

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

December 19, 1991

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

Serial No. 91-134E  
NL&P/CGL R2  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**INDIVIDUAL PLANT EXAMINATION - INTERNAL FLOODING**  
**ADDITIONAL COMMITMENTS**

On November 26, 1991, Virginia Electric and Power Company submitted the results of the Surry Internal Flooding Reanalysis (via letter Serial No. 91-134D). Enclosure 3 to our November 26, 1991 letter included identification of the completed and planned modifications and activities to reduce the vulnerability to internal flooding at Surry. During a subsequent discussion on December 2, 1991, we committed to perform the additional modifications and activities, which are identified in the attachment to this letter.

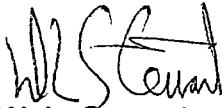
As discussed on December 2, 1991, interim actions to be taken relative to the condenser intermediate outlet expansion joints include internal and external inspection of the expansion joints and installation of reduced gap flow shields (with a design gap of  $\leq 1/8$  inch). A separate evaluation of the need to permanently install reduced gap flow shields on the service water and circulating water system expansion joints will be performed following these interim actions. In addition to the interim actions, the condenser intermediate outlet expansion joints will be replaced on an expedited schedule. The replacement schedule for these expansion joints is subject to material availability and the ability to perform the replacement under the existing technical specifications. Condenser intermediate outlet expansion joint replacement will be accomplished while the associated isolation valve is closed and seal plates installed. It is planned that the initial expansion joint replacements will be accomplished on lines servicing the condenser, which will not require relief from technical specification requirements. In order to accomplish expansion joint replacement on lines servicing safety related service water flowpaths (e.g., to the recirculation spray heat exchangers), the time required for the replacement will exceed the allowed outage time of the technical specifications for the affected system. Following the initial expansion joint replacements, we will identify the time necessary to complete the replacement activity and will request the required relief from technical specification requirements.

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We intend to advise you in approximately six months of the status of the modifications and activities associated with internal flooding as identified in this letter and in our November 26, 1991 letter (Serial No. 91-134D). If you have questions or require additional information, please contact us.

Very truly yours,



W. L. Stewart  
Senior Vice President - Nuclear

Attachment - Additional Planned Modifications and Activities Associated with Internal Flooding

cc: U. S. Nuclear Regulatory Commission  
Region II  
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Mr. M. W. Branch  
NRC Senior Resident Inspector  
Surry Power Station

**ADDITIONAL PLANNED MODIFICATIONS AND ACTIVITIES  
ASSOCIATED WITH INTERNAL FLOODING**

| <u>Modification or Activity</u>   | <u>Schedule</u> |
|---|-----------------|
| Evaluate Oconee modifications for internal flooding for applicability to Surry  | Complete        |
| As an interim measure, inspect condenser intermediate outlet expansion joints and install reduced gap flow shields (with a design gap of $\leq 1/8$ inch) | 12/31/91        |
| Replace condenser intermediate outlet expansion joints on Units 1 and 2   | 2/28/92*        |
| Evaluate modifications to seal plates for insertion against flow  | 2/15/92         |
| Evaluate increasing the height of dikes at the auxiliary building pipe tunnel and the turbine building emergency switchgear room door                     | 2/15/92         |
| Evaluate installation of a water tight door at the MER 3 - emergency switchgear room opening  | 2/15/92         |
| Evaluate the installation of permanent reduced gap flow shields on expansion joints   | 5/4/92          |
| Reassess the internal flooding design basis and update UFSAR, as necessary  | 7/1/92          |

- \* The replacement schedule for these expansion joints is subject to material availability and the ability to perform the replacement under the existing technical specifications.