VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

January 9, 1985

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. 761A
NO/JDH:acm
Docket No. 50-281
License No. DPR-37

Dear Mr. Varga:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT NO. 2
PROPOSED TECHNICAL SPECIFICATION CHANGE-SUPPLEMENT

In our letter dated January 4, 1985 (Serial No. 761), the Virginia Electric and Power Company requested an amendment, in the form of changes to the Technical Specifications, to Operating License No. DPR-37 for Surry Power Station Unit No. 2. The proposed change pertains to the extension of the current visual inspection interval for inaccessible snubbers in Unit 2 from no later than February 1, 1985, to the 1985 Unit 2 refueling outage, currently scheduled for March 22, 1985 - a period of fifty days.

During subsequent telephone discussions on January 8, 1985, involving the NRC Surry Project Manager, yourself, and Mr. R. J. Hardwick and others of Vepco, you expressed concerns regarding the level of assurance, as described in our original submittal, regarding snubber operability during the intervening fifty day period. As we stated during those discussions, the overwhelming majority of snubber failures at Surry detected by visual inspections have been the result of low snubber reservoir fluid level. This condition can easily be observed during a visual inspection. Therefore, in addition to the assurance we believe has already been provided as a result of the recent Surry snubber upgrade program, and the very low probability of a seismic event during the intervening fifty days, Vepco commits to provide additional assurance of snubber operability by conducting a limited visual inspection.

The inspection will consist of a visual inspection, to the extent practicable, of snubbers inside containment that are accessible without the use of scaffolding, climbing, or ladders. In addition, snubbers located in areas which would result in excessive personnel radiation exposures (as determined by Surry Health Physics) would be excluded. The visual inspection will verify adequate fluid level in snubber reservoirs. It is anticipated that an inspection under the above conditions would still result in verification of a significant number (approximately 30 percent) of snubbers inside containment.

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The limited visual inspection will be conducted during the inspection interval currently required by the Technical Specifications, i.e., no later than February 1, 1985. In the event a snubber is identified which does not meet the visual inspection criteria, the actions specified in Technical Specifications 3.20.B and 3.20.C will apply.

We believe that this additional action will provide the assurance necessary to demonstrate that this one-time extension of the surveillance interval has no adverse impact on plant safety and should be issued. If you have any further questions or require additional information, please contact us immediately.

Very truly yours,

W. L. Stewart

cc: Mr. J. P. O'Reilly
Regional Administrator
NRC Region II

Mr. D. J. Burke
NRC Resident Inspector
Surry Power Station

Mr. C. Price
Department of Health
109 Governor Street
Richmond, Virginia 23219

Mr. John Olshinski
NRC Region II

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 W. R. Cartwright who is Manager-Nuclear Operations Support, 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 9th day of January, 19 85.

My Commission expires: 2-26, 19 85.

Ann C. Mesa
Notary Public

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