

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 5, 1999

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

Serial No.: 99-255A
NL&OS/GDM: R0'
Docket No.: 50-280
License No.: DPR-32

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 1
ASME SECTION XI RELIEF REQUEST P-11

By letter dated December 18, 1998, the NRC provided a Safety Evaluation that authorized incorporation of Relief Request P-11, Revision 1, into the Virginia Electric and Power Company Surry Unit 1 Inservice Testing (IST) Program for Pumps and Valves. This relief request addressed certain testing requirements for the emergency service water pumps (ESWPs).

The NRC stated in Section 3.3 of the referenced Safety Evaluation that since the request for relief did not specifically identify that we were requesting relief from the requirements of Section 6.1 of OM-6, we were required to comply with these Code requirements "using the revised test frequency and hydraulic acceptance criteria approved by this SE."

In a letter dated May 25, 1999 (Serial No. 99-255), we took exception to the revised test frequency requirement based on the conservatisms built into the test program for the ESWPs, and provided a revision to the P-11 relief request that did not impose the increased test frequency. A telephone conference call was held on August 12, 1999 between our respective staffs to discuss the proposed revision to the P-11 relief request. During this phone call we discussed the NRC's reservations about approving our proposed revision, as well as the various activities that were under way to improve the overall performance of the ESWPs. At the conclusion of the phone call, we stated our intention to provide additional information to further substantiate our request to eliminate the increased test frequency requirement.

We have since implemented certain modifications on the ESWPs to improve their performance, and no longer believe that the proposed revision to the currently approved version of the P-11, Revision 1, relief request is necessary. Therefore, we are hereby

A047

withdrawing our May 25, 1999 request to revise the subject relief request, and will abide by the requirements of the relief request as currently approved by the NRC.

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

Very truly yours,



Leslie N. Hartz
Vice President- Nuclear Engineering and Services

Commitments contained in this correspondence: None.

cc: U.S. Nuclear Regulatory Commission
 Region II
 Atlanta Federal Center
 61 Forsyth St., SW, Suite 23T85
 Atlanta, Georgia 30303

Mr. R.A. Musser
NRC Senior Resident Inspector
Surry Power Station

Mr. Robert Smith
Authorized Nuclear Inspector
Surry Power Station