

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

January 19, 1993

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

Serial No. 92-632
NO/ETS
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
PERIODIC INSPECTION OF
INSIDE RECIRCULATION SPRAY PUMPS

The Technical Specification surveillance requirements for the Inside Recirculation Spray System pumps were changed on May 24 and August 28, 1989, by Amendments 128 and 132 respectively, for both Units 1 and 2. Amendment 128 revised the frequency of the "dry bump" testing from monthly to quarterly. Amendment 132 established the requirement for full flow testing on a refueling basis and referenced "periodic inspections" of the pumps in the Basis Section. The "periodic inspections" referenced in the Basis Section are not explicitly defined.

Since the frequency of full flow testing is different from the ASME Code requirement, an exemption was also granted in accordance with 10 CFR 50.55 (g) (6) (i). Our justification for the reduced frequency testing was based on the inability to readily test inside containment during normal operations due to the time required to set-up, perform, and reconfigure. Additionally, overhauling the pump every five years was identified as increased assurance of continued pump operability.

Our commitment to periodically remove and inspect the Inside Recirculation Spray Pumps was consistent with the then existing North Anna Unit 2 License Condition 2. C. (15) (c). The North Anna Unit 2 license condition required that at least once every five years the recirculation spray pumps inside containment be removed and inspected and the bearings replaced, if necessary. Since it was anticipated that these pumps would not be flow tested over the life of the plant, the intent of the five year inspection and overhaul requirement was to ensure the long term mechanical reliability of the Inside Recirculation Spray System pumps by providing a mechanism for detection of pump degradation. North Anna Power Station has been performing full flow testing of these pumps on a refueling basis since 1987. The requirement for the periodic removal, inspection, and overhaul of the these pumps was eliminated by Amendment 127 to the North Anna Unit 2 License, dated February 20, 1991, based on the adequacy of full flow testing every refueling outage.

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Full-flow testing of the Surry Inside Recirculation Spray Pumps on a refueling basis in accordance with ASME Section XI, also provides an adequate level of assurance that the Inside Recirculation Spray System pumps will be capable of performing their intended function. Any significant degradation of the pump bearings, shaft journal wear, shaft bow, or significant impeller or bell cracking is identified by vibration analysis. Also the pump's hydraulic test data provide indication of a worn impeller or bell or increased pump clearances. Performing a periodic inspection or overhaul will not provide a significant increase in the assurance of pump operability. In addition, these pumps have carbon bearings that are subject to damage during removal and replacement of the pump.

We have likewise concluded that the present ASME Section XI vibration and full flow testing every refueling outage is sufficient to establish pump operability or identify any pump degradation trends. It is our intention to retract our commitment to perform periodic disassembly and inspection of Inside Recirculation Spray Pumps. It is our position that this specific commitment was not foundational to the NRC approval of Amendment No. 132, where the commitment was specifically referenced in the associated Safety Evaluation Report and is implicitly referenced in the Basis of Technical Specification 4.5. Elimination of the periodic inspection requirement for the Inside Recirculation Spray Pumps 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. Therefore, we request NRC concurrence that periodic disassembly of the Inside Recirculation Spray Pumps was not foundational to NRC approval of Amendment No. 132 and that this commitment may be eliminated as unnecessary. A Technical Specification Basis change is included in the Attachment for insertion into your copy of the Surry Technical Specifications.

Should you have any additional questions, please contact us.

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachment

cc: U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W.
Suite 2900
Atlanta, Georgia 30323

Mr. M. W. Branch
NRC Senior Resident Inspector
Surry Power Station