

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 22, 1989

90 JAN 2 4 9: 58

Mr. Stewart D. Ebnetter
Regional Administrator
United States Nuclear Regulatory Commission
101 Marietta Street, N. W.
Suite 2900
Atlanta, Georgia 30323

Serial No. 89-865
NO/ETS
Docket Nos. 50-280
License Nos. DPR-32

Dear Mr. Ebnetter

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 1
DISCRETIONARY ENFORCEMENT
REACTOR PROTECTION INTERLOCK LOGIC TESTING

Unit 1 was manually tripped on December 21, 1989 at 2156 after losing a Reserve Station Service Transformer which resulted in the loss of the 1J Emergency Bus. Technical Specification 4.1.A.2 states that the reactor protection interlocks listed in Table 4.1-A shall be demonstrated operable prior to each reactor startup unless performed during the preceding 92 days. The interlocks referenced in Table 4.1-A were last tested on July 3, 1989, preceding Unit 1 startup. The severe cold weather conditions over the eastern seaboard have created a large demand for electricity, significantly reducing reserves. Winter peak load projections had been 11,900 MWs, but the peak on the morning of December 22 was approximately 12,600 MWs and is expected to be about the same for the early evening peak demand. Without the expedited return to service of Unit 1, our system reserves will be exceeded. Due to the far-reaching cold weather, our ability to purchase power will be very limited. Additionally, the severe cold weather reduces the reliability of the other generating stations (fossil and nuclear) and could cause additional forced outages creating even more of a reserve problem. Because the interlock testing takes approximately 5 hours to perform in addition to other activities required for restart, this would not enable Unit 1 to be restarted prior to the evening's peak demand. Therefore we are requesting a one-time discretionary enforcement to allow a unit startup without performing the interlock testing.

The interlock surveillance test was last performed on July 3, 1989. A review of past interlock testing has indicated that the interlocks have had good operational record. The interlocks do not have a history of problems or failures. Additionally, we have not performed any maintenance or modification in these cabinets that could have altered or affected the interlock logic. During a normal reactor startup, the startup procedures include steps to verify the permissive lights are received at the expected power. Otherwise, the startup is halted and the condition is investigated. Additional measures

9001100196 891222
FOR DOCK 05000280
F DIC

OFFICIAL COPY 1/6

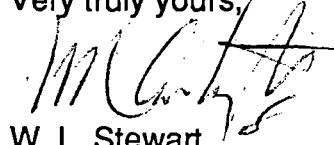
IED 1

will be taken during this startup to monitor the permissive lights (interlocks) and associated equipment. The operating shifts will be briefed about the nonperformance of the interlock testing and alerted to any potential problems; and, an additional qualified person will be added to the shift during this startup for the sole purpose of monitoring the permissive lights and associated equipment.

As discussed in a telephone conversation with your staff on December 22, 1989, Virginia Electric and Power Company was granted discretionary enforcement to restart Unit 1 without performing the interlock testing required by Technical Specification 4.1.A.2.

Should you have any further questions, please do not hesitate to call.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

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

Mr. W. E. Holland
NRC Senior Resident Inspector
Surry Power Station