VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 27, 1996

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

Serial No. 96-507A
NL&OS/GDM R0
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
EMERGENCY POWER FOR THE SPENT FUEL POOL COOLING PUMPS

By letter dated November 21, 1996 (Serial No. 96-507), we provided information regarding repowering the spent fuel pool (SFP) cooling pumps at Surry Power Station from an emergency power source. However, due to an administrative error in distribution, the first page of the letter that was transmitted was a draft from an internal working copy and should not have been provided. This copy erroneously stated that the implementation of the repowering modification would be completed by the end of 1997. However, as noted below (and in subsequent paragraphs in the original transmittal), we are continuing to evaluate the final engineering design, and are not presently prepared to commit to a specific final design or modification implementation date. This letter supersedes the November 21, 1996 letter in its entirety and should be considered as our response to the issue of providing emergency power to the SFP cooling pumps.

Virginia Electric and Power Company was notified in the NRC's letter dated September 19, 1996, "Resolution of Spent Fuel Storage Pool Safety Issues...," that the staff is planning to perform a plant-specific, safety enhancement backfit analysis for Surry Power Station. It is our understanding that the backfit analysis will be performed to evaluate the provision of emergency power for our SFP cooling pumps. Your letter also noted that we could provide comments on the staff's understanding of the plant design features regarding our SFP cooling pumps, the cost of potential modifications to address the design features, or the existing protection from the above design concern which may be provided by administrative controls or other means.

We have reviewed the NRC's evaluation of Surry's SFP design and note your concern regarding the lack of emergency power for our SFP cooling pumps. We believe our existing design, in conjunction with procedural controls, provides adequate protection to ensure that the stored spent fuel would be properly cooled in the event of a loss of offsite power. However, we have implemented additional measures to provide further

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assurance of SFP cooling capability. Specifically, we have changed the setpoint at which the SFP high temperature alarm would annunciate in the control room from 140°F to 115°F. This provides early warning to the operators of increasing SFP temperature, as well as additional time for the implementation of contingency measures to minimize the temperature rise of the pool. We have also implemented additional procedural controls that provide further actions to be taken to restore cooling to the SFP in the event of a loss of offsite power.

Furthermore, we have performed a conceptual engineering evaluation of various design alternatives for providing emergency onsite power to the SFP cooling pumps to minimize or eliminate the need for contingency measures. The evaluation recommended that a design change be developed to provide emergency power to the SFP cooling pumps. This modification will ensure that emergency power is immediately available to at least one of the pumps in the event of a loss of offsite power and a single failure. We are currently preparing a detailed evaluation to finalize the engineering design, implementation plan and project costs. We will advise you of our proposed design by February 28, 1997. The procedural controls discussed above will remain in place until repowering of the spent fuel pool cooling pumps has been completed, and the applicable operating procedures have been revised.

Considering the availability of procedural controls, the increased sensitivity of personnel to SFP issues and the planned modification to provide emergency power to the SFP cooling pumps, we believe that preparation of a backfit analysis for Surry Power Station is unnecessary.

The commitments made in this letter are listed in the attachment. If you have any questions or require additional information, please contact us.

Very truly yours,

James P. O'Hanlon

James P. O'Hanlon
Senior Vice President - Nuclear

Attachment

cc: U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W.
Suite 2900
Atlanta, Georgia 30323

Mr. R. A. Musser
NRC Senior Resident Inspector
Surry Power Station

Attachment

Commitments Stated or Implied Within This Letter

1. Procedural controls that provide the required contingent actions to be taken to restore cooling to the spent fuel pool in the event of a loss of offsite power will remain in place until repowering of the spent fuel pool cooling pumps has been completed and applicable operating procedures have been revised.

2. We are currently preparing a detailed evaluation to finalize the engineering design, implementation plan and project costs. We will advise you of our proposed design by February 28, 1997.