

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 14, 1990

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Serial No. 90-571
NO/ETS R2
Docket No. 50-281
License No. DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 2
TECHNICAL SPECIFICATION CHANGE REQUEST
APPENDIX J EXEMPTION

In accordance with 10 CFR 50.90, we are requesting a license amendment in the form of a change to the Technical Specifications for Operating License DPR-37 Surry Unit 2. Section III.D.3 of Appendix J requires Local Leak Rate Testing (LLRT) during every reactor shutdown for refueling but in no case at intervals greater than two years. Surry Unit 2 was shutdown for refueling on September 10, 1988 and remained in the refueling outage for 374 days to perform maintenance and modifications. Because of this extended outage the Type C testing requirements of 10 CFR 50 Appendix J will be due for performance prior to the scheduled refueling date (April 5, 1991). This is based on an interpretation that the interval requirement is applied individually to each applicable valve. On September 14, 1990, Virginia Electric And Power Company requested a one-time exemption from 10 CFR 50 Appendix J to perform the LLRT testing during the scheduled Cycle 10 refueling outage. This Technical Specification change request provides for a footnote in the surveillance requirements to document this exemption.

The technical basis and justification for the our September 14, 1990 exemption request (Serial No. 90-570) are applicable for this Technical Specification change.

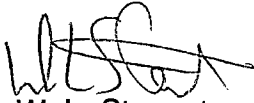
If Unit 2 were forced to go to cold shutdown and establish atmospheric conditions prior to the scheduled refueling outage, it is our intention to initiate Type C testing of the affected containment isolation valves. Testing would be performed at a rate of approximately five penetrations per day while the Unit remained in cold shutdown with atmospheric containment conditions.

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This Technical Specification change has been reviewed and approved by the Station Nuclear Safety and Operating Committee. It has been determined that the proposed change does not involve an unreviewed safety question as defined in 10 CFR 50.59 or a significant hazards consideration as defined in 10 CFR 50.92. The basis for our no significant hazards consideration determination is included in Attachment 2.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachments

1. Technical Specification Change - Appendix J Exemption
2. Significant Hazards Consideration Evaluation

cc: U. S. Nuclear Regulatory Commission
Region II
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Suite 2900
Atlanta, Georgia 30323

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

Commissioner
Department of Health
Room 400
109 Governor Street
Richmond, Virginia 23219

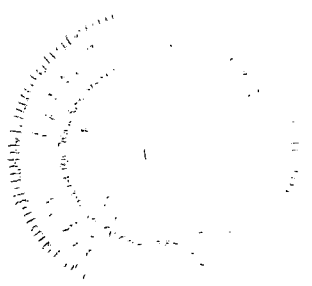
COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by W. L. Stewart who is Senior Vice President - Nuclear, of Virginia Electric and Power Company. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 14 day of September, 1990.

My Commission Expires: August 31, 1994.

Carolyn McMore
Notary Public



(SEAL)