

Hand Delivered

September 22, 1998

Mr. L. Samuel Lilliard
Office of Spill Response and Remediation
Virginia Department of Environmental Quality
629 East Main Street
Richmond, VA 23240-0009



VIRGINIA POWER

**Re: AST REGULATIONS EXTENDED COMPLIANCE SCHEDULE – SURRY
NUCLEAR POWER STATION (ODCP NO. FC-04-3535)**

Dear Mr. Lilliard:

In accordance with section 9VAC 25-91-40.B of the Facility and Aboveground Storage Tank (AST) Regulations, Virginia Power is requesting approval for an extended compliance schedule for specific provisions of Part III (9 VAC 25-91-130, Pollution Prevention Requirements) for Surry Nuclear Power Station. The facility has an aggregate oil storage capacity of less than 1 million gallons. The specific provisions and proposed compliance dates are as follows:

- Inventory control and testing for significant variations (9 VAC 25-91-130.B.1) will be completed by September 30, 1999. The major portion of the work required to comply consists of revising procedures and reviewing instrumentation systems.
- Safe fill and shutdown practices (9 VAC 25-91-130.B.3) will be completed by September 30, 1999. The major portion of the work required to comply includes procedural and possible equipment modifications.
- Visual daily and weekly inspections (9 VAC 25-91-130.B.5) will be completed by February 28, 1999. Most of the provisions of this section are included in existing procedures, however, to include the remaining items will require procedure revisions.
- Training of individuals (9 VAC 25-91-130.B.6) will be completed by September 30, 1999. A program is already in place and the personnel performing inspections are currently trained on the existing procedures. Once the procedures are revised to include the AST provisions, the training program will use the revised procedures in subsequent training sessions. The training must also be incorporated into the operator retraining program.

The primary reason in requesting approval of an extended compliance schedule is the method of operation practiced at the station as required by the NRC and necessitated by the safety concerns related to operating a nuclear power station. In order to assure safe operation of the station we operate through an extensive system of written procedures. In fact, the NRC requires compliance with approved station procedures and it is not appropriate for us to operate systems without an approved procedure in place. To comply with the previously specified provisions of the AST regulation we will need to revise an estimated 60 procedures.

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Following the initial draft incorporating the pollution prevention requirements, each of the procedures must undergo an extensive review and approval process.

Additionally, modification of equipment is anticipated in order to comply with some of the AST requirements. To perform the physical modifications, additional engineering will be required. The development of a Design Change Package (DCP) will be followed by a lengthy approval cycle. Then the actual modifications will be implemented and inspected. Drawings and procedures are then updated to reflect the new conditions. All equipment modifications must be documented and approved per NRC requirements, which requires additional time.

The schedule for implementing these changes (procedural and physical) is also affected by the station undergoing an outage during October and November and again in April and May. Total dedication to the outage is required not only during the actual offline period, but for four to six weeks prior to the outage to prepare. The amount and scope of the major outage activities (e.g., refueling, equipment maintenance and replacements, system inspections) increases the time required to implement the changes.

Please contact Wes Sprouse at 273-3552 with any questions.

Sincerely,



A. W. Hadder

Manager
Environmental Policy & Compliance

Mr. L. Samuel Lilliard

September 22, 1998

Page 3

cc:

U.S. Nuclear Regulatory Commission
Region II

Atlanta Federal Center

61 Forsyth Street, SW

Suite 23T85

Atlanta, GA. 30303

RE: Surry Units 1 and 2

Docket Nos. 50-280/50-281

License Nos. DPR-32/DPR-37

U.S. Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, DC 20555

RE: Surry Units 1 and 2

Docket Nos. 50-280/50-281

License Nos. DPR-32/DPR-37

Mr. R. A. Musser

NRC Senior Resident Inspector

Surry Power Station