

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

February 15, 1991

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

Serial No. 91-058  
NO/ETS  
Docket No. 50-281  
License No. DPR-37

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNIT 2**  
**PROPOSED TECHNICAL SPECIFICATION CHANGE**  
**ONE-TIME INSPECTION INTERVAL EXTENSION**  
**FOR LOW PRESSURE TURBINE BLADE INSPECTIONS**

Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company requests an amendment, in the form of a change to the Technical Specifications, for Surry Power Station Unit 2, Operating License DPR-37. The proposed one time Technical Specification change will extend the interval for the Unit 2 low pressure turbine blade inspections. The existing Technical Specification requirement is to inspect 100% of the blades every five years. The current inspection frequency for the turbine disks and hubs is based on turbine operating time and not calendar time. The current methodology includes steam quality, initial crack size, critical flaw size, and crack propagation rate as key parameters to develop the inspection frequency. Similar parameters are a consideration for the failure of a blade and can be linked to turbine operating time. By the 1993 refueling outage the Unit 2 turbine will have accumulated approximately 66 months of operating time, well within the inspection interval guidance provided by the turbine manufacturer. Therefore, coordinating the Low Pressure Turbine blade inspection with the disk and hub inspections in the 1993 refueling outage will not impact the safe operation of Unit 2.

The proposed change for Unit 2 is included in Attachment 1. In order to eliminate the unnecessary turbine blade inspections from the upcoming outage scope and coordinate both hub and blade inspections, we are requesting that the one-time Technical Specification change be approved prior to the end of the Unit 2 refueling outage.

It is our intention to modify the frequency of inspection for the Low Pressure Turbine blades in the future to match that of the turbine hubs and keyways inspection requirements. A permanent Technical Specification change will be submitted for both Units that allows use of the approved Westinghouse methodology as the basis of the low pressure turbine blade inspection frequency.

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This request has been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee. It has been determined that the proposed one-time 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

cc: U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N. W.  
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 E. W. Harrell, who is Vice President - Nuclear Operations, for 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 15 day of February, 1991.

My Commission Expires: May 31, 1994.

Vicki L. Huel  
Notary Public

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