

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

March 18, 1980

Mr. James P. O'Reilly, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, GA 30303

Serial No. 195
PSE&C/CMRjr:mac:wang

Docket No. 50-280

License No. DPR-32

Dear Mr. O'Reilly:

REQUEST FOR ANALYSIS EXTENSION FOR
I.E. BULLETIN 79-14
SURRY POWER STATION - UNIT 1

We wish to inform you that substantial progress has been made to comply with the provisions of I.E. Bulletin 79-14 as set forth in the time table in our letter of October 4, 1979 (Vepco Serial No. 817). An expedited schedule has been used to the maximum possible extent commensurate with thorough and accurate procedures to establish the validity of all calculations.

We must inform you that total completion of I.E. Bulletin 79-14 analyses is not possible in the five month period stated in our October 4, 1979 letter. Based upon our progress to date, we believe an extension to the end of May is necessary to substantially complete the analysis. We believe it is imperative to continue, in a timely manner, our established program of quality calculations to assure the highest confidence level in the Surry piping systems. Under these circumstances, we feel that an extension to May is justified and consistent with your concern for an expedited, yet thorough, review of I.E. Bulletin 79-14 piping systems. By the end of May, analyses will be completed to the extent that all modifications will be identified sufficiently to allow field work to proceed. Final checking, verification, documentation, Engineering Assurance signoff, and related activities will continue after the end of May.

In addition, there are two long term items which will require analysis beyond the end of May to fully complete the final I.E. Bulletin 79-14 analysis. Both items involve the service water system outside the containment and were not foreseen at the time of the original commitment to a five month analysis period.

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The first item concerns the service water system consisting of Class 136 (reinforced fiberglass) piping supplying the three control room air conditioning chillers. To enhance maintainability, we are currently designing a more efficient routing of the system. A complete piping system changeover will not be operational until after mid-summer. The final I.E. Bulletin 79-14 analysis, therefore, cannot take place until this piping work has been completed.

The second item concerns other portions of the service water piping consisting of Class 136 piping. It is our intent to upgrade this piping as much as practicable to the best available technology through the use of Regulatory Guide 1.72, "Spray Pond Piping Made From Fiberglass-Reinforced Thermosetting Resin," and ASME Section III, Code Case N-155-2, "Fiberglass Reinforced Thermal Setting Resin Pipe" as guidelines. These documents were not in existence when the original analysis was performed, and their use represents a definite upgrade of the system to further enhance the analytical acceptability of the Class 136 piping at Surry. The final I.E. Bulletin 79-14 analysis, therefore, cannot take place until this work has been completed.

As you are aware, we have been in regular communication with your staff since October in order to keep you fully apprised of our efforts. We intend to continue this practice.

We believe our request for an extension of time to the end of May for the completion of analysis in the extent noted above is reasonable and justifiable. We would appreciate a prompt review of our request.

Very truly yours,
Original signed by
Jack H. Ferguson

J. H. Ferguson
Executive Vice President - Power

cc: Mr. Victor Stello, Director
Office of Inspection & Enforcement

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation