

R. H. LEASBURG VICE PRESIDENT NUCLEAR OPERATIONS July 23, 1982

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

NO/SWB:ms Docket Nos. 50-280 50-281 License Nos. DPR-32 DPR-37

Serial No. 439

Washington, D. C. 20555

Gentlemen:

APPENDIX R TO 10CFR50 EXEMPTION REQUEST

In a telephone conversation between Don Neighbors and E. R. Smith, Jr, July 19, 1982, the NRC requested Vepco to file for an exemption to Appendix R to 10CFR50.48, paragraph IIIG.3.b requirement of "fixed fire suppression system" in the control room and Units 1 and 2 emergency switchgear rooms. Vepco installed standpipes and hose racks to comply with the Surry Power Station Fire Protection Safety Evaluation Report dated September 19, 1979 to provide fire fighting capability in the control room and the emergency Vepco considers standpipes and hose racks to be "fixed switchgear rooms. fire suppression systems" and therefore complies with the requirement of Appendix R.

In view of the above, Vepco requests an exemption to the requirement of "fixed fire suppression systems" in the control room and the Unit 1 and 2 switchgear rooms interpretated by your staff to mean some type of automatic fixed fire suppression system. The installed hose standpipes provide the best possible fire suppression for these areas and the installation of an automatic fire suppression system in these areas would not enhance fire protection safety above that provided and may be detrimental to overall facility safety.

If you have any questions, please contact us.

Very truly yours,

Office of Inspection and Enforcement

cc: Mr. James P. O'Reilly, Regional Administrator

Region II

Atlanta, Georgia 30303

Mr. Richard C. DeYoung, Director Office of Inspection and Enforcement

Washington, D. C. 20555

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