

## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555 October 19, 1978

Docket Nos. 50-280 and 50-281

> Virginia Electric and Power Company ATTN: Mr. W. L. Proffitt Senior Vice President - Power Post Office Box 26666 Richmond, Virginia 23261

Gentlemen:

We have reviewed the information provided in your letter dated July 26, 1978, concerning the inspection and maintenance of the outside recirculation spray (ORS) pumps and a low head safety injection (LHSI) pump for Surry Unit 2. Information on these pumps in Surry Unit 1 was provided in your May 26, 1978 letter. The work discussed in these letters was performed in response to NRC requests in letters dated May 5, 1978 and June 8, 1978.

In our letter dated June 8, 1978 we detailed test programs which we considered essential to demonstrate long term operability of the ORS pumps, the LHSI pumps and the Inside Recirculation Spray (IRS) pumps.

Your letter dated July 26, 1978 stated that, based on test and inspection data on the LHSI and ORS pumps, full long term testing of the LHSI or ORS is not warranted. In view of this conclusion, you state that the LHSI pumps at Surry have shown no evidence of less than excellent performance based on approximately 50 hours of operation and point out that the ORS pumps have undergone modifications identical to the modifications made on similar pumps at North Anna. You note that the modified North Anna pumps passed 450 hours of testing.

We do not agree with your assessment that the excellent condition of LHSI pumps after about 50 hours of operation and the maintenance performed on the ORS pumps is sufficient to assure long term operability of these pumps. While the tests done at North Anna provide pertinent data concerning long term operability of those specific pumps, those pumps are only similar, not identical to the Surry pumps. We do not believe the degree of similarity is sufficient to warrant extrapolating the North Anna test data to apply that data to the Surry pumps. Therefore, we conclude that endurance testing is required to provide assurance of long term operability for the LHSI and ORS pumps. Our position is that endurance testing is also required on one of the Surry inside recirculation pumps (IRS).

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Therefore, we request that you perform the testing described in our June 8, 1978 letter and, within fifteen days of the date of this letter provide us with your intent and schedule to perform this testing.

In your letter of July 26, 1978 you also stated, based on one inspection, that dry testing of the IRS pumps does not cause excessive wear. We do not consider this to be a sufficient basis for not seeking an alternative to continued dry testing. Therefore, we reiterate the request stated in our June 8, 1978 letter, that you propose changes to the IRS testing conditions or provide additional justification (e.g., a formal endorsement by the manufacturer) that dry testing is non-detrimental to service life performance. Your further response on this matter is requested within fifteen days of the date of this letter.

Sincerely,

Darrell G. Eisenhut, Assistant Director for Systems and Projects
Division of Operating Reactors

cc: See next page

cc: Mr. Michael W. Maupin Hunton & Williams Post Office Box 1535 Richmond, Virginia 23213

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