

May 10, 1985



VIRGINIA POWER

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. 85-123A
BSD/ect:2008N
Docket Nos.: 50-280
50-281
License No.: DPR-32
DPR-37

Gentlemen:

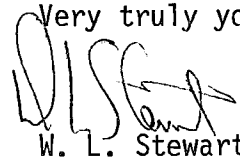
VIRGINIA POWER
SURRY POWER STATION UNITS 1 AND 2
CONFORMANCE WITH REGULATORY GUIDE 1.97

Virginia Power letter, Serial No. 053, dated January 31, 1984, provided detailed descriptions of our conformance to Regulatory Guide 1.97 Revision 3. Your letter, dated February 19, 1985, requested further information regarding certain items.

The attachment to this letter addresses your request for further information for your items 2, and 8 through 15.

If you have any questions, or need additional information to complete your review, please contact us.

Very truly yours,



W. L. Stewart

Attachment

cc: Dr. J. Nelson Grace
Regional Administrator
Region II

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

8505150166 850510
PDR ADOCK 05000280
F PDR

A003
11

SURRY REG. GUIDE 1.97 RESPONSE

NRC POSITION

2. RCS Pressure -- the licensee should install Category I instrumentation for this variable (Section 3.3.1).

VIRGINIA POWER RESPONSE

2. Virginia Power has replaced the transmitters associated with this variable with seismically and environmentally qualified equipment, which satisfies this request.

NRC POSITION

8. Pressurizer level -- the licensee should provide a redundant channel of instrumentation (Section 3.3.5).

VIRGINIA POWER RESPONSE:

8. In our previous response for Item A-13, Pressurizer Level, we stated that redundant instrument channels were available. Although not stated in our January 31, 1984 letter, Serial No. 053, redundancy is provided for Item D-12 by virtue of redundancy provided for Item A-13. A revision to our January 31, 1984 letter will be forwarded at a later date. As a note of further clarification, the "density compensation" referenced in Section 3.3.5 will be provided procedurally by Virginia Power.

NRC POSITION

9. Pressurizer Heater status -- the licensee should provide the recommended instrumentation for this variable (Section 3.3.6).

VIRGINIA POWER RESPONSE:

9. Virginia Power will install kw indication in lieu of current in amperes to comply with Regulatory Guide 1.97, Revision 3, during the upcoming refueling outages scheduled for 1988. Kw indication is used by the operators to monitor pressurizer heaters. Continued use of this parameter for pressurizer status indication addresses human factors consideration.

NRC POSITION

10. Containment spray flow -- the licensee should install Category 2 spray flow instrumentation with a range in accordance with Regulatory Guide 1.97 (Section 3.3.8).

VIRGINIA POWER RESPONSE

10. Virginia Power will install containment spray instrumentation to meet the requirements of Regulatory Guide 1.97, Revision 3, during the refueling outage scheduled in 1988.

NRC POSITION

11. Containment sump water temperature -- environmental qualification should be addressed in accordance with 10 CFR 50.49 (Section 3.3.9).

VIRGINIA POWER RESPONSE

11. Virginia Power's Emergency Core-Cooling Pumps take suction from the containment sump when the refueling water storage tank reaches a low level. The Containment Recirculation Spray Pumps also take suction from the containment sump. The analysis, performed to meet the criteria of Safety Guide 1, "Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal System Pumps" and to identify the NPSH requirements, established that the pump NPSH is adequate in all conditions. Therefore, indication of containment sump water temperature is not required at Surry.

Accordingly, Virginia Power considers the variable should be reclassified as Category 3 since it is not needed during an accident.

This reclassification is in accordance with understandings between the NRC Staff and the Nuclear Utility Equipment Qualification Group. The reclassification to Category 3 eliminates their requirement to qualify the equipment in accordance with 10 CFR 50.49.

NRC POSITION

12. Component cooling water temperature to ESF system -- the licensee should install Category 2 instrumentation for this variable (Section 3.3.11).

VIRGINIA POWER RESPONSE

12. Virginia Power will in the future modify the component cooling water system to provide Component Cooling Water Temperature indication to ESF System in order to meet the intent of Regulatory Guide 1.97.

The new RTD's will be installed to meet the requirement of Regulatory Guide 1.97 with the implementation of these changes.

Since the design of the piping may be modified due to installation of the new equipment or modification of existing equipment based on our Appendix "R" review, we will delay installation of this modification until the outages scheduled in 1988.

This modification will meet the intent of Regulatory Guide 1.97.

NRC POSITION

13. Component cooling water flow to ESF system -- the licensee should verify that Category 2 instrumentation is being used for this variable (Section 3.3.11).

VIRGINIA POWER RESPONSE

13. Virginia Power will in the future modify the Component Cooling Water System to provide the Component Cooling Water Flow indication to ESF System in order to meet the intent of Regulatory Guide 1.97.

New category 2 flow channels will be installed which will provide information to the Technical Support Center via the Data Acquisition System. This information will also be available for call-up on CRT displays in the Main Control Room.

Since the design of the piping may be modified due to installation of the new equipment or modification of existing equipment based on our Appendix "R" review, we will delay installation of this modification until the outages scheduled in 1988.

This modification will meet the intent of Regulatory Guide 1.97.

NRC POSITION

14. Emergency ventilation damper position -- the licensee should verify that Category 2 instrumentation is being installed for the control room display of this variable (3.3.12).

VIRGINIA POWER RESPONSE

14. Virginia Power will modify the Emergency Damper Position Indication in order to comply with the intent of Regulatory Guide 1.97, Revision 3. Environmentally qualified limit switches will be installed on the Emergency Damper to provide information on open-closed status. This information will be available on CRT displays in the control room, TSC and EOF.

NRC POSITION

15. Status of standby power and other energy sources important to safety (480V buses) -- the licensee should install instrumentation that meets the recommendations of Regulatory Guide 1.97. Environmental qualification should be addressed in accordance with 10 CFR 50.49 (Section 3.3.13).

VIRGINIA POWER RESPONSE

15. Virginia Power has installed but not brought on-line under its Safety Parameter Display System Project instrumentation which meets the requirements of Regulatory Guide 1.97.