April 19, 2000

Mr. J. P. O'Hanlon Senior Vice President - Nuclear Virginia Electric and Power Company 5000 Dominion Blvd. Glen Allen, Virginia 23060

SUBJECT: NORTH ANNA POWER STATION UNITS 1 AND 2, AND SURRY POWER STATION UNITS 1 AND 2 RE: ASME SECTION XI RELIEF REQUEST, CODE CASE N-597 (TAC NOS. MA5637, MA5638, MA5632, AND MA5633)

Dear Mr. O'Hanlon:

The purpose of this letter is to deny the relief you requested for North Anna Power Station, Units 1 and 2, and Surry Power Station, Units 1 and 2, in your request for approval to use Code Case N-597 related to your inservice inspection programs.

In a letter dated May 13, 1999, Virginia Electric and Power Company (VEPCO) proposed the use of ASME Section XI Code Case N-597 ("Requirements for Analytical Evaluation of Pipe Wall Thinning," ASME Section XI, Division 1, March 2, 1998) for the analytical evaluation of Class 1, 2 and 3 carbon and low alloy steel piping components subjected to wall thinning as a result of flow accelerated corrosion (FAC) or other corrosion phenomena. In accordance with 10 CFR 50.55a(a)(3)(i), VEPCO requested NRC approval for the use of this Code Case, as an alternative to the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, IWA-4000 relating to the evaluation of a component where the thickness has been reduced below the minimum design thickness.

This Code Case has not been approved for use in Regulatory Guide 1.147 "Inservice Inspection Code Case Acceptability ASME Section XI, Division 1." In its generic review, the staff has found that the Code Case provides neither inspection requirements nor thinning rates for use with this Code Case. The staff is concerned that thinning rates as currently determined and implemented are not appropriate for establishing thinning rates in safety related systems subject to FAC.

The NRC staff has reviewed this Code Case and concludes that the request by VEPCO for non-situation-specific application of Code Case N-597 at the Surry and North Anna Power Stations is not acceptable. However, VEPCO may request approval for application of this Code Case on a case-by-case basis, subject to staff review and approval, until it is endorsed by the NRC in Regulatory Guide 1.147, with appropriate limitations and conditions for application.

J. P. O'Hanlon

The staff has completed its evaluation of this matter; therefore, we are closing TAC Nos. MA5632, MA5633, MA5637 and MA5638.

Sincerely,

/RA/

Richard L. Emch, Jr., Chief, Section 1 Project Directorate II Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket Nos. 50-280, 50-281, 50-338, and 50-339

cc: See next page

J. P. O'Hanlon

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