

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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U.S. Nuclear Regulatory Commission
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Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY AND NORTH ANNA POWER STATIONS
RESPONSE TO GENERIC SER ON
SQUG RESOLUTION OF UNRESOLVED SAFETY ISSUE A-46

On July 29, 1988, the NRC Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment developed by the Seismic Qualification Utility Group (SQUG). The letter to SQUG enclosing the SER requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. By letter dated August 19, 1988 to Mr. Shao, SQUG clarified that the sixty days would expire on October 7, 1988. This letter responds to the NRC request for our plant-specific seismic verification program for Surry and North Anna Power Stations, consistent with the requirements of Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46."

As members of SQUG and the Electric Power Research Institute (EPRI), we have supported the many efforts on which the GIP is based. The SER endorses the methodology and criteria embodied in Revision 0 of the GIP, subject to satisfactory resolution of a number of open issues and NRC comments. Action by SQUG and its contractors is underway to resolve the identified open issues and comments in accordance with the SQUG schedule presented at the August 10-11, 1988 meeting with the NRC staff and included with the SQUG letter to Mr. L. Shao dated August 19, 1988. This schedule projects completion of Revision 1 of the GIP in late 1988 and Revision 2 of the GIP in Spring 1989, contingent upon

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SQUG and NRC agreement on the resolution of the various open issues. Revision 2 of the GIP is the version which is scheduled to contain all of the information necessary to implement the USI A-46 generic letter requirements at SQUG member plants. The final NRC SER Supplement on Revision 2 of the GIP is anticipated by mid-1989.

Virginia Electric and Power Company plans for implementation of the GIP at our Surry and North Anna plants are necessarily preliminary given the current status of and schedule for completion of Revisions 1 and 2 of the GIP and NRC's SER Supplements on the revisions. However, it is our current plan to resolve USI A-46 for our Surry and North Anna plants by implementation of the generic criteria and methodology included in Revision 0 of the GIP, as clarified by the SQUG responses to the NRC SER in SQUG letter to Mr. L. Shao, dated September 22, 1988. Assuming no major changes in the workscope currently envisioned, as described in Revision 0 of the GIP including the criteria to be added for cable raceways, tanks, heat exchangers, and relays, we plan to perform the seismic verification plant walkdown required by the GIP by the conclusion of the second refueling outage after receipt of the final SER Supplement and resolution of all open issues, or the second refueling outage scheduled to start after December 31, 1989, whichever is the later. If the final NRC SER Supplement with no open items is issued by the second quarter of 1989, then the plant walkdowns at Surry and North Anna are expected to be completed by the following dates, based on current outage schedules.

<u>Power Station</u>	<u>End of Second Refueling Outage After December 31, 1989</u>
Surry Unit 1	January 31, 1993
Surry Unit 2	November 30, 1991
North Anna Unit 1	October 31, 1992
North Anna Unit 2	May 31, 1992

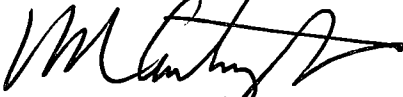
Identification of safe shutdown equipment, gathering of necessary plant-specific data and training of our walkdown team members will be initiated prior to this outage. Walkdown results for each station (both units) will be submitted within six months after the end of the outage in which the last walkdowns (Unit 1 or 2) are completed.

Our current implementation plan and schedule, as described above, are based on the "SQUG Commitments" identified in each section of the GIP. In addition, our implementation and schedule commitment is contingent upon our current understanding of the GIP. If the scope of the final revision of the GIP or the cost and effort required to implement it at our plants change significantly from our current scope and cost estimates, we will reevaluate our schedule. We also desire to integrate the resolution of USI A-46 with the resolution of other related seismic issues (e.g., Eastern Seismicity, Seismic Margins, and Severe Accident Individual Plant External Event Evaluations). Therefore, as other related seismic issues are resolved, if at all possible, we will integrate any new requirements into one single cost-effective program.

However, incorporating these new requirements will require reevaluation and a possible change in the implementation schedule.

We will advise you in writing of any changes in our implementation plans and schedules.

Very truly yours,



W. R. Cartwright

cc: Mr. W. E. Holland
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Surry Power Station

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