

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

March 16, 1990

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United States Nuclear Regulatory Commission  
101 Marietta Street, N. W.  
Region II  
Suite 2900  
Atlanta, Georgia 30323

Serial No. 90-148  
NO/ETS R4  
Docket Nos. 50-280  
License Nos. DPR-32

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNIT 1**  
**WAIVER OF COMPLIANCE**  
**CONTAINMENT VACUUM SYSTEM OPERABILITY**

Technical Specification 3.15.B requires that "One mechanical vacuum pump and one associated flow path shall be operable" whenever the reactor is greater than 350° or 450 psig or the reactor is critical. At 8:08 pm on March 15, 1990, both containment vacuum pumps were rendered inoperable. There had been no recent indication of pump degradation during operation, since the pumps had not been required to operate for the past several weeks. The suspected cause of this condition was water in the pump suction lines. Since Technical Specification 3.15 has no action statement, this condition placed the unit in a six hour action statement to hot shutdown. The vacuum pumps are only used to establish and maintain containment partial pressure and do not provide a safety function. One vacuum pump could not be returned to service within six hours and therefore, 72 hours was requested to support activities for the repair.

As discussed in telephone conversations with your staff on March 15 and 16, 1990, Virginia Electric and Power Company requested and was granted a 72 hour waiver of compliance to return the containment vacuum system to operable status. Continued operation of the unit is based on the ability to maintain containment partial pressure within the limits specified in Technical Specification 3.8 and operator attention to containment pressure trends.

The waiver of compliance does not constitute a significant hazards consideration, in that the system is not providing a safety function and therefore does not impact any accident analyses or reduce the margin of safety of any Technical Specification. The basis for the containment vacuum system is the containment partial pressure required in Technical Specification 3.8. Since the proposed waiver does not alter any safety functions or accident analysis assumptions, there are no irreversible consequences to the environment.

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The waiver of compliance has been reviewed and approved by the Station Nuclear Safety and Operating Committee.

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

Very truly yours,



W. L. Stewart  
Senior Vice President - Nuclear

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

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