

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

September 4, 1992

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

Serial No. 92-208  
NL&P/GDM R3  
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**  
**OPERATION OF THE AUXILIARY VENTILATION SYSTEM**

Recent conversations between the NRC and Virginia Electric and Power Company personnel identified the need to clarify the Basis section of Technical Specification 3.22, Auxiliary Ventilation Exhaust Filter Trains. The Basis requires revision to expand upon the description of the auxiliary ventilation damper alignment when a safety injection signal is received and fuel handling is in progress. Specifically, when irradiated fuel is being handled the system is manually placed in alignment to ensure the exhaust from the fuel handling areas passes through the filters. The automatic alignment feature of the ventilation system on a safety injection signal is defeated unless the fuel has decayed for a sufficient period of time such that the radiological consequences of a fuel handling accident would be acceptable without iodine filtration. Defeating the automatic alignment feature requires that, in the event of a LOCA, manual actions be taken to realign the ventilation system to the charging pump cubicles and safeguards areas following actions to secure fuel handling activities.

This alignment is intended to ensure that the mitigation of a fuel handling accident in containment or in the fuel building is preferentially addressed to ensure offsite radiological consequences meet 10 CFR 100 criteria. If fuel handling is not in progress on either unit, the safeguards area and charging pump cubicles' dampers automatically realign to the filter trains on a safety injection signal.

Attachment 1 provides the revised Technical Specification 3.22 Basis section which clarifies the operation of the Auxiliary Ventilation System as noted above. The NRC safety evaluation report for Technical Specification amendment 92/91 regarding the auxiliary ventilation system, provided in your letter dated January 17, 1984, as augmented by the NRC safety evaluation report for fuel handling accidents inside containment, provided in your letter of January 16, 1985, previously approved this operational approach by reference. Attachment 2 provides a discussion of the change.

Also, an administrative change has been made to the Basis section to change the word "absolute" in the term "high efficiency particulate absolute (HEPA) filters" to "air" consistent with the definition for a HEPA filter provided in Regulatory Guide 1.52.

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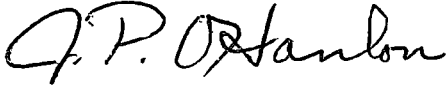
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ADD 1

Pursuant to 10 CFR 50.36(a) the bases are not considered part of the Technical Specifications. Consequently, this revision to the Basis section of Technical Specification 3.22 is provided for your information.

If you have any questions or require additional information, please contact us.

Very truly yours,



for W. L. Stewart  
Senior Vice President - Nuclear

Attachments

1. Basis
2. Discussion of Changes

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