VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

Re: 10 CFR 2.202

NL&OS/ETS

February 28, 2003

Secretary, Office of the Secretary of the Commission Serial No.: 03-142

U.S. Nuclear Regulatory Commission

ATTN: Rulemaking and Adjudications Staff Docket Nos.: 50-280

Washington, D.C. 20555-0001 50-281

License Nos.: DPR-32 DPR-37

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
ANSWER TO ORDER FOR INTERIM INSPECTION REQUIREMENTS FOR
REACTOR PRESSURE VESSEL HEADS AT PRESSURIZED WATER REACTORS
DATED FEBRUARY 11, 2003

On February 11, 2003, the Nuclear Regulatory Commission (NRC) issued an Order for Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors licensees. The Order requires specific inspection of the reactor pressure vessel (RPV) head and associated penetration nozzles at pressurized water reactors (PWRs). The Commission stated that the actions in the Order are interim measures, necessary to ensure that licensees implement and maintain appropriate measures to inspect and, as necessary, repair RPV heads and associated penetration nozzles. The Order required that licensees immediately start implementation of the requirements of the Order and respond to specific actions within twenty (20) days of the date of the Order.

In accordance with Section V of the Order and 10 CFR 2.202, Virginia Electric and Power Company (Dominion) hereby submits its answer to the Order. Dominion consents to the Order as described in Section IV and does not request a hearing.

Currently, the Surry Units 1 and 2 replacement RPV heads are being designed to operate without thermal sleeves in the penetration nozzles. If thermal sleeves are required to be installed, 100 percent inspection coverage of the penetration nozzle base material in the area of the weld and above the J-groove weld may not be obtainable as required by Section IV.C(3)(b) of the Order. If thermal sleeves are installed, the exact

limitation on coverage cannot be established until the first inspections required by the Order are performed. If 100 percent coverage of the area of interest cannot be obtained during inspection of the penetration nozzles, Dominion will seek relaxation from the inspection requirements in Section IV.C(3)(b) of the Order at that time.

If you have any questions, please contact Mr. Thomas Shaub at (804) 273-2763.

Very truly yours,

David A. Christian

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Senior Vice President - Nuclear Operations and Chief Nuclear Officer

Commitments made in this letter: None

cc: U. S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Washington, D. C. 20555

Mr. Samuel J. Collins, Director

Office of Nuclear Reactor Regulation

U. S. Nuclear Regulatory Commission

Washington, D. C. 20555

Assistant General Counsel for Materials Litigation and Enforcement

U. S. Nuclear Regulatory Commission

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U. S. Nuclear Regulatory Commission Regional Administrator - Region II Sam Nunn Atlanta Federal Center 61 Forsyth St., SW, Suite 23T85 Atlanta, Georgia 30303

Mr. C. Gratton NRC Senior Project Manager Surry Power Station

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

Serial No.: 03-142

Docket Nos.: 50-280/281

Surry Response to RPV Head and Penetration Nozzles Inspection Order (EA-03-009)

COMMONWEALTH OF VIRGINIA	,
COUNTY OF HENRICO	;

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by David A. Christian who is Senior Vice President -Nuclear Operations and Chief Nuclear Officer of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 28^{7H} day of 31,2006.

(SEAL)