

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

April 23, 1996

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Serial No. 96-104  
NL&OS/GDM R3  
Docket No. 50-280  
50-281  
License No. DPR-32  
DPR-37

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**WITHDRAWAL OF PROPOSED LICENSE AMENDMENT**  
**FIRE PROTECTION PROGRAM**

By letter dated January 26, 1993, Virginia Electric and Power Company requested a license amendment for Surry Power Station Units 1 and 2 to relocate the fire protection Technical Specifications to the Updated Final Safety Analysis Report consistent with Generic Letter 86-10. We have since decided to withdraw our license amendment request pending completion of a more detailed review and clarification of the fire protection licensing basis.

Generic Letter 86-10, "Implementation of Fire Protection Requirements," required that a license condition be added to the Unit Operating Licenses that directly referenced the NRC Safety Evaluation Reports (SERs) associated with the fire protection program. Although the proposed license condition would also note that changes to the fire protection program could be made without Commission approval provided the changes would not adversely affect the ability to achieve and maintain safe shutdown, compliance with the license would be defined by the detailed descriptions in the SERs. Upon further review of our fire protection SERs, we concluded that some of the SERs were unnecessarily specific and included detailed information about the fire protection program which was inappropriate as a license condition and direct measure for compliance. Examples of the specificity referenced in the existing SERs include the detailed placement of firehose storage locations and individual fire pump pressure initiation settings.

Due to the specificity of the SERs, we have determined that implementing the requested license amendment could make future fire protection program changes more difficult to process and subject to greater after-the-fact interpretation. Therefore, we request that our proposed license change be withdrawn. We plan to perform a detailed assessment of our existing NRC fire protection SERs and compile the necessary and applicable clarifications to address the issue of specificity.

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Following this review, we intend to submit clarifications as an amendment to the existing submittal and request the NRC reinitiate their review for approval.

Should you have any questions or require additional information, please contact us.

Very truly yours,

A handwritten signature in cursive script, reading "James P. O'Hanlon".

James P. O'Hanlon  
Senior Vice President - Nuclear

cc: U.S. Nuclear Regulatory Commission  
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