

VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

July 11, 1980

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

Serial No. 611  
PSE&CS/CMRjr:jpj:mag

Docket No. 50-281

License No. DPR-37

Dear Mr. O'Reilly:

I.E. BULLETIN 79-14  
SYSTEMS OUTSIDE CONTAINMENT  
AMPLIFICATION OF JULY 8, 1980 LETTER  
SURRY POWER STATION UNIT 2

The purpose of this letter is to provide amplification and clarification of our letter of July 8, 1980 (Vepco Serial No. 591). Discussions were held with Messrs. D. G. Eisenhut, William Russell, Donald Neighbors and R. M. Compton in Bethesda on July 8th. As a result of those discussions it was felt that some additional information was needed to clarify and amplify our positions contained in the July 8th letter. The following items should be considered in conjunction with that letter:

1. As you are aware, detailed analyses have not been completed for all supports on I.E. Bulletin 79-14 systems outside the containment for Surry Power Station Unit 2. However, we have identified approximately 294 supports which we believe must be installed as part of the I.E. Bulletin 79-14 effort. Of these only 154 are on Technical Specification systems. We have identified 76 of the 154 as being related to stress analysis of piping systems and as stated in our letter of July 8, 1980, these will be installed prior to start-up. A total of 136 of 294 modification packages have been received by Vepco as of July 9, 1980. These numbers should be considered as being approximate only.
2. Item 1 of our July 8th letter mentioned a 30 day screening process for determination of significantly overstressed supports. It is our intent to construct modifications during the 30 day screening process concurrent with the determination of whether or not the support is significantly overstressed as delineated in Item 2 of our letter. We may forego the screening process if we believe the modifications can be installed during the 30 day period. We believe this will upgrade the systems in an expeditious manner.
3. We commit to placing the highest priority on supports associated with Technical Specification systems. We will instruct our Architect-Engineers that these modification packages are to be turned over to Vepco no later than 60 days from the date of start-up.

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Mr. James P. O'Reilly, Director

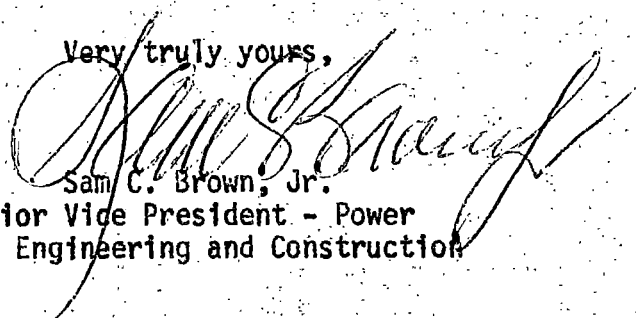
As a point of additional clarification we wish to emphasize a matter that appears to be overlooked when considering Vepco's approach to resolving I.E. Bulletin 79-14. Due to a lack of original documentation Vepco has been unable to perform a comparison of as-built drawings with originally designed drawings as stipulated in the Bulletin.

Vepco's approach has been to dynamically analyze I.E. Bulletin 79-14 systems, even though these systems were originally analyzed using simplified methods. Implicit in the present approach is a general upgrading of systems to criteria not in existence at the time of the original design. The present approach is clearly beyond that required according to the licensing documents pertaining to Surry. We have chosen this approach because original documentation is not available. Use of this approach also allows early development of a modification package, if required, based on preliminary calculations while detailed evaluation progresses. The modification packages are installed in an expeditious manner and are verified by final calculations to assure that all possible parameters are realistic.

We intend to continue our approach as we believe that rapid upgrading of systems represents a thoroughly conservative and viable method for meeting the intent of I.E. Bulletin 79-14. We plan to have the requirements of I.E. Bulletin 79-14 completely satisfied no later than December 31, 1980.

If you have any questions please contact us.

Very truly yours,

  
Sam C. Brown, Jr.  
Senior Vice President - Power  
Station Engineering and Construction

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

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