

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

September 12, 1988

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Serial No. 88-371  
NO/JDH:vlh R1  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNITS 1 AND 2  
GENERIC LETTER 87-11

Generic Letter 87-11, "Relaxation in Arbitrary Intermediate Pipe Rupture Requirements," dated June 19, 1987, effectively eliminated the requirement to postulate arbitrary intermediate breaks. Under the generic letter, licensees were permitted to take advantage of this relief, provided no technical specifications or license conditions were changed, and no unreviewed safety question was involved.

Acting in accordance with the generic letter, we have been able to eliminate two snubbers from each steam generator which serve solely as pipe whip restraints. These modifications have been completed on Unit 1 and will be implemented on Unit 2 during future outages. As part of the analysis supporting this modification, we determined that no technical specifications were affected and that no unreviewed safety question was involved. We examined existing license conditions and confirmed that they were not affected. In particular, we paid close attention to a license condition, dated June 16, 1986, which permitted us to implement leak-before-break (LBB) technology.

The LBB license condition references three Virginia Electric and Power Company letters. During the course of our review, we identified an error in a table in one of the letters. Specifically, in the letter dated January 14, 1986 (Serial No. 85-136C), Table 2A, "Factor of Safety for Component Support under Combined Loads," incorrectly states the factor of safety for the steam generator lower support hanger rods, both before and after LBB, as 1.8. The correct factor of safety, both before and after LBB, is 1.7. After implementing the above-mentioned design change permitted under Generic Letter 87-11, the factor of safety remains 1.7.

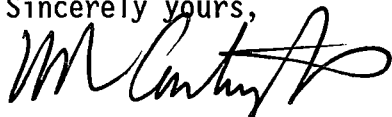
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We have informed the NRC Surry Project Manager of this discrepancy in Table 2A of the referenced letter during his visit to Surry the week of May 23, 1988 and agreed to provide a letter documenting our finding. We also briefed him on the actions we are taking in accordance with the Generic Letter 87-11. In addition to providing a summary of the change in our monthly operating report and revising the UFSAR to reflect the change (as specified in Generic Letter 87-11) after the modifications are completed, we also offered to meet with the NRC staff, if necessary, to further discuss these items.

If you have any questions, or would like to arrange a meeting, please contact us.

Sincerely yours,



W. R. Cartwright  
Vice President - Nuclear

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