

WILLIAM L. STEWART
Senior Vice President

DOCKET NUMBER
PETITION RULE PRM 50-55
(55FR18608)

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VIRGINIA POWER

Mr. Samuel J. Chilk
Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Serial No. 90-436
NL&P/LB:jmj

Attn: Docketing and Service Branch

Dear Mr. Chilk:

**NOTICE OF RECEIPT OF PETITION FOR RULEMAKING
REVISIONS TO FINAL SAFETY ANALYSIS REPORTS, 10CFR50
55 FEDERAL REGISTER 18608
REQUEST FOR COMMENTS**

Virginia Power is pleased to respond to the request of the U.S. Nuclear Regulatory Commission (NRC) for comments on a petition for rulemaking concerning the frequency of Final Safety Analysis Report (FSAR) revisions under 10CFR50 (55 Federal Register 18608, May 3, 1990). We concur with the comments submitted to the NRC by the Nuclear Management and Resources Council, Inc. (NUMARC) on July 2, 1990 addressing the frequency of FSAR revisions.

We agree that the frequency of FSAR updates should be within nine months following a refueling outage as opposed to the six months requested by the petitioners. Due to the number and complexity of modifications that may be accomplished in a refueling outage, nine months is a more reasonable time period in which to prepare FSAR updates. Accordingly, Virginia Power endorses the following revised wording to 10 CFR 50.71 (e)(4) as suggested by NUMARC:

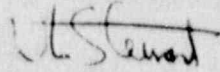
"Subsequent revisions shall be submitted no less frequently than nine months following the completion of a planned refueling outage and shall reflect all changes up to a maximum of six months prior to the date of filing. If two or more facilities share a common FSAR and the licensee elects to revise that FSAR following refueling outages, the licensee shall designate the refueling outage schedule of one of the facilities to establish the schedule for revisions of the common FSAR."

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Virginia Power supports the NUMARC position that the petitioner's requested change would be beneficial to both the NRC and the industry. We appreciate the opportunity to comment on this issue and would be pleased to discuss our comments further with the appropriate NRC personnel.

Very truly yours,



W. L. Stewart

cc: United States Nuclear Regulatory Commission
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Atlanta, GA 30323

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

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