-2318 dated September 26, 1980, Westinghouse believes that improvement in the realism of small-break calculations is a worthwhile effort and has committed to revise its small-break LOCA analysis model to address NRC concerns (e.g., NUREG 0611, NUREG 0623, etc.). This revised Westinghouse model was scheduled for submittal to the NRC by April 1, 1982 as documented in Westinghouse letter No. NS-EPR-2524 dated November 25, 1981.

On March 26, 1982, Westinghouse submitted the draft WCAP-10054 titled "Westinghouse Small Break ECCS Model" to the NRC for review (Reference letter No. NS-EPR-2581). As indicated in the March 26, 1982 letter, the final version of WCAP-10054 is due to the NRC in mid-Summer 1982. Following NRC Staff review of WCAP-10054, it is anticipated that the Staff will issue formal documentation of their review and approval of the Westinghouse small break models. Such formal documentation will initiate work on Item II.K.3.31.

NUREG-0737, ITEM II.K.3.31  
PLANT-SPECIFIC CALCULATIONS TO SHOW COMPLIANCE WITH  
10CFR Part 50.46

The plant-specific small-break LOCA reanalyses will be based on the revised small break models developed under Item II.K.3.30. These reanalyses will be submitted within one year following acceptance of the revised models by the NRC. (Refer to response for Item II.K.3.30.)

NUREG-0737, ITEM III.A.1.2  
UPGRADE EMERGENCY RESPONSE FACILITIES

Item III.A.1.2 deals with staffing levels for emergency situations and with the upgrade of the Emergency Response Facilities (ERF's). The staffing requirements for emergency situations have been met and are currently implemented by the Surry Emergency Plans. Although staffing requirements are met, the current Emergency Plan does not meet the response time (staging) requirements of Item III.A.1.2 (ref. NUREG-0654, Rev. 1; Table B-1). The current Plan requires necessary emergency response personnel to be at their appropriate locations within 60 minutes instead of the 30 and 60 minute staging requirements of III.A.1.2. The "on-shift" staffing requirement has been met. A revision to the Surry Emergency Plan is in progress and will be submitted to the NRC during August, 1982. Once the revised plan is in effect, all staffing and staging requirements of Item III.A.1.2 will be met.

The major requirement of Item III.A.1.2 is the upgrade of the Emergency Response Facilities per the guidance of NUREG-0696 "Functional Criteria for Emergency Response Facilities." Vepco will not meet the October 1, 1982 implementation schedule of Item III.A.1.2. The total scope of the ERF upgrade is currently undefined. The design information and updates provided in our letters of December 18, 1980 (Serial No. 1008), June 1, 1981 (Serial No. 312) and April 8, 1982 (Serial No. 102) is being re-evaluated. Additionally, the interaction between the ERF upgrade, control room design review (Item I.D.1), and SPDS installation (Item I.D.2) is currently being reviewed to determine the scheduler aspects of integrating these projects into an effective, implementation plan. This planning effort is further complicated by the uncertainty associated with the draft document SECY-82-111 "NRC Staff Recommendations on the Requirements for Emergency Response Capability" which proposes an interaction and priority to the many aspects of the emergency response requirements.

With the uncertainties remaining in the regulatory requirements and the interaction of these requirements, Vepco is unable at this time to provide a realistic firm commitment regarding compliance with the ERF upgrade of Item III.A.1.2. Once the above uncertainties are resolved, Vepco will provide an update to the ERF design information previously provided as well as an implementation schedule for the ERF upgrade. In the interim, the existing emergency response capabilities and staffing levels will be maintained.

NUREG-0737, ITEM III.A.2  
IMPROVED LICENSEE EMERGENCY PREPAREDNESS - LONG TERM

Item III.A.2 deals with the upgrades of Radiological Emergency Response Plans and improved meteorological data capabilities. The Surry Radiological Emergency Plan was submitted for review on June 16, 1980. The first amendment to the Plan was submitted on January 2, 1981. Therefore, the requirements to submit a Radiological Emergency Response Plan has been met for the Surry Power Station.

The Emergency Plan Implementing Procedures for Surry are currently being revised. These revisions will be submitted for review by the NRC Staff in August, 1982.

A meteorological measurements program which incorporates the features of both element 1 and 2 of Appendix 2 of NUREG 0654, Rev. 1, including the display of data in the control room, is operational. An operable dose calculational methodology (DCM) is currently available for emergency use.

Implementation of element 3, Real-Time Predictions of Atmospheric Effluent Transport and Diffusion, and element 4, Remote Interrogation of the Atmospheric Measurement at Prediction Systems, is related to the installation of equipment to meet the requirements of NUREG 0696, "Functional Criteria for Emergency Response Facilities." Installation of equipment required by NUREG 0696, including new computer capabilities, will not be complete prior to July 1, 1982. (See Item III.A.1.2). Consequently, milestone 4, which requires installation of Emergency Response Facility hardware and software by March 1, 1982, must be modified to be consistent with the extended schedule of NUREG 0696. At that time, the Class A model should be available, in accordance with milestone 5. Further modifications to the Class A model will take place on a schedule to be determined based on discussions with the NRC Staff. Implementation of the Class B model will depend on the resolution of current regulatory issues pertaining to the Class B model.

NUREG-0737, ITEM III.D.3.4  
CONTROL ROOM HABITABILITY REQUIREMENTS

The control room habitability review for Surry Units 1 and 2 has been completed. We submitted an analysis of habitability with respect to all on-site hazards on January 19, 1981 (Serial No. 036). The special case study of chemical shipments along the James River was submitted on June 30, 1981 (Serial No. 036A). In the later submittal, Vepco agreed to make several modifications which resulted from the habitability reviews by early 1983. However, due to long lead times on procurement of some necessary materials, it is now anticipated that the following modifications to the Surry control room will be complete by December 31, 1983:

- a. Install a redundant control room bottled air system.
- b. Install redundant control room isolation dampers in the normal supply and exhaust ducts.
- c. Replace sodium analyzers which utilize dimethylamine gas with sodium analyzers which do not utilize dimethylamine gas.
- d. Install chlorine gas detectors at the control room air intake.