

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

September 30, 1986

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attn: Mr. Lester S. Rubenstein, Director  
PWR Project Directorate No. 2  
Division of PWR Licensing-A  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Serial No. 86-577  
NO/JDH/acm  
Docket Nos. 50-280  
50-281  
50-338  
50-339  
License Nos. DPR-32  
DPR-37  
NPF-4  
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNIT NOS. 1 AND 2  
NORTH ANNA POWER STATION UNIT NOS. 1 AND 2  
APPENDIX R EXEMPTION REQUESTS

This letter confirms that the Appendix R exemption requests submitted for the North Anna and Surry Power Stations meet the "special circumstances" criterion specified in a recent change to 10 CFR 50.12. The North Anna exemption requests were originally submitted May 1, 1984 (Serial No. 231), and revised October 31, 1984 (Serial No. 231B), August 21, 1985 (Serial No. 85-457A), and March 21, 1986 (Serial No. 86-065). The Surry exemption requests were originally submitted July 6, 1984 (Serial No. 381) and revised September 12, 1984 (Serial No. 381A), November 30, 1984 (Serial No. 692) and April 10, 1986 (Serial No. 85-781).

10CFR50.12, Specific Exemptions, was amended on December 12, 1985 (see 50FR50764) to clarify the standards applied by NRC when it considers whether to grant exemptions from the requirements of 10 CFR Part 50. Section 50.12(a) was specifically amended to include consideration of exemptions by NRC only when "special circumstances" were present. Six special circumstances were defined in the revised rule. We believe that our exemptions fall under the second criterion, which states: "(ii) Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule."

The underlying purpose of Appendix R is to achieve and maintain an acceptable level of fire protection at licensed nuclear facilities. Our fire protection analyses have demonstrated that purpose can, on occasion, be accomplished by means other than that explicitly specified in Appendix R. In those cases, where the existing plant configuration had been determined to provide an equivalent level of fire protection, we submitted requests for exemption from the applicable section of Appendix R. The analysis accompanying each exemption demonstrates that an acceptable

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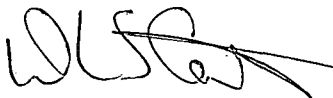
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level of fire protection already exists, thus the underlying purpose of the rule has been achieved.

In the event the regulation is applied, i.e., if the exemptions are denied, it would be necessary to design and install modifications to provide additional fire detection and fire suppression systems, fire barriers, fire doors and dampers, emergency lighting, and instrumentation. Additional dedicated personnel may be required. Engineering and construction support would be necessary to reroute substantial amounts of existing cable and conduit and install fire-rated wrap and conduit seals. Increased surveillance, test and maintenance effort would be necessary to support the new or augmented systems. Overall, these changes would require a significant expenditure of engineering, construction, and operations resources, as well as associated capital costs, which we believe are unnecessary because the modifications would not increase the overall level of protection for safe shutdown equipment.

In summary, the existing plant configuration and associated fire protection features discussed in our exemption requests provide a level of fire protection equivalent to that required by Appendix R. To design and implement additional modifications does not serve the underlying purpose of the rule and is not necessary to achieve the underlying purpose of the rule. We conclude that our exemption requests meet "special circumstances" criterion (ii) of 10 CFR 50.12(a) and should be granted.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. L. Stewart', with a long horizontal flourish extending to the right.

W. L. Stewart

cc: Mr. Albert F. Gibson, Acting Director  
Division of Reactor Projects  
NRC Region II

Mr. W. E. Holland  
NRC Senior Resident Inspector  
Surry Power Station

Mr. J. L. Caldwell  
NRC Senior Resident Inspector  
North Anna Power Station

Mr. Chandu P. Patel  
NRC Surry Project Manager  
PWR Project Directorate No. 2  
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Mr. Leon B. Engle  
NRC North Anna Project Manager  
PWR Project Directorate No. 2  
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